



Missouri Department of Natural Resources
Air Pollution Control Program

PART 70

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.

Operating Permit Number: OP2010-009
Expiration Date: JAN 11 2015
Installation ID: 155-0049
Project Number: 2006-11-082

Installation Name and Address

Trinity Marine Products, Inc. - Plant No. 73
County Line Road #337
P.O. Box 1134
Caruthersville, MO 63830
Pemiscot County

Parent Company's Name and Address

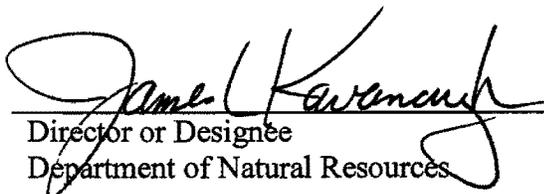
Trinity Marine Products, Inc.
P.O. Box 568887
Dallas, TX 75356

Installation Description:

Trinity Marine Products operates a facility in Caruthersville, Missouri, that manufactures fiberglass covers and access doors for barges.

JAN 12 2010

Effective Date



Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT LIMITATIONS	3
DOCUMENTS INCORPORATED BY REFERENCE	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
Permit Condition PW001	5
10 CSR 10-6.060 Construction Permits Required.....	5
Construction Permit No. 1197-025A	5
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	7
EU0010 THROUGH EU0020 – OPEN-FACED CONTACT FIBERGLASS MOLDING OPERATION	7
Permit Condition EU0010-001 through EU0020-001	7
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations	7
40 CFR Part 63, Subpart WWWW National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.....	7
Permit Condition EU0010-002	13
10 CSR 10-6.060 Construction Permits Required.....	13
Construction Permit No. 022001-018	13
EU0030 – RESIN STORAGE TANK	14
Permit Condition EU0030-001	14
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations	14
40 CFR Part 63, Subpart WWWW National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.....	14
IV. CORE PERMIT REQUIREMENTS	15
V. GENERAL PERMIT REQUIREMENTS.....	22
VI. ATTACHMENTS	27
ATTACHMENT A	28
Fugitive Emission Observations	28
ATTACHMENT B	29
Construction Permit Number 1197-025A — VOC Compliance Worksheet.....	29
ATTACHMENT C	30
Construction Permit Number: 1197-025A — Styrene Compliance Worksheet	30
ATTACHMENT D	31
Construction Permit Number 022001-018 — Styrene Compliance Worksheet	31
ATTACHMENT E	32
Table 3 to Subpart WWWW of Part 63 — Organic HAP Emissions Limits	32
ATTACHMENT F.....	34
Table 4 to Subpart WWWW of Part 63 — Work Practice Standards	34
ATTACHMENT G	35
Table 1 to Subpart WWWW of Part 63 — Organic HAP Emissions Factors	35

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Trinity Marine Products manufactures fiberglass covers and access doors for barges in Pemiscot County. The covers are manufactured using an open molding process with nonatomized mechanical resin application and nonvapor-suppressed resin. The installation is an existing major source of volatile organic compounds (VOC) and hazardous air pollutants (HAP). HAPs emissions from the fiberglass operations are covered by 40 CFR 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production.

A mold is first sprayed with a polyester gelcoat and allowed to cure. Chopped strand mat and polyester resin are sprayed onto the mold and structural woven glass saturated with the resin is applied to the chopped strand and conformed to the mold shape. After the layers are applied, any entrapped air is removed from the laminate by rolling. The laminate is then allowed to cure, after which it is removed from the mold, trimmed, fitted with the appropriate hardware and the shipped to the clients.

The reported actual emissions for the past five years for the installation are listed below:

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2008	0.03	0.00	0.00	0.60	51.92	0.12	0.00	47.90
2007	0.02	0.00	0.00	0.43	43.27	0.09	0.00	43.18
2006	0.04	0.00	0.00	0.41	79.37	0.08	0.00	77.44
2005	0.02	0.00	0.00	0.35	87.36	0.07	0.00	87.31
2004	0.02	0.16	0.00	0.32	131.30	0.63	0.00	117.37

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
EU0010	Access Door Fabrication Area - Fiberglass Spray-Up Operation
EU0020	Barge Cover Fabrication Area - Fiberglass Lay-Up Operation
EU0030	Resin Storage Tank

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source
Space Heater, 9.3 MMBtu/hr – Natural Gas Fired Trim Area (trimming, grinding, and cutting)

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Air Pollution Control Program Construction Permit 1197-025A, Issued August 18, 2000; and
- 2) Air Pollution Control Program Construction Permit 022001-018, Issued February 23, 2001.

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 as of the date that this permit is issued.

Permit Condition PW001

10 CSR 10-6.060
Construction Permits Required
Construction Permit No. 1197-025A

Emission Limitation:

- 1) Trinity Marine Products shall discharge into the atmosphere from this installation VOC in amounts less than 250.0 tons in any consecutive 12-month period. [Construction Permit 1197-025A, Special Condition 1]
- 2) Trinity Marine Products shall discharge into the atmosphere from this installation styrene in amounts less than 241.1 tons in any consecutive 12-month period. [Construction Permit 1197-025A, Special Condition 2]
- 3) If a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.090, the Director may require Trinity Marine Products to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. Trinity Marine Products shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan will be a violation of this permit. [Construction Permit 1197-025A, Special Condition 8]
- 4) Trinity Marine Products shall not perform touchup and repairs activities in various locations on its property. Touchup and repairs activities shall always take place at the same location specified in the input file provided by Trinity coordinates: 257335.5 meter easting, 4012744 meters northing. [Construction Permit 1197-025A, Special Condition 10]

Monitoring/Record Keeping:

- 1) Trinity Marine Products shall keep monthly records that are adequate to determine the VOC emissions from this installation. These records shall also indicate the total quantity of VOC emissions from the installation over the previous 12-month period. Attachment B, VOC Compliance Worksheet, or an equivalent form of the company's own design, approved by the Air Pollution Control Program is suitable for this purpose. The most recent 60-months of records shall be maintained on-site and shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request. [Construction Permit 1197-025A, Special Condition 5]
- 2) Trinity Marine Products shall keep monthly records that are adequate to determine the styrene emissions from this installation. These records shall also indicate the total quantity of styrene emissions from the installation over the previous 12-month period. Attachment C, Styrene Compliance Worksheet, or an equivalent form of the company's own design, approved by the Air Pollution Control Program is suitable for this purpose. The most recent 60-months of records shall be maintained onsite and shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request. [Construction Permit 1197-025A, Special Condition 6]

Reporting:

Trinity Marine Products shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of each month, if: [Construction Permit 1197-025A, Special Condition 7]

- 1) The 12-month cumulative total (Special Condition No. 5 of Construction Permit 1197-025A) records show that the source exceeded the limitation of Special Condition No. 1 of Construction Permit 1197-025A (250 tons of VOC emitted); or
- 2) The 12-month cumulative total (Special Condition No. 6 of Construction Permit 1197-025A) records show that the source exceeded the limitation of Special Condition No. 2 of Construction Permit 1197-025A (241.1 tons of styrene emitted).

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 as of the date that this permit is issued.

EU0010 through EU0020 – Open-Faced Contact Fiberglass Molding Operation		
Emission Unit	Description	2008 EIQ Reference #
EU0010	Access Door Fabrication Area - Fiberglass Spray-Up Operation	EP04
EU0020	Barge Cover Fabrication Area - Fiberglass Lay-Up Operation	EP01

Permit Condition EU0010-001 through EU0020-001
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart WWWW National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

Trinity Marine Products has elected to use the weighted average emission limit option, §63.5810(c) to show compliance with Subpart WWWW.

Emission Limitation/Standards

You must meet the requirements of §63.5805(b) and (g). You may elect to comply using any options to meet the standards described in §§63.5810 through 63.5830. Use the procedures in §63.5799 to determine if you meet or exceed the 100 tpy threshold. [§63.5805]

- 1) All operations at existing facilities not listed in §63.3805(a) must meet the organic HAP emissions limits in Table 3 (see Attachment E) to this subpart and the work practice standards in Table 4 (see Attachment F) to this subpart that apply, regardless of the quantity of HAP emitted. [§63.5805(b)]
- 2) If you have repair operations subject to this subpart as defined in §63.5785, these repair operations must meet the requirements in Table 3 (see Attachment E) and 4 (see Attachment F) to this subpart and are not required to meet the 95 percent organic HAP emissions reduction requirements in §63.5805 (a)(1) or (d). [§63.5805(g)]

General Compliance Requirements:

- 1) You must be in compliance at all times with the work practice standards in Table 4 (see Attachment F) to this subpart, as well as the organic HAP emissions limits in Table 3 to this subpart, as applicable, that you are meeting without the use of add-on controls. [§63.5835(a)]
- 2) You must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR §63.6(e)(1)(i). [§63.5835(c)]
- 3) Table 15 to this subpart shows which parts of the General Provisions in 40 CFR §§63.1 through 63.15 apply to you. [§63.5925]

Continuous Compliance Requirements:

- 1) You must demonstrate continuous compliance with each standard in §63.5805 that applies to you according to the methods specified in §63.5900(a)(2) and (4). [§63.5900(a)]

- a) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 to this subpart (see Attachment E), on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d). [§63.5900(a)(2)]
- b) Compliance with the work practice standards in Table 4 (see Attachment F) to this subpart is demonstrated by performing the work practice required for your operation. [§63.5900(a)(4)]
- 2) You must report each deviation from each standard in §63.5805 that applies to you. The deviations must be reported according to the requirements in §63.5910. [§63.5900(b)]
- 3) Except as provided in §63.5900(d), during periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you. [§63.5900(c)]

Monitoring:

- 1) Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations. Open molding operations and centrifugal casting operations may not be averaged with each other. [§63.5810(c)]
 - a) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 to this subpart for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown below in Equation 3 of §63.5810. [§63.5810(c)(1)]

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}$$

Where:

EL_i = organic HAP emissions limit for operation type i, lbs/ton from Table 3 to this subpart;

Material_i = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n = number of operations.

- b) Each month calculate your weighted average organic HAP emissions factor for open molding. To do this, multiply your actual open molding operation organic HAP emissions factors calculated in §63.5810(b)(1) and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown below in Equation 4 of §63.5810. [§63.5810(c)(2)]

$$\text{Actual Weighted Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}$$

Where:

Actual Individual EF_i = Actual organic HAP emissions factor for operation type i, lbs/ton;

$Material_i$ = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n = number of operations.

- c) Compare the values calculated in §63.5810 (c)(1) and (2). If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance. [§63.5810(c)(3)]
- 2) You may use the equations in Table 1 to this subpart to calculate your emissions factors. Equations are available for each open molding operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for you to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, you can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided your site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. You may also use the organic HAP emissions factors calculated using the equations in Table 1 to this subpart, combined with resin and gel coat use data, to calculate your organic HAP emissions. [§63.5796]
- 3) In order to determine the organic HAP content of resins and gel coats, you may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in §63.5797 (a) through (c), as applicable. [§63.5797]
- a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds. [§63.5797(a)]
- b) If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR Part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance. [§63.5797(b)]
- c) If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance.

- d) If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance. [§63.5797(c)]
- 4) If you wish to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 to this subpart, you may use the procedures in §63.5798 (a) or (b) to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits in this subpart, and to calculate facility organic HAP emissions. [§63.5798]
- a) Perform an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in §63.5850. [§63.5798(a)]
- b) Submit a petition to the Administrator for administrative review of this subpart. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites. We will review the submitted data, and, if appropriate, update the equations in Table 1 to this subpart. [§63.5798(b)]
- 5) Calculating Organic HAP Emissions Factors for Open Molding:
- a) Emissions factors are used in this subpart to determine compliance with certain organic HAP emissions limits in Table 3. You may use the equations in Table 1 (see Attachment G) to this subpart to calculate your emissions factors. Equations are available for each open molding operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for you to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, you can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided your site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. You may also use the organic HAP emissions factors calculated using the equations in Table 1 (see Attachment G) to this subpart, combined with resin and gel coat use data, to calculate your organic HAP emissions. [§63.5796]
- b) In order to determine the organic HAP content of resins and gel coats, you may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in §63.5797 (a) through (c) of, as applicable. [§63.5797]
- i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds. [§63.5797(a)]
- ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of Appendix A to 40 CFR Part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance. [§63.5797(b)]
- iii) If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate

compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance. [§63.5797(c)]

- c) If you wish to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 (see Attachment G) to this subpart, you may use the procedures in §63.5798 (a) or (b) of this section to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits in this subpart, and to calculate facility organic HAP emissions. [§63.5798]
 - i) Perform an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in §63.5850. [§63.5798(a)]
 - ii) Submit a petition to the Administrator for administrative review of this subpart. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites. We will review the submitted data, and, if appropriate, update the equations in Table 1 (see Attachment G) to this subpart. [§63.5798(b)]

Recordkeeping:

- 1) You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 (see Attachment E) to this subpart. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [§63.5895(c)]
- 2) You must keep the records listed in §63.5915(a)(1) and(3). [§63.5915(a)]
 - a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.5915(a)(1)]
 - b) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2). [§63.5915(a)(3)]
- 3) You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Table 3 (see Attachment E) to this subpart. [§63.5915(c)]
- 4) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 (see Attachment F) to this subpart, as applicable. [§63.5915(d)]
- 5) You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1). [§63.5920(a)]
- 6) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.5920(b)]
- 7) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years. [§63.5920(c)]
- 8) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. [§63.5920(d)]

Reporting:

- 1) Notifications [§63.5905]:
 - a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR Part 63, Subpart A, referenced in Table 13 to this subpart. [§63.5905(a)]
 - b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change. [§63.5905(b)]
- 2) Reports [§63.5910]:
 - a) You must submit each report in Table 14 to this subpart that applies to you. [§63.5910(a)]
 - b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to §63.5910(b)(1) through (5). [§63.5910(b)]
 - i) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.5800 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.5800. [§63.5910(b)(1)]
 - ii) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.5800. [§63.5910(b)(2)]
 - iii) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. [§63.5910(b)(3)]
 - iv) (Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. [§63.5910(b)(4)]
 - v) For each affected source that is subject to permitting requirements pursuant to 40 CFR Part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6 (a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in §63.5910(b)(1) through (4). [§63.5910(b)(5)]
 - c) The compliance report must contain the information listed below: [§63.5910(c)]
 - i) Company name and address. [§63.5910(c)(1)]
 - ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.5910(c)(2)]
 - iii) Date of the report and beginning and ending dates of the reporting period. [§63.5910(c)(3)]
 - iv) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. [§63.5910(c)(5)]
 - d) For each deviation from an organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in §63.5910(c)(1) through (3) and in §63.5910 (d)(1) and (2). This includes periods of startup, shutdown, and malfunction. [§63.5910(d)]

- i) The total operating time of each affected source during the reporting period. [§63.5910(d)(1)]
- ii) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.5910(d)(2)]
- e) Each affected source that has obtained a title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.5910(g)]
- f) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to this subpart, and not based on the requirements in §63.999. [§63.5910(h)]
- g) Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report. [§63.5910(i)]

Permit Condition EU0010-002

10 CSR 10-6.060
Construction Permits Required
Construction Permit No. 022001-018

Emission Limitation:

Trinity Marine Products shall discharge into the atmosphere styrene in amounts no more than 100.0 tons in any consecutive twelve (12) month period from EU0010 (Access Door Fabrication Area – Fiberglass Spray-Up Operation) due to the use of Spray-Up, Gel Coat, and/or Laminate styrene.
[Construction Permit 022001-018, Special Condition 2]

Monitoring/Record Keeping:

The permittee shall keep monthly records that are adequate to determine the styrene emissions from EU0010. These records shall also indicate the total quantity of styrene emissions from EU0010 over the previous twelve (12) month period. Attachment D, Monthly Styrene Emissions Worksheet for EU0010, or an equivalent form of the company's own design, approved by the Air Pollution Control Program is suitable for this purpose. The most recent sixty (60) months of records shall be maintained on-site and shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request. [Construction Permit 022001-018, Special Condition 3]

Reporting:

Trinity Marine Products shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of each month if the 12-month cumulative total (Special Condition No. 3 of Construction Permit 022001-018) records show that the source exceeded the limitation of Special Condition No. 2 of Construction Permit 022001-018 (100.0 tons of styrene emitted in any consecutive 12-month period).
[Construction Permit 022001-018, Special Condition 4]

EU0030 – Resin Storage Tank		
Emission Unit	Description	2008 EIQ Reference #
EU0030	Resin Storage Tank (13,000 gal)	EP03

Permit Condition EU0030-001
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart WWWW National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

Work Practice:

Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. [Item 3 of Table 4 to Subpart WWWW of Part 63]

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. 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. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Trinity Marine Products, Inc. - Plant No. 73 may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Trinity Marine Products, Inc. - Plant No. 73 fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

- i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
 - 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
 - 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
 - 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

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

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) annually.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 5) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-3.090 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).

- e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
- f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements

1) Record Keeping

- a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
- b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

2) Reporting

- a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
- b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi 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, this includes deviations or Part 64 exceedances.
- d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A 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 semiannual 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(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G 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 pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065(6)(C)3 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 EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions 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(6)(C)6 Permit Shield

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The application requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of Section 303 of the Act or Section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(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(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously

emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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.
 - 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; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Clifford Anglin, Vice-President, Trinity Marine Products, Inc.. On October 31, 2009, the Air Pollution Control Program was informed that Mr. Michael Boett, General Manager Composites Group, Trinity Marine Products, Inc. is now the responsible official. 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(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) The Missouri Department of Natural Resources 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,
- 3) 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,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
or
- 5) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(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 D

Construction Permit Number 022001-018 — Styrene Compliance Worksheet

This sheet covers the month of _____ in the year _____.

Column A	Column B	Column C	Column D
Material/Application (Note 1)	EU0010 Amount Used (tons) (Note 2)	Emission Factor (lb styrene/ton material) (Note 3)	Styrene Emissions (pounds) (Note 4)
Spray-up			
Controlled			
Uncontrolled			
Laminate			
Controlled			
Uncontrolled			
Gelcoat			
Controlled			
Uncontrolled			
Other			
Total Styrene Emissions Calculated for this Month (pounds)		(Note 5)	
Total Styrene Emissions Calculated for this Month (tons)		(Note 6)	
12-Month Styrene Emissions Total From Previous Month's Worksheet (tons)		(Note 7)	
Monthly Styrene Emissions Total From Previous Year's Worksheet (tons)		(Note 8)	
Current 12-Month Total Styrene Emissions (tons)		(Note 9)	

- Note 1: Material name or identification number. All resin, gelcoat, laminate or other solutions containing styrene must be reported. If a chemical is used that does not appear in this Table, enter a description in the appropriate spaces.
- Note 2: Total amount of this material used in this type of process at EU0010 during this month.
- Note 3: For spray-up, laminate and gelcoat, the styrene emission factor is found in Table 1 to Subpart WWWW of Part 63 — Organic HAP Emissions Factors. Use the appropriate emission factor for the appropriate application material and method.
- Note 4: Column D = (Column B) x (Column C)
- Note 5: Sum of styrene emissions reported in Column D.
- Note 6: Amount reported in Note 5 divided by 2000.
- Note 7: Running 12-month total of styrene emissions.
- Note 8: Styrene emissions reported for this month in the last calendar year.
- Note 9: Amount reported in Note 7 minus amount reported in Note 8 plus amount reported in Note 6. Less than 100.0 tons indicates compliance

Attachment E

Table 3 to Subpart WWWW of Part 63 — Organic HAP Emissions Limits

As specified in §63.5805, you must meet the following organic HAP emissions limits that apply to you:

If your operation type is:	And you use:	¹ Your organic HAP emissions limit is:
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application	113 lb/ton.
	b. filament application	171 lb/ton.
	c. manual resin application	123 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application	88 lb/ton.
	b. filament application	188 lb/ton.
	c. manual resin application	87 lb/ton.
3. open molding—tooling	a. mechanical resin application	254 lb/ton.
	b. manual resin application	157 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application	497 lb/ton.
	b. filament application	270 lb/ton.
	c. manual resin application	238 lb/ton.
5. open molding—shrinkage controlled resins ²	a. mechanical resin application	354 lb/ton.
	b. filament application	215 lb/ton.
	c. manual resin application	180 lb/ton.
6. open molding—gel coat ³	a. tooling gel coating	440 lb/ton.
	b. white/off white pigmented gel coating	267 lb/ton.
	c. all other pigmented gel coating	377 lb/ton.
	d. CR/HS or high performance gel coat	605 lb/ton.
	e. fire retardant gel coat	854 lb/ton.
	f. clear production gel coat	522 lb/ton.
7. centrifugal casting—CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure	25 lb/ton. ⁴
	b. resin application with the mold closed, and the mold is not vented during spinning and cure	NA—this is considered to be a closed molding operation.
	c. resin application with the mold open, and the mold is vented during spinning and cure	25 lb/ton. ⁴
	d. resin application with the mold open, and the mold is not vented during spinning and cure	Use the appropriate open molding emission limit. ⁵
8. centrifugal casting—non-CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure	20 lb/ton. ⁴
	b. resin application with the mold closed, and mold is not vented during the spinning and cure	NA—this is considered to be a closed molding operation.
	c. resin application with the mold open, and the mold is vented during spinning and cure	20 lb/ton. ⁴
	d. resin application with the mold open, and the mold is not vented during spinning and cure	Use the appropriate open molding emission limit. ⁵
9. pultrusion ⁶	N/A	reduce total organic HAP emissions by at least 60 weight percent.
10. continuous lamination/casting	N/A	reduce total organic HAP emissions by at least 58.5 weight percent or not exceed an organic HAP emissions limit of 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus.

¹ Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

² This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

³ If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a

specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

- ⁴ For compliance purposes, calculate your emission factor using only the appropriate centrifugal casting equation in item 2 of Table 1 to this subpart, or a site specific emission factor for after the mold is closed as discussed in §63.5796.
- ⁵ Calculate your emission factor using the appropriate open molding covered cure emission factor in item 1 of Table 1 to this subpart, or a site specific emission factor as discussed in §63.5796.
- ⁶ Pultrusion machines that produce parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more are not subject to this requirement. Their requirement is the work practice of air flow management which is described in Table 4 to this subpart.

Attachment F

Table 4 to Subpart WWWW of Part 63 — Work Practice Standards

As specified in §63.5805, you must meet the work practice standards in the following Table that apply to you:

For ...	You must ...
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. a new or existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. a new or existing materials HAP-containing materials storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
4. an existing or new SMC manufacturing operation	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. an existing or new SMC manufacturing operation	use a nylon containing film to enclose SMC.
6. all mixing or BMC manufacturing operations ¹	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
7. all mixing or BMC manufacturing operations ¹	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
8. all mixing or BMC manufacturing operations ¹	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
9. a new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	i. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s), ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device, iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s), iv. direct any compressed air exhausts away from resin and wet-out area(s), v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air, vi. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.

¹Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

Attachment G

Table 1 to Subpart WWWW of Part 63 — Organic HAP Emissions Factors ¹

As specified in §63.5810, use the equations in the following Table to calculate Organic HAP Emission Factor (EF) for specific open molding process streams:

Process	Use this organic HAP EF Equation for materials with less than 33% organic HAP (19% organic HAP for nonatomized gel coat) ²³	Use this organic HAP EF Equation for materials with 33% or more organic HAP (19% organic HAP for nonatomized gel coat) ²³
Manual resin application with nonvapor-suppressed resin	EF = 0.126 x %HAP x 2000	EF = {(0.286 x %HAP) – 0.0529} x 2000
Nonatomized mechanical resin application with nonvapor-suppressed resin	EF = 0.107 x %HAP x 2000	EF = {(0.157 x %HAP) – 0.0165} x 2000
Filament application with nonvapor suppressed resin ⁴	EF = 0.184 x %HAP x 2000	EF = {(0.2746 x %HAP) – 0.0298} x 2000
Nonatomized spray gel coat application with nonvapor-suppressed gel coat	EF = 0.185 x %HAP x 2000	EF = {(0.4506 x %HAP) – 0.0505} x 2000

¹ The equations in this Table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in Subpart WWWW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this Table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.

² To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of §63.5810. The organic HAP emission factors have units of lbs of organic HAP per ton of resin or gel coat applied.

³ Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as decimal, i.e., 33% should be input as 0.33, not 33.

⁴ Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

STATEMENT OF BASIS

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) Part 70 Operating Permit Renewal Application, received November 17, 2006;
- 2) Initial Part 70 Operating Permit Number OP2002-043, issued June 24, 2002;
- 3) 2008 Emissions Inventory Questionnaire, received February 11, 2009 (Internet Submittal);
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 5) Air Pollution Control Program Construction Permit No. 1197-025, issued November 3, 1997; and
- 6) Air Pollution Control Program Construction Permit No. 0898-028, issued June 25, 1998.

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit Revisions

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

- 1) Air Pollution Control Program Construction Permit No. 0898-028. Special conditions associated with this construction permit were not incorporated into the operating permit since the emission unit was never installed, nor does the installation have these intentions.
- 2) Construction Permit No. 1197-025A
Special Condition 10: The coordinates for the touchup and repair activity are actually slightly different from the construction permit coordinates of 257377.7 meter easting, 4012450 meters northing. This condition is revised to reflect the actual coordinates of 257335.5 meters easting and 4012744 meters northing.

New Source Performance Standards (NSPS) Applicability

10 CSR 10-6.070, *New Source Performance Regulations*

40 CFR Part 60, *Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978*

40 CFR Part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification commenced After May 18, 1978, and Prior to July 23, 1984*

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*

The resin storage tank is below the level of reporting significance (Subpart K – 40,000 Gallons, Subpart Ka – 40,000 Gallons and Subpart Kb – 19,812.9 Gallons and therefore is not subject to 40 CFR Part 60 Subpart K, Ka or Kb):

Maximum Available Control Technology (MACT) Applicability

1) 40 CFR Part 63, Subpart WWWW — *National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production*

HAP emissions from the fiber glass operations at Trinity Marine Products are covered by this subpart. Trinity has elected to use the facility-wide organic HAP emissions weighted averaging option (§63.5810(c)) to show compliance with Subpart WWWW.

This option in Section 63.5810(c) of the rule, allows the installation to demonstrate compliance with a weighted average emissions limit for all open molding operations. The weighted averages are calculated over the last 12-month period (rolling average). The calculation is done in three steps:

- a) Calculation of the weighted average emissions limit. This is calculated as the sum of each emissions limit multiplied by the amount of each corresponding material used divided by the total material used.
- b) Calculation a weighted average emissions factor. The process is similar to step 1 but uses the equations in Table 1 to Subpart WWWW to estimate actual emissions.
- c) Comparison of the weighted average emissions limit to the weighted average emissions factor. Compliance is demonstrated if the weighted average of the actual emission factors for all resins and gel coat application over a 12-month period does not exceed the weighted average of the organic HAP emission limit.

2) 40 CFR Part 63, Subpart VVVV — *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*

This subpart applies to boat manufacturing facilities with resin and gel coat operations, fabric adhesive operations, or aluminum recreational boat surface coating operations.

Trinity Marine Products manufactures fiberglass covers for steel barges at its Plant #73 and is not a manufacture of boats; therefore Subpart VVVV does not apply to this facility.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M, *National Emission Standard for Asbestos*, §61.145(a), Standard for demolition and renovation, applies to the installation

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and

- Has pre-control emissions that exceed or are equivalent to the major source threshold. 40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Other Regulatory Determinations

- 1) The units listed in the "Emission Units Without Limitations" section in the front of this permit either have no applicable regulations associated with them or are considered insignificant activities by the operating permit application. Those units include, but are not limited to, all natural gas/LPG units with a maximum heat input of less than ten (10) mmBtu/hr and those that burn other fuels and have a heat input of less than one (1) mmBtu/hr.
- 2) 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants and 10 CSR 10-6.400, Restriction of Emission of Particulate Matter, were not applied to the trim area since the minimal particulate emissions are not vented to the ambient air. Any fugitive emissions emitted from this unit will be regulated under 10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin.

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

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

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

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

Prepared by:

Berhanu A. Getahun
Environmental Engineer

CERTIFIED MAIL: 70073020000315696582
RETURN RECEIPT REQUESTED

Mr. Michael Boett
Trinity Marine Products, Inc. - Plant No. 73
P.O. Box 1134
Caruthersville, MO 63830

Re: Trinity Marine Products, Inc. - Plant No. 73, 155-0049
Permit Number: **OP2010-009**

Dear Mr. Boett:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty 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 have any questions or need additional information regarding this permit, please do not hesitate to contact the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:bgk

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII
Southeast Regional Office
PAMS File: 2006-11-082