



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: OP2016-019
Expiration Date: **SEP 06 2021**
Installation ID: 155-0049
Project Number: 2014-04-022

Installation Name and Address

Trinity Marine Products, Inc. Plant No. 73
P.O. Box 1134
Caruthersville, MO 63830
Pemiscot County

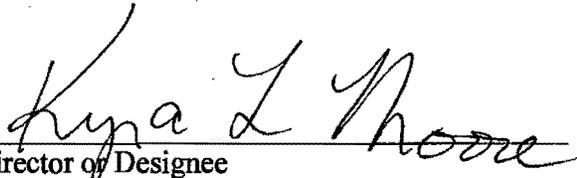
Parent Company's Name and Address

Trinity Marine Products, Inc.
P.O. Box 568887
Dallas, TX 75356-8887

Installation Description:

Trinity Marine Products operates a facility in Caruthersville, Missouri, that manufactures fiberglass covers and access doors for barges. The installation is a major source of volatile organic compounds, primarily styrene, a Hazardous Air Pollutant. The installation is subject to Subpart WWWW of the National Emission Standards for Hazardous Air Pollutants.


Prepared by
Bern Johnson
Operating Permit Unit


Director or Designee
Department of Natural Resources

SEP 06 2016

Effective Date

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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 non-atomized mechanical resin application and non-vapor suppressed resin. The installation is an existing major source of volatile organic compounds (VOC) and styrene, a hazardous air pollutants (HAP). Styrene emissions from the fiberglass operations are covered by 40 CFR 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production. Trinity Marine – Plant 73 is not a named source and fugitive emissions do not count for potential-to-emit calculations.

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 client

Trinity Marine Products operates two separate installations near Caruthersville, MO: Trinity Marine Plant 73 and Plant 75. Plant 75 manufactures barges and has a separate operating permit.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2014	2013	2012	2011	2010
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.03	0.03	0.02	0.02	0.00
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.03	0.03	0.02	0.00	0.00
Sulfur Oxides (SO _x)	0.00	0.00	0.00	0.00	0.00
Nitrogen Oxides (NO _x)	0.34	0.34	0.26	0.41	0.01
Volatile Organic Compounds(VOC)	52.94	29.15	48.79	53.85	66.54
Carbon Monoxide (CO)	0.07	0.07	0.05	0.08	0.00
Styrene (HAPs)	52.92	29.13	48.77	53.83	66.52

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.

2014 EIQ Emission Point #	Description
EP01	Fiberglass lay-up – MHDR 0.603 tons
EP03	Resin storage tank – 13,000 gal
EP04	Fiberglass spray-up – MHDR – 1.0 tons

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.

2014 EIQ Emission Point #	Description
EP02	space heater – MHDR 0.0089 mmft ³ natural gas

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

PERMIT CONDITION PW1

10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 1197-025A, Issued August 18, 2000

Emission Limitation:

- 1) The permittee shall not discharge more than 250.0 tons VOC per year in any consecutive 12-month period. [Special Condition 1]
- 2) The permittee shall not discharge more than 241.1 tons styrene per year in any consecutive 12-month period. [Special Condition 2]
- 3) If a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-6.165, the Director may require the permittee to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. The permittee 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. [modified Special Condition 8]
- 4) The permittee shall perform touchup and repair activities only at the Final Trim Pad. [Special Condition 10]

Monitoring/Record Keeping:

- 1) The permittee shall keep monthly records to determine the VOC emissions, including total quantity of VOC emissions over the previous 12-month period, using Attachment B or an equivalent. [Special Condition 5]
- 2) The permittee shall keep monthly records to determine the styrene emissions, including total quantity of styrene emissions over the previous 12-month period, using Attachments C or an equivalent. [Special Condition 6]
- 3) The permittee shall maintain all records required by this permit for a minimum of five years and shall make them available to any Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.

Reporting:

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

III. Emission Unit Specific Emission Limitations

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

Permit Condition 1	
10 CSR 10-6.060 Construction Permits Required Construction Permit No. 022001-018, Issued February 23, 2001	
Emission Unit	Description
EP-04	Fiberglass spray-up

Emission Limitation:

The permittee shall not discharge more than 100.0 tons styrene per year from EP-04 in any consecutive 12-month period.[Special Condition 2]

Monitoring/Record Keeping:

- 1) The permittee shall keep monthly records to determine the styrene emissions from EP-04, including total quantity of styrene emissions over the previous 12-month period, using Attachment C or an equivalent. [Special Condition 6]
- 2) The permittee shall maintain all records required by this permit for a minimum of five years and shall make them available to any Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the installation exceeded the emission limitation listed above.
- 2) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

Permit Condition 2		
10 CSR 10-6.075 40 CFR Part 63, Subpart WWWW		
National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production		
Emission Unit	Description	Manufacturer/Model #
EP-01	Fiberglass lay-up	custom
EP-04	Fiberglass spray-up	custom

Emission Limitations

The permittee must meet the emission limitations found in Attachment D. [§63.5805(b) and §63.5835(a)]. *(The permittee has elected to use the weighted average emission limit option, §63.5810(c) to show compliance with Subpart WWWW).*

Operational Limitations

- 1) The permittee must meet the operational limitations found in Attachment E. [§63.5805(g)].
- 2) The permittee must demonstrate continuous compliance with each standard above according to the following methods: [§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 Attachment D, 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 Attachment E is demonstrated by performing the work practice required for its' operation. [§63.5900(a)(4)]
- 3) The permittee must meet the organic HAP operational limitations in Attachment E during periods of startup, shutdown, or malfunction unless using an add-on control device. [§63.5900(c) and (d)]

Monitoring:

- 1) The permittee must demonstrate each month that it meets each applicable weighted average of the organic HAP emissions limits in Attachment D. When using this option, the permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all 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 the last 12-month period to determine the organic HAP emissions limit the permittee must meet. To do this, multiply the individual organic HAP emissions limits in Attachment D 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 Attachment D to Subpart WWWW;

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 the weighted average organic HAP emissions factor for open molding. To do this, multiply the 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 the permittee are in compliance. [§63.5810(c)(3)]
- 2) The permittee may use the equations in Table 1 to Subpart WWWW to calculate 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 the permittee to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, the permittee can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided the 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. The permittee may also use the organic HAP emissions factors calculated using the equations in Table 1 to Subpart WWWW, combined with resin and gel coat use data, to calculate organic HAP emissions. [§63.5796]
- 3) In order to determine the organic HAP content of resins and gel coats, the permittee 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, the permittee 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 the permittee 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, the permittee 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 the permittee 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 the permittee must use the measured organic HAP content to determine compliance. [§63.5797(c)]
- 4) If the permittee wishes 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 Subpart WWWW, the permittee 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 Subpart WWWW, 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 Subpart WWWW. 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. EPA will review the submitted data, and, if appropriate, update the equations in Table 1 to Subpart WWWW. [§63.5798(b)]

Recordkeeping:

- 1) The permittee must collect and keep records of resin and gel coat use, organic HAP content (Attachments B & C), and operation where the resin is used if the permittee are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 (see Attachment D) to Subpart WWWW. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [§63.5895(c)]
- 2) The permittee shall keep the records listed in §63.5915(a)(1) and(3). [§63.5915(a)]
 - a) A copy of each notification and report that the permittee submitted to comply with Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted. [§63.5915(a)(1)]
 - b) Records of performance tests, design, and performance evaluations. [§63.5915(a)(3)]

- 3) The permittee shall keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Attachment D. [§63.5915(c)]
- 4) The permittee shall keep a certified statement that the permittee are in compliance with the work practice requirements in Attachment E, as applicable. [§63.5915(d)]
- 5) The permittee shall 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) The permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.5920(b)]
- 7) The permittee shall keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee may keep the records offsite for the remaining 3 years. [§63.5920(c)]

Reporting:

- 1) The permittee shall submit all of the notifications in Table 13 to Subpart WWWW that apply to the permittee by the dates specified. The notifications are described more fully in 40 CFR Part 63, Subpart A, referenced in Table 13 to Subpart WWWW. [§63.5905(a)]
- 2) If the permittee changes any information submitted in any notification, the permittee shall submit the changes in writing to the Director within 15 calendar days after the change. [§63.5905(b)]
- 3) The permittee shall submit each applicable report in Table 14 to Subpart WWWW. [§63.5910(a)]
- 4) Unless the Director has approved a different schedule for submission of reports under §63.10(a), the permittee shall submit each report by the date specified in Table 14 to Subpart WWWW and according to §63.5910(b)(1) through (5). [§63.5910(b)]
 - a) Each compliance report shall 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)]
 - b) Each subsequent compliance report shall 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)]
 - c) 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) that are different than in Subpart WWWW, the permittee 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)]
- 5) The permittee's compliance report shall contain the following information:
 - a) Company name and address. [§63.5910(c)(1)]
 - b) 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)]
 - c) Date of the report and beginning and ending dates of the reporting period. [§63.5910(c)(3)]
 - d) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to the permittee, and there are no deviations from the requirements for work practice standards in Table 4 to Subpart WWWW, 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)]
- 6) 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 the permittee are not using a CMS to comply with the organic HAP emissions

limitations or work practice standards in Subpart WWWW, the compliance report shall 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)]

- a) The total operating time of each affected source during the reporting period. [§63.5910(d)(1)]
 - b) 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)]
- 7) The permittee shall report all deviations as defined in Subpart WWWW in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If the permittee submits a compliance report pursuant to Table 14 to Subpart WWWW 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 the organic HAP emissions limitations listed above (including any operating limit) or work practice requirement in Subpart WWWW, 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)]
- 8) The permittee shall submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to Subpart WWWW, and not based on the requirements in §63.999. [§63.5910(h)]
- 9) Where multiple compliance options are available, the permittee shall state in the next compliance report if compliance options have changed since the last compliance report. [§63.5910(i)]

Permit Condition 3 10 CSR 10-6.075 40 CFR Part 63, Subpart WWWW National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production		
Emission Unit	Description	Manufacturer/Model #
EP-03	Resin storage tank 13,000 gallons, installed 1997	custom

Operational Limitation:

The permittee shall keep all 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]

Monitoring/Record Keeping/Reporting:

The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

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), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect 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) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) 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 submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall 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.

- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) 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.
- 8) 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 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

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 equipment malfunctions contributed to an exceedance.
- 3) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring/Recordkeeping:

None – see Statement of Basis

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.

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.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone
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- 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*

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, 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. 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, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, 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 applicable 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, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, 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, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, 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 APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP 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 APCP 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 contemporaneous written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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)39 Responsible Official

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

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) 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) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 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) MDNR 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 B
 VOC Compliance Worksheet

This worksheet covers the period from _____ to _____
 (month/year) (month/year)

Emission Point	Description	¹ Monthly Usage	Units	² Emission Factor (lbsVOC/unit)	³ Total Monthly Emissions (tons/month)
EP01	Fiberglass lay-up (SCC 30800730)		tons	46.825	
EP02	space heater (SCC 10500206)		mmft^3	5.3	
EP03	Resin storage tank (SCC 40799997)		1000 gal	0.02	
EP04	Fiberglass spray-up (SCC 30800730)		tons	84.87	
⁴Total Monthly Installation-Wide VOC Emissions (tons)					
⁵Total 12-Month Rolling Installation-Wide VOC Emissions (tons)					

¹ Enter total amount of material (indicated in the next column) used in month.
² Emission factor sources are mass balance worksheet from MOEIS for EP01 and 04; Tanks 4.09.d for EP03, and WebFIRE for EP02. If different materials are used for EP01 and 04, new VOC emission factors must be calculated and used in this worksheet.
³ Total monthly emissions = Monthly Usage x Emission Factor x 0.0005.
⁴ Total installation emissions are the sum of the total monthly emissions for each emission point.
⁵ 12-Month Rolling VOC Emissions = Sum of twelve most recent Combined VOC Compliance Worksheets+ the sum of all start-up, shutdown, and malfunction VOC emission during the same 12-month period as reported to the Compliance / Enforcement Section.
12-Month Rolling Total VOC Emissions less than 250 tons/yr indicates compliance.

ATTACHMENT C
 HAP (Styrene) Compliance Worksheet

This worksheet covers the period from _____ to _____
 (month/year) (month/year)

Emission Point	Description	¹ Monthly Usage	Units	² Emission Factor (lbs Styrene/unit)	³ Total Monthly Emissions (tons/month)
EP01	Fiberglass lay-up		tons	46.825	
EP03	Resin storage tank		1000 gal	0.02	
EP04	Fiberglass spray-up		tons	84.87	
⁴Total Monthly Installation-Wide Styrene Emissions (tons)					
⁵Total 12-Month Rolling EP04 Styrene Emissions (tons)					
⁵Total 12-Month Rolling Installation-Wide Styrene Emissions (tons)					

note: styrene is the only HAP used at this installation.

¹ Enter total amount of material (indicated in the next column) used in month.

² Emission factor sources are mass balance worksheet from MOEIS for EP01 and 04; Tanks 4.09.d for EP03, and WebFIRE for EP02. If different materials are used for EP01 and 04, new Styrene emission factors must be calculated and used in this worksheet.

³ Total monthly emissions = Monthly Usage x Emission Factor x 0.0005.

⁴Total installation emissions are the sum of the total monthly emissions for each emission point.

⁵12-Month Rolling Styrene Emissions = Sum of twelve most recent Combined Styrene Compliance Worksheets+ the sum of all start-up, shutdown, and malfunction Styrene emission during the same 12-month period as reported to the Compliance / Enforcement Section..

12-Month Rolling Total Styrene Emissions less than 241.1 tons/yr indicates compliance with PW1.
12-Month Rolling Total Styrene Emissions less than 100 tons/yr from EP04 indicates compliance with Permit Condition 1.

Attachment D

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

As specified in §63.5805, the permittee must meet the following organic HAP emissions limits:

If the operation type is:	And the permittee uses:	¹The organic HAP emissions limit is:
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application	113 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application	88 lb/ton.
3. open molding—tooling	a. mechanical resin application	254 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application	497 lb/ton.
5. open molding—shrinkage controlled resins ²	a. mechanical resin application	354 lb/ton.
6. open molding—gel coat ³	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.
7. 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. The permittee 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 the permittee only applies 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 the permittee use multiple application methods and any portion of a specific gel coat is applied using non-atomized spray, the permittee may use the non-atomized 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.

Attachment E

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

As specified in §63.5805, the permittee must meet the following work practice standards:

For ...	The permittee 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.

<p>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</p>	<ul style="list-style-type: none">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, andvii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.
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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.

APPENDIX A
Abbreviations and Acronyms

% percent	MMCF million cubic feet
°F degrees Fahrenheit	MSDS Material Safety Data Sheet
acfm actual cubic feet per minute	NAAQS National Ambient Air Quality Standards
BACT Best Available Control Technology	NESHAPs National Emissions Standards for Hazardous Air Pollutants
BMC bulk moulding compound	NO_x nitrogen oxides
BMPs Best Management Practices	NSPS New Source Performance Standards
Btu British thermal unit	NSR New Source Review
CAM Compliance Assurance Monitoring	PM particulate matter
CAS Chemical Abstracts Service	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
CEMS Continuous Emission Monitor System	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
CFR Code of Federal Regulations	ppm parts per million
CO carbon monoxide	PSD Prevention of Significant Deterioration
CO₂ carbon dioxide	PTE potential to emit
CO₂e carbon dioxide equivalent	RACT Reasonable Available Control Technology
COMS Continuous Opacity Monitoring System	RAL Risk Assessment Level
CSR Code of State Regulations	SCC Source Classification Code
dscf dry standard cubic feet	scfm standard cubic feet per minute
EIQ Emission Inventory Questionnaire	SDS Safety Data Sheet
EP Emission Point	SIC Standard Industrial Classification
EPA Environmental Protection Agency	SIP State Implementation Plan
EU Emission Unit	SMAL Screening Model Action Levels
fps feet per second	SMC sheet moulding compound
ft feet	SO_x sulfur oxides
GACT Generally Available Control Technology	SO₂ sulfur dioxide
GHG Greenhouse Gas	tph tons per hour
gpm gallons per minute	tpy tons per year
gr grains	VMT vehicle miles traveled
GWP Global Warming Potential	VOC Volatile Organic Compound
HAP Hazardous Air Pollutant	
hr hour	
hp horsepower	
lb pound	
lbs/hr pounds per hour	
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	
Mgal 1,000 gallons	
MW megawatt	
MHDR maximum hourly design rate	
MMBtu Million British thermal units	

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 Application, received April 9, 2014;
- 2) Air Pollution Control Program Construction Permit No. 1197-025, issued November 3, 1997;
- 3) Air Pollution Control Program Construction Permit No. 0898-028, issued June 25, 1998;
- 4) Air Pollution Control Program Construction Permit No. 022001-018, issued February 23, 2001;
- 5) 2014 Emissions Inventory Questionnaire, received January 16, 2015;
- 6) WebFIRE, and
- 7) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined 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.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* and 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter* – these two rules were not applied to this installation because the only source of visible and particulate emissions is the small (0.0089 mmft³/hr) natural gas space heater.

Construction Permit History

- 1) 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:
 - a) Special Condition 8: CSR 10-3.090 was rescinded on November 30, 2010. Control of Emission of Odors is now at 10 CSR 10-6.165
 - b) Special Condition 10: The coordinates listed in the construction permit are off slightly. The previous operating permit had the correct coordinates. The coordinates and activities listed in Special Condition 10 refer to the final trim pad. Permit Condition PW1 now mentions the name, not the grid coordinates.

- 3) Construction Permit No. 022001-018. This permit was issued to allow greater operational flexibility by changing the styrene limits on EP03 and 04. The plantwide VOC and styrene limits were not changed. Styrene is the only HAP used at this installation.

New Source Performance Standards (NSPS) Applicability

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 (75 m³ or 19,812.9 Gallons) and therefore is not subject to 40 CFR Part 60 Subpart Kb.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart WWWW, *National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production* – this subpart applies to the HAP emissions from the fiber glass operations at Trinity Marine Products. 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.

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

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos

containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

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.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)¹
CO	0.78
HAP (styrene)	496.55
NO _x	3.90
PM ₁₀	0.34
PM _{2.5}	0.34
SO _x	0.02
VOC	496.76

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

Other Regulatory Determinations

None

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 APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

A draft of the Part 70 Operating Permit for Trinity Marine Products was placed on public notice on May 6, 2016, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Mark A. Smith of Region VII of the Environmental Protection Agency. The three comments are addressed in the order in which they appear within the letter.

Comment # 1

Permit Condition 2 incorporates the applicable requirements from 40 CFR Part 63, Subpart WWWW: “*National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production*” (MACT WWWW). The following are all directed at Permit Condition 2 as presented in this draft operating permit:

- a) Monitoring requirement 5) appears to be identical to Monitoring requirements 2), 3), and 5) and EPA recommends MDNR eliminate the redundancy.
- b) Monitoring requirement 4) includes “We will review the submitted data...” EPA recommends MDNR define the “We.”
- c) Record keeping requirement 1) requires the permittee collect and keep records of material use, HAP content of material used and the operations where the material is used. MDNR customary practice is to include examples of these data collection records as attachments to the operating permit. However, this draft operating permit on public notice for review does not include examples of the material data collection records. EPA recommends MDNR include an example(s) of Trinity-73’s data collection sheet(s) used to comply with this record keeping requirement as an attachment to the operating permit.
- d) Reporting requirements 2) and 4) require the permittee to notify the “Administrator.” EPA believes the “Director” is a more appropriate contact and suggests MDNR replace the “Administrator” with the “Director.”
- e) Reporting requirement 7) begins: “If the permittee has obtained a title V operating permit... .” This Trinity-73 draft operating permit on public notice for review and comment is a renewal of an existing permit. Therefore, Trinity-73 has in fact obtained a title V operating permit and EPA recommends MDNR modify this requirement to reflect the current status of Trinity-73.

Response to Comment:

The recommended changes were made except for c). The emissions tracking sheets in Attachments B & C already account for these materials. A small addition to the text of Recordkeeping Requirement 1) was made to clarify this.

Comment # 2

Trinity Marine Products owns two (2) separate facilities in Caruthersville, Missouri, each with their own operating permit. Therefore, EPA recommends MDNR provide additional descriptive detail in the installation description which will allow for the public to easily differentiate Trinity-73 from Trinity-75. Additionally, MACT WWWW, which applies to this facility, has different limits and work standards for different source operations. The existing facility description does not include sufficient detail to allow the public to adequately review and confirm the applicable facility requirements. MDNR has included applicable MACT WWWW requirements in the draft operating permit, however, EPA strongly recommends MDNR provide specific facility operations detail to assist in public review of draft permit

conditions. Also, EPA recommends MDNR include only the specific limits and operating standards that are applicable to Trinity-73 source operations.

Response to Comment:

Additional text was added to the Installation Description to address this comment.

Comment # 3

Attachment B (VOC Compliance Worksheet) and Attachment C (Styrene Compliance Worksheet) both reference emission factor source as the “mass balance worksheet for EP01 and EP04”. However, there are no “mass balance” worksheets for EP01 and EP04 attached or appended to this draft permit. EPA strongly recommends MDNR provide examples of these mass balance worksheets as referenced attachments. Also, Attachment E includes work practice standards for existing or new SMC manufacturing operating and a work standard for all mixing or BMC manufacturing operations. The acronyms SMC and BMC are not defined in the draft operating permit and therefore EPA suggests MDNR define these acronyms. Lastly, Attachment D includes limits for continuous lamination/casting source operations. However, the limited installation description in the draft operating permit would seem to indicate that continuous lamination/casting is not an operation at Trinity-73. EPA recommends that Attachments D and E include only the limits and standards that are applicable to the existing Trinity-73 operations.

Response to Comment:

The mass balance worksheets referenced in Attachments B & C are from MOEIS. A statement was added to the text of these attachments. Attachments D & E are Tables 3 & 4 from Subpart WWW. The tables were copied in their entirety and are for reference. Acronyms for SMC and BMC were added to Appendix A.

Response to EPA 45-Day Review Comments

A revised draft of the Part 70 Operating Permit for Trinity Marine Products was sent to EPA Region VII on June 16, 2016 for EPA’s 45-day review. Comments were received from EPA on July 12, 2016.

Comment # 1

EPA's original comment #1, c), submitted under cover dated May 26, 2016, recommended MDNR include an example of the permittee's emissions tracking document that verifies compliance with their hazardous air pollutant (HAP) emission limits, as shown in Attachment D. MDNR's response to this original comment says "(T)he emissions tracking sheets in Attachment B & C already account for these materials." However, Attachment B provides compliance verification for the permittee's volatile organic compound (VOC) emissions; and Attachment C accounts for the permittee's emissions of styrene (a single HAP). EPA still contends that neither of these attachments provides a compliance verification of the permittee's total HAPs and asks for MDNR reconsideration.

Response to Comment:

It is true that Attachment C accounts for only a single HAP, styrene, and not multiple HAPs. This is because styrene is the only HAP emitted by Trinity Marine – Plant 73 in its fiberglass barge cover production plant. The HAP limits in Plantwide Condition PW1 and Permit Condition 1 refer specifically

to styrene. If Trinity Marine – Plant 73 were to modify its process to use or emit other HAPs, it would be required to obtain a construction permit, which would then include new tracking sheets for multiple HAPs. Additional text was added to Attachment C and the Statement of Basis to clarify that styrene is the only HAP present.

Comment #2

The final draft permit includes an example notice MDNR submitted to Affected States and Indian Tribes, informing these entities of the public notice availability of the Trinity Marine – Plant 73 draft operating permit. The notice, attached to this final draft, says "the public notice draft permit will be available no later than November 25, 2014, and comments are due to MDNR no later than December 26, 2014." This draft operating permit was actually placed on public notice May 6, 2016 and comments were due no later than June 5, 2016. It appears the MDNR may wish to revise the Affected State and Indian Tribe notice attached to this final draft operating permit.

Response to Comment:

The oversight was corrected and measures taken to prevent a reoccurrence.

Mr. S. Theis Rice
Trinity Marine Products, Inc. Plant No. 73
P.O. Box 1134
Caruthersville, MO 63830

Re: Trinity Marine Products, Inc. Plant No. 73
Installation 155-0049, Permit Number: OP2016-019

Dear Mr. Rice:

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.

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty 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 contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:bjj

Enclosures

c: PAMS File: 2014-04-022