STATE OF MISSOURI
Matt Blunt, Governor • Doyle Childers, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

MAY 2 4 2007

Mr. Robert Trulaske, President
True Manufacturing
P.O. Box 970
301 Cannonball Lane
O'Fallon, MO 63366

Re: True Manufacturing, 183-0184
Permit Number: **OP2007-018**

Dear Mr. Trulaske:

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

If you have any questions or need additional information regarding this permit, please contact Berhanu Getahun at (314) 416-2960 or me at (573) 751-4817, or write the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS: bgk

Enclosures

c: Ms. Tamara Freeman, U.S. EPA Region VII
Mr. Tom Sims, St. Louis Regional Office
PAMS File: 2003-02-049

Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2007-018
Expiration Date: MAY 2 3 2012
Installation ID: 183-0184
Project Number: 2003-02-049

Installation Name and Address
True Manufacturing
301 Cannonball Lane
P.O. Box 970
O'Fallon, MO 63366
St. Charles County

Parent Company's Name and Address
N/A

Installation Description:
True Manufacturing Company, Inc. manufactures commercial refrigeration equipment, including display cases, food preparation tables, restaurant refrigerators and freezers in O'Fallon Missouri (St. Charles County).

MAY 2 4 2007
Effective Date

Director or Designee
Department of Natural Resources

Table of Contents

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

True Manufacturing Company, Inc. manufactures commercial refrigeration equipment, including display cases, food preparation tables, restaurant refrigerators and freezers in O'Fallon Missouri (St. Charles County). The reported actual emissions for the past five years for the installation are listed below:

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO_x)	Nitrogen Oxides (NO_x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2005	0.29	0.03	3.92	46.51	1.38	0.00	0.33
2004	0.29	0.03	3.83	49.46	1.31	0.00	0.17
2003	0.50	0.03	4.50	53.49	3.78	0.00	1.59
2002	0.47	0.03	4.34	48.26	3.63	0.00	4.29
2001	0.52	0.03	4.44	62.77	3.74	0.00	3.69

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	EIQ Reference #	Description of Emission Unit
EU0010	EP-04	5 Stage Wire Shelf Washers – Primer Application & Cure Ovens
EU0020	EP-05	Wire Shelf Vinyl Powder Coating & Cure Ovens
EU0030	EP-06	Waterborne Paint Dip Coating Line
EU0040	EP-15	8,000 Gallon Gasoline Underground Storage Tank
EU0050	EP-16	Cold Solvent Cleaning – Parts Washers
EU0060	EP-19	Cooler Repair Painting Operations

EMISSION UNITS WITHOUT LIMITATIONS

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

EIQ Reference #	Description of Emission Unit
EP-01a	UV – M & R Printing Presses (2 Screen Printers)
EP-01b	UV – Thieme Printing Presses (4 Screen Printers)
EP-01c	UV – Conquest Printing Press (Screen Printer)
EP-01d	Screen Cleaning Closed Loop System/ Manual Wipe Printer Cleaning
EP-02	Large Format Printer (Scotchprint Laser Printer)
EP-03	Metal Rack Forming
EP-07	Welding & Brazing Operations
EP-08	Cooling Towers

EIQ Reference #	Description of Emission Unit
EP-09	Cooler Cleaning/Wipedown
EP-10	Spray Adhesive Operations (Aerosol Cans)
EP-11	Urethane Foam Operation
EP-12	Wood Cutting/Pallet
EP-13	130 Natural Gas-fired Space Heaters (71.44 MMBtu/hr total)
EP-17	VideoJet Printers (2)
EP-18	Maintenance Garage Operations

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

1) Construction Permit No. 042004-009, Issued March 10, 2004

II. Plant Wide Emission Limitations

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

Permit Condition PW001

10 CSR 10-6.060, Construction Permits Required
Construction Permit No. 042004-009, Issued March 10, 2004
10 CSR 10-6.065, Operating Permits
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

1) True Manufacturing, Incorporated shall emit less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.
[Construction Permit 042004-009: Special Condition Number 1.A.]
2) True Manufacturing, Incorporated shall emit less than ten (10) tons per year of any individual Hazardous Air Pollutants (HAPs) and twenty-five (25) tons per year of total HAPs from the entire installation in any consecutive 12-month period.
[Construction Permit 042004-009: Special Condition Number 1.B.]
3) True Manufacturing, Incorporated shall not change the method of operation or the chemical make-up of any operation which results in the increase of emissions of any HAP, new or existing, to exceed their respective Screen Modeling Action Level (SMAL).
[Construction Permit 042004-009: Special Condition Number 1.C.]

Monitoring/Recordkeeping:

Attachment A, Attachment B and Attachment C or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the Emission Limitation 1 and 2 of this permit condition (Special Conditions 1.A and 1.B of Construction Permit 042004-009). True Manufacturing, Incorporated shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in this equipment.
[Construction Permit 042004-009: Special Condition Number 1.D.]

Reporting:

True Manufacturing, Incorporated shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the end of the month during which the records indicate that the source exceeds the emissions limitations.
[Construction Permit 042004-009: Special Condition Number 1.E.]

Permit Condition PW002

10 CSR 10-6.060, Construction Permits Required
Construction Permit No. 042004-009, Issued March 10, 2004

Operational Limitation:

True Manufacturing, Incorporated shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. True Manufacturing, Incorporated shall provide and maintain suitable,

easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment. [Construction Permit 042004-009: Special Condition Number 3.]

Requirements for Future Emission Alterations for VOCs

If a situation arises such that True Manufacturing alters Special Condition 1A of Construction Permit 042004-009 in order to allow the existing installation to emit more than 100 tons per year of VOCs, the installation shall submit a New Source Review permit application in accordance with Missouri State Rule 10 CSR 10-6.060(7). Such a review shall include a Lowest Achievable Emission Rate (LAER) analysis utilizing current technologies and any other requirements that the Director deems necessary pursuant to 10 CSR 10-6.060(7). Failure to submit a New Source Review application in accordance with this special condition is a violation of this permit. [Construction Permit 042004-009: Special Condition Number 4.]

Requirements for Future Emission Alterations for HAPs

If a situation arises such that True Manufacturing alters Special Condition 1B of Construction Permit 042004-009 in order to allow the existing installation to emit more than 10 tons per year of any individual HAP or 25 tons per year of total HAPs, the installation shall submit a New Source Review permit application in accordance with Missouri State Rule 10 CSR 10-6.060(9). Failure to submit a New Source Review permit application in accordance with this special condition is a violation of this permit. [Construction Permit 042004-009: Special Condition Number 5.]

Permit Condition PW003

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

Emission Limitation:

1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20%.
2) Exception:
   a) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40% opacity.
   b) A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 40%.

Monitoring:

1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2) The following monitoring schedule must be maintained:
   a) Monthly observations shall be conducted for a minimum of eight consecutive months after permit issuance. Should no violation of this regulation be observed during this period then-
   b) Observations must be made semi-annually (i.e., once per reporting period). Observation shall be conducted during the January-June reporting period and during the July-December reporting period. If a violation is noted, monitoring reverts to monthly.
3) If the source reverts to monthly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1) The permittee shall maintain records of all observation results (see Attachments D), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
   b) All emission units from which visible emissions occurred, and
   c) Whether the visible emissions were normal for the process.
2) The permittee shall maintain records of any equipment malfunctions.
3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment E)
4) Attachments D and E contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

Reporting:

1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as 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.

EU0010 through EU0030 – Surface Coating Operations			
Emission Unit	Description	Manufacturer/Model #	2005 EIQ Reference #
EU0010	5-Stage Wire Shelf Washer/Primer (2) & Cure Ovens	Millbank/199 & GAF/2000	EP-04
EU0020	Wire Shelf Powder Coating (2) & Cure Ovens	Millbank/1993 & 1999	EP-05
EU0030	Base Waterborne Dip Coating Line with Curing Oven	GAF/DV24-28/1991 Oven-Black Boy	EP-06

Permit Condition EU0010-001 through EU0030-001

10 CSR 10-6.070
New Source Performance Regulations
40 CFR Part 60 Subpart SS
Standards of Performance for Industrial Surface Coating: Large Appliances

Emission Limitation:
Standard for Volatile Organic Compounds.
On or after the date on which the performance test required by §60.8 of 40 CFR Part 60 is completed, no owner or operator of an affected facility subject to the provisions of this subpart shall discharge or cause the discharge of VOC emissions that exceed 0.90 kilogram of VOC's per liter of applied coating solids from any surface coating operation on a large appliance surface coating line. [§60.452]

Performance Test and Compliance Provisions. [§ 60.453]

1) Sections 60.8(d) and (f) do not apply to the performance test procedures required by this subpart. [§60.453(a)]
2) The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test each calendar month for each affected facility according to the procedures in this paragraph. [§60.453(b)]
   a) An owner or operator shall use the following procedures for any affected facility that does not use a capture system and control device to comply with the emissions limit specified under §60.452. The owner or operator shall determine the composition of the coatings by formulation data supplied by the coating manufacturer or by analysis of each coating, as received, using Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the coating manufacturer to determine the VOC content of coatings using Method 24. The owner or operator shall determine the volume of coating and the mass of VOC-solvent used for thinning purposes from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coatings used at each facility, by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Administrator. [§60.453(b)(1)]
      i) Except as provided in paragraph (b)(1)(iv) of §60.453, the weighted average of the total mass of VOC's consumed per unit volume of coating solids applied each calendar month will be determined as follows. [§60.453(b)(1)(i)]

(1) Calculate the mass of VOC's consumed ($M_o + M_d$) during the calendar month for each affected facility by the following equation: [§60.453(b)(1)(i)(A)]

$$M_o + M_d = \sum_{i=1}^{n} L_{ci} D_{ci} W_{oi} + \sum_{j=1}^{m} L_{dj} D_{dj} \qquad (1)$$

($\Sigma L_{dj} D_{dj}$ will be 0 if no-VOC solvent is added to the coatings as received)

Where:

M_o = the mass of VOC's in coatings consumed, as received (kilograms)
M_d = the mass of VOC-solvent added to coatings (kilograms)
L_c = the volume of coating consumed, as received (liters)
D_c = density of coating (or input stream), as received (kilograms per liter)
L_d = the volume of VOC-solvent added to coatings (liters)
D_d = density of VOC-solvent added to coatings (kilograms per liter)
W_o = the portion of VOC's in a coating (or input stream), as received (fraction by weight)
n = the number of different coatings used during the calendar month
m = the number of different VOC-solvents added to coatings during the calendar month

(2) Calculate the total volume of coating solids used (L_s) in the calendar month for each affected facility by the following equation: [§60.453(b)(1)(i)(B)]

$$L_s = \sum_{i=1}^{n} L_{ci} V_{si} \qquad (2)$$

Where:

L_s = the volume of coating solids consumed (liters)
L_c = the volume of coating consumed, as received (liters)
V_s = the portion of solids in coating (or input stream), as received (fraction by volume)
n = the number of different coatings used during the calendar month

(3) Select the appropriate transfer efficiency from Table 1. If the owner or operator can demonstrate to the satisfaction of the Administrator that transfer efficiencies other than those shown are appropriate, the Administrator will approve their use on a case-by-case basis. Transfer efficiencies for application methods not listed shall be determined by the Administrator on a case-by-case basis. An owner or operator must submit sufficient data for the Administrator to judge the accuracy of the transfer efficiency claims. [§60.453(b)(1)(i)(C)]

Table 1 – Transfer Efficiencies

Application Method	Transfer Efficiency (T_k)
Air-atomized spray	0.40
Airless spray	0.45
Manual electrostatic spray	0.60
Flow coat	0.85
Dip Coat	0.85
Nonrotational automatic electrostatic spray	0.85
Rotating head automatic electrostatic spray	0.90
Electrodeposition	0.95

Where more than one application method is used within a single surface coating operation, the owner or operator shall determine the composition and volume of each coating applied by each method through a means acceptable to the Administrator and compute the weighted average transfer efficiency by the following equation:

$$T = \frac{\sum_{i=1}^{n}\sum_{k=1}^{m} L_{cik} V_{sik} T_k}{L_s} \qquad (3)$$

Where:

T = transfer efficiency (fraction)
L_c = the volume of coating consumed, as received (liters)
V_s = the portion of solids in coating (or input stream), as received (fraction by volume)

(4) Calculate the volume-weighted average mass of VOC's consumed per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation: [§60.453(b)(1)(i)(D)]

$$G = \frac{M_o + M_d}{L_s T} \qquad (4)$$

Where:

M_o = the mass of VOC's in coatings consumed, as received (kilograms)
M_d = the mass of VOC-solvent added to coatings (kilograms)
L_s = the volume of coating solids consumed (liters)
T = transfer efficiency (fraction)

ii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the calendar month for each affected facility by the following equation: [§60.453(b)(1)(ii)]

$$N = G \qquad (5)$$

iii) Where the volume-weighted average mass of VOC's discharged to the atmosphere per unit volume of coating solids applied (N) is equal to or less than 0.90 kilogram per liter, the affected facility is in compliance. [§60.453(b)(1)(iii)]

iv) If each individual coating used by an affected facility has a VOC content, as received, which when divided by the lowest transfer efficiency at which the coating is applied, results in a value equal to or less than 0.90 kilogram per liter, the affected facility is in compliance, provided no VOC's are added to the coating during distribution or application.
[§60.453(b)(1)(iv)]

Reporting and Recordkeeping:

1) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under §60.452. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually. [§60.455(b)]
2) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine VOC emissions from each affected facility. [§60.455(d)]

Permit Condition EU0010-002 through EU0030-002

10 CSR 10-5.330
Control of Emissions From Industrial Surface Coating Operations

Emission Limitation:

The permittee shall not emit or discharge into the atmosphere any VOC from large appliance surface coating line in excess of 2.8 lbs. VOC/gallon (minus water and non-VOC organic compounds) from top coat operation. [1]

Monitoring:

The permittee shall use one of the following methods for determining the daily volume-weighted average pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):

1) Application of compliant coatings with records sufficient to demonstrate that the VOC content of each top coating applied is less than 2.8 pounds per gallon of coating (minus water and non-VOC organic compounds). Or
2) Calculate the daily volume-weighted average ($DAVG_{VW}$) of all coatings used as delivered to the coating applicator(s) using the following formula found at 10 CSR 10-5.330(5)(B), only if any non-compliant coating(s) is applied:

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

Where:

A = daily gallons each coating used (minus water and exempt solvents)
B = lbs. VOC/gal. coating (minus water and exempt solvents)
C = total daily gallon coatings used (minus water and exempt solvents)
n = number of all coatings used

a) The permittee shall determine on a daily basis the volume of coatings consumed, as delivered to the coating applicator(s).
b) The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA

[1] *VOC Emission Limitation from 10 CSR 10-5-330(5)(B) Table B – VOC Emission Limit Based on Weight of VOC per Gallon of Coating (minus water and non-VOC organic compounds)*

Reference Method 24. MDNR may require the owner or operator who uses formulation data supplied by the manufacturer of the coating to determine data used in the calculation of the VOC content of coatings by EPA Reference Method 24 or an equivalent or alternative method.

3) If the volume-weighted average mass of VOC per volume of coating (minus water and non-VOC organic compounds), calculated on a daily basis, is less than 2.8 lbs. VOC/gallon , the source is in compliance. Each daily calculation is a performance test for the purpose of determining compliance with 10 CSR 10-5.330(5)(B).

Recordkeeping:

1) The permittee who uses compliance coatings as required by Monitoring 1 of this permit condition to meet the applicable emission limitations shall maintain a record of the VOC content, in lbs per gallon (Material Safety Data Sheets, etc.), of all coatings used in this surface coating operation.
2) The permittee who uses daily volume-weighted average as required by Monitoring 2 of this permit condition to comply with the applicable emission limitation shall maintain the following records:
   a) The owner or operator of a coating line shall keep records detailing specific VOC sources, as necessary to determine compliance (see Attachments F and G). These may include:
      i) The type and the quantity of coatings used daily;
      ii) The coatings manufacturer's formulation data for each coating;
      iii) The type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
      iv) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
      v) The type and quantity of waste solvents reclaimed or discarded daily;
      vi) The quantity of pieces of materials coated daily; and
      vii) Any additional information pertinent to determine compliance.
   b) Records such as daily production rates may be substituted for actual daily coating use measurement provided the owner submits a demonstration approvable by the director that such records are adequate for the purpose of this rule. This will apply until EPA issues national daily emissions recordkeeping protocols for specific industrial classifications.

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

EU0040 – 8,000 Gallon Gasoline Underground Storage Tank			
Emission Unit	Description	Manufacturer/ Model #	2005 EIQ Reference #
EU0040	8,000 Gallon Gasoline Underground Storage Tank		EP-15

Permit Condition EU0040-001

10 CSR 10-5.220
Control of Petroleum Storage, Loading and Transfer

Operational Limitation/Equipment Specifications:

No owner or operator of a gasoline storage tank or delivery vessel shall cause or permit the transfer of gasoline from a delivery vessel into a gasoline storage tank with a capacity greater than five-hundred (500) gallons unless—

1) The storage tank is equipped with a submerged fill pipe extending unrestricted to within six inches (6") of the bottom of the tank, and not touching the bottom of the tank, or the storage tank is equipped with a system that allows a bottom fill condition;

2) All storage tank caps and fittings are vapor-tight when gasoline transfer is not taking place; and
3) Each storage tank is vented via a conduit that is—
   a) At least two inches (2") inside diameter;
   b) At least twelve feet (12') in height above grade; and
   c) Equipped with a pressure/vacuum valve that is CARB certified at three inches water column pressure/eight inches water column vacuum (3"wcp/8"wcv) except when the owner or operator provides documentation that the system is CARB certified for a different valve and will not function properly with a 3"wcp/8"wcv valve.

Recordkeeping:
The permittee shall keep records documenting the vessel owners and number of delivery vessels unloaded by each owner. Records shall be kept for two (2) years and shall be made available to the staff director within five (5) days of a request. The owner or operator shall on-site copies of the loading ticket, manifest or delivery receipt for each grade of product received, subject to examination by the staff director upon request. If a delivery receipt is retained rather than a manifest or loading ticket, the delivery ticket shall bear the following information: vendor name, date of delivery, quantity of each grade, point of origin, and the manifest or loading ticket number. The required retention on-site of the loading ticket, manifest or delivery receipt shall be limited to the four (4) most recent records for each grade of product.

Reporting:
Reports of any deviations from any of the terms imposed by this regulation shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU0050 – Cold Solvent Cleaning (Parts Washers)			
Emission Unit	Description	Manufacturer/ Model #	2005 EIQ Reference #
EU0050	Cold Solvent Cleaning (Parts Washers)	Safety-Kleen	EP-16

Permit Condition EU0050-001

10 CSR 10-5.300
Control of Emissions from Solvent Cleaning

Emission Limitation:
1) The permittee shall not use cold cleaning solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)).
2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The director and the U.S Environmental Protection Agency (EPA) must approve the alternative method.

Operational Limitation/Equipment Specifications:
1) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
2) When one or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
   a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8 degrees Celsius (37.8°C) (100 degrees Fahrenheit (100°F));
   b) The solvent is agitated; or
   c) The solvent is heated.

3) Each cold cleaner shall have a internal drainage facility so that parts are enclosed under the cover while draining.
4) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
5) Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or is heated above 48.9°C (120°F), must use one of the following control devices:
   a) A freeboard ratio of at least 0.75;
   b) Water cover (solvent must be insoluble in and heavier than water); or
   c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65%. These control systems must receive approval from the director and EPA prior to their use.
8) Each cold cleaner shall be operated as follows:
   a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
   b) Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining, the parts shall be positioned so that the solvent drains directly back to the cold cleaner.
   c) Whenever a cold cleaner fails to perform within the rule operating requirements, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the rule operating requirements.
   d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down until the leaks are repaired.
   e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the director and EPA:
      i) Reduction of the waste material to less than 20% VOC solvent by distillation and proper disposal of the still bottom waste; or
      ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the director and EPA.
   f) Waste solvent shall be stored in covered containers only.
9) Operators must be trained as follows:
   a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process to operate this equipment;
   b) The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operators; and
   c) A procedural review shall be given to all solvent metal cleaning equipment operators at least once each 12 months.

Monitoring/Recordkeeping:

1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment K):
   a) Name and address of the solvent supplier.
   b) Date of purchase.
   c) Type of solvent purchased.
   d) Vapor pressure of solvent in mm Hg at 20°C or 68°F.
2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (see Attachment I). The record also shall include maintenance and repair logs that occurred on the degreaser (Attachments J). These records shall be kept current and made available

for review on a monthly basis. The director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule.

3) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment L).
4) All records shall be retained for five years and be available to the director upon request.

Reporting:

Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU0060 – Cooler Repair Painting Operations			
Emission Unit	Description	Manufacturer/Model #	2005 EIQ Reference #
EU0060	Cooler Repair Painting Operations with Carbon Absorption Canisters and Air Filters		EP-19

Permit Condition EU0060-001

10 CSR 10-6.070
New Source Performance Regulations
40 CFR Part 60 Subpart SS
Standards of Performance for Industrial Surface Coating: Large Appliances

Emission Limitation:

Standard for Volatile Organic Compounds.

On or after the date on which the performance test required by §60.8 of 40 CFR Part 60 is completed, no owner or operator of an affected facility subject to the provisions of this subpart shall discharge or cause the discharge of VOC emissions that exceed 0.90 kilogram of VOC's per liter of applied coating solids from any surface coating operation on a large appliance surface coating line. [§60.452]

Performance Test and Compliance Provisions. [§ 60.453]

1) Sections 60.8(d) and (f) do not apply to the performance test procedures required by this subpart. [§60.453(a)]
2) The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test each calendar month for each affected facility according to the procedures in this paragraph. [§60.453(b)]
   a) An owner or operator shall use the following procedure for any affected facility that uses a control device for VOC recovery (e.g., carbon adsorber) to comply with the applicable emission limit specified under §60.452. [§60.453(b)(3)]
      i) Calculate the total mass of VOC's consumed ($M_o + M_d$) and the volume-weighted average of the total mass of VOC's per unit volume of applied coating solids (G) during each calendar month for each affected facility using equations (1), (2), (3) if applicable, and (4), listed in Permit Condition EU0010-002 through EU0030. [§60.453(b)(3)(i)]
      ii) Calculate the total mass of VOC's recovered (M_r) during each calendar month using the following equation: [§60.453(b)(3)(ii)]

$$M_r = L_r D_r \qquad (10)$$

Where:

M_r = the mass of VOC's recovered by an emission control device (kilograms).

L_r = the volume of VOC-solvent recovered by an emission control device (liters).
D_r = density of VOC-solvent recovered by an emission control device (kilograms per liter)

iii) Calculate overall reduction efficiency of the control device (R) for each calendar month for each affected facility using the following equation: [§60.453(b)(3)(iii)]

$$R = \frac{M_r}{M_o + M_d} \qquad (11)$$

iv) Calculate the volume-weighted average mass of VOC's emitted to the atmosphere (N) for each calendar month for each affected facility using equation (9). [§60.453(b)(3)(iv)]

$$N = G(1 - R) \qquad (9)$$

Where:

N = the volume-weighted average mass of VOC's emitted to the atmosphere per unit volume of applied coating solids (kilograms per liter).
R = the overall VOC emission reduction achieved for an affected facility (fraction).
G = the volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of applied coating solids (kilograms per liter).

v) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is equal to or less than 0.90 kilogram per liter of applied coating solids, the affected facility is in compliance. Each monthly calculation is considered a performance test. [§60.453(b)(3)(v)]

Reporting and Recordkeeping:

1) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under §60.452. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually. [§60.455(b)]
2) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine VOC emissions from each affected facility. Where compliance is achieved through the use of a solvent recovery system, the owner or operator shall maintain at the source daily records of the amount of solvent recovered by the system for each affected facility. [§60.455(d)]

Permit Condition EU0060-002

10 CSR 10-5.330
Control of Emissions From Industrial Surface Coating Operations

Emission Limitation:

The permittee shall not emit or discharge into the atmosphere any VOC from large appliance surface coating line in excess of 6.5 lbs. VOC/gallon (minus water and non-VOC organic compounds) from final repair coating operation. [2]

Monitoring:

The permittee shall use one of the following methods for determining the daily volume-weighted average pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):

[2] *VOC Emission Limitation from 10 CSR 10-5-330(5)(B) Table B – VOC Emission Limit Based on Weight of VOC per Gallon of Coating (minus water and non-VOC organic compounds)*

1) Application of compliant coatings with records sufficient to demonstrate that the VOC content of each final repair coating applied is less than 6.5 pounds per gallon of coating (minus water and non-VOC organic compounds); or
2) Calculate the daily volume-weighted average ($DAVG_{VW}$) of all coatings used as delivered to the coating applicator(s) using the following formula found at 10 CSR 10-5.330(5)(B), only if any non-compliant coating(s) is applied:

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

Where:

A = daily gallons each coating used (minus water and exempt solvents)
B = lbs. VOC/gal. coating (minus water and exempt solvents)
C = total daily gallon coatings used (minus water and exempt solvents)
n = number of all coatings used

   a) The permittee shall determine on a daily basis the volume of coatings consumed, as delivered to the coating applicator(s).
   b) The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24. MDNR may require the owner or operator who uses formulation data supplied by the manufacturer of the coating to determine data used in the calculation of the VOC content of coatings by EPA Reference Method 24 or an equivalent or alternative method.
3) If the volume-weighted average mass of VOC per volume of coating (minus water and non-VOC organic compounds), calculated on a daily basis, 6.5 lbs. VOC/gallon (minus water and non-VOC organic compounds) for final repair coatings. Each daily calculation is a performance test for the purpose of determining compliance with 10 CSR 10-5.330(5)(B).

Recordkeeping:

1) The permittee who uses compliance coatings as required by Monitoring 1 of this permit condition to meet the applicable emission limitations shall maintain a record of the VOC content, in lbs per gallon (Material Safety Data Sheets, etc.), of all coatings used in this surface coating operation.
2) The permittee who uses daily volume-weighted average as required by Monitoring 2 of this permit condition to comply with the applicable emission limitation shall maintain the following records:
   a) The owner or operator of a coating line shall keep records detailing specific VOC sources, as necessary to determine compliance (see Attachments F and G). These may include:
      i) The type and the quantity of coatings used daily;
      ii) The coatings manufacturer's formulation data for each coating;
      iii) The type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
      iv) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
      v) The type and quantity of waste solvents reclaimed or discarded daily;
      vi) The quantity of pieces of materials coated daily; and
      vii) Any additional information pertinent to determine compliance.
   b) Records such as daily production rates may be substituted for actual daily coating use measurement provided the owner submits a demonstration approvable by the director that such records are adequate for the purpose of this rule. This will apply until EPA issues national daily emissions recordkeeping protocols for specific industrial classifications.

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

Permit Condition EU0060-003

10 CSR 10-6.060, Construction Permits Required
Construction Permit No. 042004-009, Issued March 10, 2004

Operational Limitation/Equipment Specifications:

Control Device – Carbon Absorption Canisters and Air Filters (CD-1)

1) True Manufacturing shall control Particulate Matter less than ten microns in diameter (PM10) from the Cooler Repair Painting Operations (EP-19) using air filters as specified in the permit application. The use of the spray booth(s) shall only occur with the air filters in operation. To ensure the proper function of the air filters, the following shall be done:
   a) The filter area shall be maintained such that the pressure drop remains in the normal operating range (0.5 to 3.5 pounds per square inch), whenever the emission unit(s) is in operation.
   b) Check and document the filter pressure drop weekly. If the pressure drop falls out of the normal operating range, corrective action shall be taken to return the pressure drop to normal.
   c) Thoroughly inspect the air filters for leaks and wear quarterly.
   d) If leaks or abnormal conditions are detected the appropriate measures for remediation shall be implemented.
   e) True Manufacturing shall maintain an operating and maintenance log for the air filters which shall include the following:
      i) Weekly filter house pressure drop indicator readings, dates of filter replacement, incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
      ii) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
      [Construction Permit 042004-009: Special Condition Number 2.A.]
2) True Manufacturing shall control VOCs from the paint booth (EP-19) using carbon absorption canisters as specified in the permit application. The carbon absorption canisters shall be tested to determine the VOC breakthrough point as a function of the amount of solvent used (in gallons). This VOC breakthrough test shall be made available immediately to any Missouri Department of Natural Resources' personnel upon request. [Construction Permit 042004-009: Special Condition Number 2.B.]
3) True Manufacturing shall replace the carbon absorption canisters when the solvent usage is at most ninety percent (90%) of the breakthrough point tested in Special Condition 2(B). [Construction Permit 042004-009: Special Condition Number 2.C.]

Recordkeeping:

1) Attachment H or equivalent forms shall be used to demonstrate compliance with Special Condition 2(C). True Manufacturing shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Construction Permit 042004-009: Special Condition Number 2.D.]
2) True Manufacturing shall maintain an operating and maintenance log for the carbon absorption canisters which shall include the following:
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
   [Construction Permit 042004-009: Special Condition Number 2.E.]

IV. Core Permit Requirements

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

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required
The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits
The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information
1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential
This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention
The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin
1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:

a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
b) Paving or frequent cleaning of roads, driveways and parking lots;
c) Application of dust-free surfaces;
d) Application of water; and
e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

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

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, or to fires used for recreational purpose, or to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

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

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

10 CSR 10-5.070 Open Burning Restrictions

1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
   a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
   b) The schedule of burning operations;

c) The exact location where open burning will be used to dispose of the trade wastes;
d) Reasons why no method other than open burning is feasible; and
e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.

4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt True Manufacturing from the provisions of any other law, ordinance or regulation.
5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-5.160 Control of Odors in the Ambient Air

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:
1) Residential, recreational, institutional, retail sales, hotel or educational premises.
2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
3) Premises other than those in 1. and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed. **This requirement is not federally enforceable.**

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

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:
1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from theses sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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

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

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

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

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

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

f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

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

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

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

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements

1) Recordkeeping
   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) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
   c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
   d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
      ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
      iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no

later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

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

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

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

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

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios
None

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

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

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

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
b) That the installation was being operated properly,
c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
   b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
   c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

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

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause
This permit may be reopened for cause if:

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

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis
This permit is accompanied by a statement setting forth the legal and factual basis for the draft 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 A
Construction Permit No. 042004-009
VOC Compliance Worksheet for Coatings and Solvents

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

Column A	Column B	[1] Column C	[2] Column D	Column E	[3] Column F	[4] Column G
Coating/Solvent/ Emission Unit Identification	Monthly Amount of Materials Used (gallons)	Density of Material (lbs/gal)	% Wt. Volatile of Material (% wt)	VOC Emission Factor (lbs/gal)	VOC Emissions (tons)	VOC 12-Month Total Emissions (tons)

1. Column C = (8.34 lbs/gal x SG);
   8.34 lbs/gal = density of H_2O, and
   SG = specific gravity of material (obtained from MSDS)
2. Column D = Volatile percentage by weight of the material, obtained from MSDS
3. Column F = $\left[\frac{Column\ B \times Column\ C}{2000} \times \frac{Column\ D}{100}\right] = \left[\frac{Column\ B \times Column\ C}{2000}\right]$
4. Column G = Rolling 12-month total from previous worksheets (Attachment A) plus Column F. Total shall be less than 100 tons of VOC in any consecutive 12-month period.

Attachment B
Construction Permit No. 042004-009
Individual HAP Compliance Worksheet

HAP Name: _____ CAS No.: _____ SMAL: _____

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

Column A	Column B	[1] Column C	[2] Column D	[3] Column E	[4] Column F
Coating/Solvent/ Emission Unit Identification	Monthly Amount of Materials Used (gallons)	Density of Material (lbs/gal)	% Wt. HAP of Material (% wt)	HAP Emissions (tons)	HAP 12-month Total (tons)

1. Column C = (8.34 lbs/gal x SG);
   8.34 lbs/gal = density of H_2O, and
   SG = specific gravity of material (obtained from MSDS)
2. Column D = Percent by weight of the HAP present in the material, obtained from MSDS
3. Column E = $\left[\frac{Column\ B \times Column\ C}{2000} \times \frac{Column\ D}{100}\right]$
4. Column F = Rolling 12-month total from previous worksheets plus Column E. A 12-Month Individual HAP emissions total of less than 10.0 tons or below their respective Screen Modeling Action Level (SMAL) indicates compliance. Screen Modeling Action Levels for individual HAPs can be found in the "Supplemental Information Package" of the construction permit application (page 21).

Attachment C
Construction Permit No. 042004-009
Aggregate HAP Compliance Worksheet in a 12-month Period

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

Column A	[1] Column B
HAP Identification	HAP Emissions (tons/12-month period)

1. Column B = Emissions for a specific HAP, obtained from Attachment B
2. Total = Sum of Column B; total shall be less than 25 tons in any 12-month period.

Attachment D
10 CSR 10-6.220 Compliance Demonstration
Opacity Emission Observations

This attachment or an equivalent may be used to help meet the recordkeeping requirements of Permit Condition PW003.

Method 22 Opacity Emission Observations			
Date	Method 22 Test Observer	Visible Emissions (yes/no)	If Visible emissions, was a method 9 done? (yes/no)

Attachment E

10 CSR 10-6.220 Compliance Demonstration
Method 9 Visual Determination of Opacity

This attachment or an equivalent may be used to help meet the recordkeeping requirements of Permit Condition PW003.

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.
Was the emission unit in compliance at the time of evaluation? _____ _____ _____
YES NO Signature of Observer

Attachment F

10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*
Compliance Demonstration - Sample Record Form

Daily Record of Substances Used for Coating, Thinning, Purging, and Equipment Cleaning Record

Date	Substance	CAS	Gallons Used Daily	Lbs VOC/gal (less water & non-VOC organic compounds)	Purpose (used for)

Attachment G

10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*

Compliance Demonstration - Sample Record Form

Daily Calculation of Compliance with Emission Limit

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H
Date	Coating Ingredient	Gallons Used Daily	Density (lbs/gal)	VOC Fraction By Weight	Lbs VOC/gal (less water & Non VOC Organic Compounds)	Lbs of VOC per Day (Column C x Column F)	$DAVG_{vw}$ [1]
Example of using the table:							
11/29/05	Ingredient A	25	7.85	0.30	2.35	58.75	-----
11/29/05	Ingredient B	30	8.22	0.25	2.05	61.50	-----
Daily Sum:	-----	55	-----	-----		120.25	**2.19**

Notes:
– $DAVG_{vw}$ = Daily Volume-Weighted Average (lbs/gal)

Instructions:
1) Column F = [Column D] x [Column E]
   Calculate lbs of VOC per gallon of coating ingredient in Column F by multiplying ingredient's density (Column D) by VOC's content in the ingredient (Column E).
2) Column G = [Column C] x [Column F]
   Calculate pounds of VOC per ingredient per day in Column G by multiplying gallons of ingredient used daily (Column C) times lbs of VOC per gallon of ingredient (Column F)
3) Calculate Daily Volume-Weighted Average - (lbs/gal) in Column H as the daily sum of gallons of VOC (Column G) divided by the daily sum of gallons of all coating ingredients used.
4) Calculated value of $DAVG_{vw}$ if less than the VOC per gallon of coating limit indicates compliance.

Attachment H
Construction Permit No. 042004-009
Solvent Usage Tracking Worksheet

Breakthrough Point (Gallons)*: _____

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

Column A	Column B	**Column C	Column A	Column B	**Column C
Carbon Absorption Canister Installation Date	Date	*Weekly Amount of Solvent/Coating Used (gallons)	Carbon Absorption Canister Installation Date	Date	*Weekly Amount of Solvent/Coating Used (gallons)

* Determined by testing required by Special Condition 2.B. of Construction Permit 042004-009
** Carbon absorption canisters shall be replaced within 90% of the breakthrough point.

Attachment I

10 CSR 10-5.300 Compliance Demonstration
Solvent Containing Waste Transfer Log

Date	Amount of Total Solvent Transferred (gallons)	Amount of Solvent Transferred to a Contract Reclamation Service (gallons)	Amount of Solvent Transferred to a Disposal Facility (gallons)	Amount of Solvent Distilled on the Premises (gallons)

Attachment J

10 CSR 10-5.300 Compliance Demonstration Inspection/Maintenance/Repair/Malfunction Log

Date	Equipment/Emission Unit	Activities Performed

Attachment K

10 CSR 10-5.300 Compliance Demonstration
Purchase Records for Cold Cleaning Solvent

Date	Solvent Supplier Name	Solvent Supplier Address	Type of Solvent	Solvent Volatility in mmHg at 20°C (68°F)

Attachment L

10 CSR 10-5.300 Compliance Demonstration
Employee Solvent Metal Cleaning Training Log

Date	Title of Solvent Metal Cleaning Training Course	Instructor

STATEMENT OF BASIS

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

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

1) Intermediate Operating Permit Application, received Feb 6, 2003;
2) 2005 Emissions Inventory Questionnaire, received March 23, 2006;
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition; and
4) Consent Decree, Civil Action No. 4:04CV00495JCH

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

10 CSR 10-6.070, *New Source Performance Regulations*
40 CFR Part 60, *Subpart SS, Standards of Performance for Industrial Surface Coating: Large Appliances*

The affected facility subject to Subpart SS is each surface coating operation in a large appliance surface coating line. A "large appliance product" is defined in the regulation as an organic surface-coated metal range, oven, microwave oven, refrigerator, freezer, washer, dryer, dishwasher, water heater, or trash compactor manufactured for household, commercial, or recreational use.

True Manufacturing both manufactures and coats parts of commercial refrigeration equipment (i.e., restaurant refrigerators and freezers), the installation's surface coating operations are subject to Subpart SS. Therefore True Manufacturing will be required to comply with the requirements of Subpart SS.

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-5.340, *Control of Emissions from Rotogravure and Flexographic Printing Facilities*
10 CSR 10-5.442, *Control of Emissions from Lithographic Printing Operations*
These rules do not apply to this installation because all printing is processed using silkscreen presses.

10 CSR 10-5.455, *Control of Emissions from Solvent Cleanup Operations*
This rule applies to installations in the St. Louis City and the Counties of Jefferson, St. Charles, Franklin, and St. Louis with any cleaning operation involving the use of a volatile organic compound (VOC) solvent or solvent solution. The provisions of this rule shall not apply to any stationary source at which cleaning solvent VOCs are emitted at less than five hundred (500) pounds per day.

VOC emissions from the solvent cleaning operations [Manual Wipe Printer Cleaning and Cooler Cleaning/Wipedown] are less than the applicability threshold of 500 lbs/day. Therefore, this regulation does not apply to this installation.

10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*
The facility has a total of 134 space heaters (EP-13) of various capacities with a total heat input of 71.49 MMBtu/hr (individual heat input rates less than 10 MMBtu/hr) are subject to the requirements of this rule. However, the APCP does not consider these units to be capable of exceeding the particulate matter (PM) emission limitation (0.22 pounds of particulate matter per million BTU's of heat input) of this rule.

Therefore, as shown in the following calculations, the space heaters are always expected to be in compliance with the PM limitation, this rule was not included in the applicable requirements section of this operating permit.

Regulatory PM Limit:
$E = 0.80(Q)^{-0.301}$ Where: E = allowable PM emissions in lb/MMBtu/hr
Q = Total installation heat input in MMBtu/hr
$E = 0.80(71.49)^{-0.301} = 0.22$ lb/MMBtu/hr

Conservatively assuming 1050 Btu per standard cubic foot of natural gas and using the PM emission factor 7.6 lb/MMscf for natural gas combustion (AP-42, Sections 1.4, July 1998); the potential emission is 0.0072 lb/MMBtu.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
All combustion equipment at the installation uses pipeline grade natural gas. Combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels is exempt from the requirements of this rule.

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

Four (4) Thieme Screen Printing Presses (EP-01b) that use ultraviolet (UV) light to cure the ink listed as part of the equipment permitted in the Construction Permit #042004-009 is no longer being operated. Therefore, these presses re not included in the operating permit.

New Source Performance Standards (NSPS) Applicability
10 CSR 10-6.070, *New Source Performance Regulations*
40 CFR Part 60, *Subpart SS, Standards of Performance for Industrial Surface Coating: Large Appliances*

These rule applies to 5-Stage Wire Shelf Washer/Primer (2) & Cure Ovens (EP-05), Wire Shelf Powder Coating (2) & Cure Ovens (EP-06), Base Waterborne Dip Coating Line with Curing Oven (EP-07) and Cooler Repair Painting Operations (EP-19) which are part of the surface coating operation in a large appliance surface coating line.

Maximum Available Control Technology (MACT) Applicability
10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*
40 CFR Part 63, Subpart NNNN—*National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances*

The installation was issued a construction permit # 042004-009 on March 10, 2004 (before the compliance date of subpart NNNN) that imposes a plantwide condition for limiting the plantwide HAP emission to less than 10 tons per year of individual HAPs and 25 tons per year of combined HAPs. Therefore, True Manufacturing is not a major source of HAP emissions and is not subject to 40 CFR Part 63, Subpart NNNN—*National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances.*

40 CFR Part 63, Subpart MMMM, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products*, Subpart PPPP, *National Emissions Standards for Hazardous Air Pollutants Surface Coating of Plastic Parts and Products*, and Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants: Industrial/Commercial/Institutional Boilers and Process Heaters* do not apply to this installation because the installation is not, due to the conditions in the Construction Permit # 042004-009, a major source of HAPs.

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*
The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. Wipe cleaning activities, such as using a rag containing halogenated solvent are not covered under the provisions of this subpart.

The permittee operates metal parts washers that contain a petroleum naphtha solvent (EP-16) handled by Safety-Kleen a non halogenated solvents as defined in 40 CFR 63.460, therefore the solvent cleaning operations are not subject to the MACT standards for halogenated solvent cleaning.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
40 CFR Part 61 Subpart M, *National Emission Standard for Asbestos*, §61.145(a), Standard for demolition and renovation, applies to the installation.

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

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

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

Prepared by:

for Michael Stansfield

Berhanu A. Getahun
Environmental Engineer