

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2018-076
Expiration Date: OCT 01 2023
Installation ID: 183-0184
Project Number: 2016-04-042

Installation Name and Address

True Manufacturing Company
2001 East Terra Lane
O'Fallon, MO 63366
St. Charles County

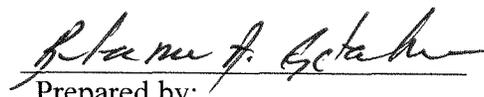
Parent Company's Name and Address

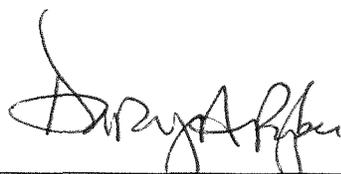
True Manufacturing
2001 East Terra Lane
O'Fallon, MO 63366

Installation Description:

True Manufacturing Company manufactures commercial refrigeration equipment, including display cases, food preparation tables, restaurant refrigerators and freezers in O'Fallon Missouri (St. Charles County). The manufacturing process begins with the assembly of the cases from stainless steel, vinylclad steel, pre-painted coil steel, extruded aluminum, and extruded plastic.

The installation is a synthetic minor source of Volatile Organic Compounds (VOCs), and Hazardous Air Pollutants (HAPs) and a minor source of particulate matter less than ten microns in diameter (PM₁₀), Sulfur Oxides (SO_x), Nitrogen Oxides (NO_x), and Carbon Monoxide (CO).


Prepared by:
Berhanu A. Getahun
Operating Permit Unit



Director or Designee
Department of Natural Resources
OCT 01 2018

Effective Date

Table of Contents

| | |
|---|-----------|
| I. INSTALLATION EQUIPMENT LISTING..... | 4 |
| EMISSION UNITS WITH LIMITATIONS..... | 4 |
| EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS | 4 |
| II. PLANT WIDE EMISSION LIMITATIONS..... | 6 |
| Permit Condition PW001 | 6 |
| 10 CSR 10-6.060, Construction Permits Required | 6 |
| Construction Permit No. 042004-009, Issued March 10, 2004..... | 6 |
| 10 CSR 10-6.065, Operating Permits | 6 |
| 10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s) | 6 |
| Permit Condition PW002 | 7 |
| 10 CSR 10-6.060, Construction Permits Required | 7 |
| Construction Permit No. 042004-009..... | 7 |
| III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS..... | 8 |
| EP-04 AND EP-05 – SURFACE COATING OPERATIONS..... | 8 |
| Permit Condition (EP-04 and EP-05) - 001 | 8 |
| 10 CSR 10-6.070 New Source Performance Regulations..... | 8 |
| 40 CFR Part 60 Subpart SS - Standards of Performance for Industrial Surface Coating: Large Appliances..... | 8 |
| Permit Condition (EP-04 and EP-05) - 002 | 11 |
| 10 CSR 10-5.330 Control of Emissions From Industrial Surface Coating Operations..... | 11 |
| EP-15 – 8,000 GALLON GASOLINE UNDERGROUND STORAGE TANK..... | 14 |
| Permit Condition (EP-15) - 001 | 14 |
| 10 CSR 10-5.220 Control of Petroleum Storage, Loading and Transfer | 14 |
| Permit Condition (EP-15) - 002 | 15 |
| 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations..... | 15 |
| 40 CFR Part 63, Subpart CCCCCC National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities | 15 |
| EP-16 – COLD SOLVENT CLEANING (PARTS WASHERS)..... | 15 |
| Permit Condition (EP-16) - 001 | 15 |
| 10 CSR 10-5.300, Control of Emissions from Solvent Metal Cleaning | 15 |
| EP-19 – COOLER REPAIR PAINTING OPERATIONS | 18 |
| Permit Condition (EP-19) - 001 | 18 |
| 10 CSR 10-6.070 New Source Performance Regulations..... | 18 |
| 40 CFR Part 60 Subpart SS Standards of Performance for Industrial Surface Coating: Large Appliances..... | 18 |
| Permit Condition (EP-19) - 002 | 19 |
| 10 CSR 10-5.330 Control of Emissions From Industrial Surface Coating Operations..... | 19 |
| Permit Condition (EP-19) - -003..... | 22 |
| 10 CSR 10-6.060, Construction Permits Required | 22 |
| Construction Permit No. 042004-009..... | 22 |
| Construction Permit No. 042004-009B | 22 |
| EP-20 AND EP-21 – ELECTROSTATIC POWDER COAT LINE | 24 |
| Permit Condition (EP-20 and EP-21) - 001 | 24 |
| 10 CSR 10-6.070 New Source Performance Regulations..... | 24 |
| 40 CFR Part 60 Subpart SS Standards of Performance for Industrial Surface Coating: Large Appliances..... | 24 |
| Permit Condition (EP-20) - 002 | 27 |
| 10 CSR 10-5.330 Control of Emissions From Industrial Surface Coating Operations..... | 27 |
| EP-27 – EMERGENCY GENERATORS | 30 |
| Permit Condition (EP-27)-001 | 30 |
| 10 CSR 10-6.070 New Source Performance Regulations..... | 30 |
| 40 CFR Part 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines..... | 30 |
| IV. CORE PERMIT REQUIREMENTS..... | 34 |

| | |
|---|-----------|
| V. GENERAL PERMIT REQUIREMENTS | 41 |
| VI. ATTACHMENTS | 45 |
| Attachment A | 46 |
| Plant - Wide Volatile Organic Compounds (VOCs) Emissions Tracking Record..... | 46 |
| Attachment B | 48 |
| Plant - Wide Individual HAP and Combined HAPs Tracking Record | 48 |
| Attachment C | 49 |
| 10 CSR 10-6.220 Compliance Demonstration Method 22 Visible Emissions Observations..... | 49 |
| ATTACHMENT D..... | 50 |
| 10 CSR 10-6.220 Compliance Demonstration Method 9 Opacity Observations | 50 |
| Attachment E..... | 52 |
| 10 CSR 10-5.330, Control of Emissions From Industrial Surface Coating Operations Compliance Demonstration - Sample Record Form..... | 52 |
| Attachment F..... | 53 |
| 10 CSR 10-5.330, Control of Emissions From Industrial Surface Coating Operations - Compliance Demonstration - Sample Record Form..... | 53 |
| Attachment G | 54 |
| Construction Permit No. 042004-009 Solvent Usage Tracking Worksheet..... | 54 |
| Attachment H | 55 |
| 10 CSR 10-5.300 Compliance Demonstration Solvent Containing Waste Transfer Log | 55 |
| Attachment I..... | 56 |
| 10 CSR 10-5.300 Compliance Demonstration Inspection/Maintenance/Repair/Malfunction Log | 56 |
| Attachment J | 57 |
| 10 CSR 10-5.300 Compliance Demonstration Purchase Records for Cold Cleaning Solvent..... | 57 |
| Attachment K | 58 |
| 10 CSR 10-5.300 Compliance Demonstration Employee Solvent Metal Cleaning Training Log | 58 |
| ATTACHMENT L | 59 |
| Inspection/Maintenance/Repair/Malfunction Log | 59 |

I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

| Emission Unit | Description of Emission Unit |
|---------------|---|
| EP-04 | 5 Stage Wire Shelf Washers – Primer Application & Cure Ovens |
| EP-05 | Wire Shelf Vinyl Powder Coating & Cure Ovens |
| EP-15 | 8,000 Gallon Gasoline Underground Storage Tank |
| EP-16 | Cold Solvent Cleaning – Parts Washers |
| EP-19 | Cooler Repair Painting Operations |
| EP-20 | 5 Stage Steel Pretreatment Washer/Prime Deep Coat & Cure Oven |
| EP-21 | Steel Electrostatic Powder Coating & Dry-off Oven |
| EP-27 | Emergency Generators |

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

| Emission Unit | Description of Emission Unit |
|---------------|--|
| EP-03 | Metal Rack Forming |
| EP-07 | Welding & Brazing Operations |
| EP-09 | Cooler Cleaning/Wipedown |
| EP-10 | Spray Adhesive Operations (Aerosol Cans) |
| EP-11 | Urethane Foam Operation |
| EP-12 | Wood Cutting/Pallet |
| EP-13 | Natural Gas-fired Space Heaters <ul style="list-style-type: none"> • Building 2/5: 33 Heaters, 29.2796 MMBtu/hr • Building 3/4: 10 Heaters, 17.937 MMBtu/hr • Building 6/7/8/9: 17 Heaters, 20.15 MMBTU • Building T-10: 53 Heaters, 29.008 MMBtu/hr • Warehouse T-11: 6 Heaters, 1.737 MMBtu/hr • Warehouse T-12 (70W1, 70WII): 4 Heaters; 5.6 MMBtu/hr • Warehouse T-15: 4 Heaters, 17.6 MMBtu/hr • Warehouse T-19: 17 Heaters, 6.6 MMBtu/hr |
| EP-14 | 8,000 Gallon Capacity Diesel Oil #2 Underground Fixed Roof Storage Tank |
| EP-18 | Maintenance Garage Operations |
| EP-22 | Laser Cutters |
| EP-23 | Pretreatment System Combustion Unit (7.5 MMBtu/hr) and Pre Powder Coat Dry Off Oven – Natural Gas-fired (3 MMBtu/hr) |
| EP-24 | Electrostatic Powder Coat Curing Oven - Natural Gas-fired (8 MMBtu/hr) |
| EP-25 | Copper Component Washers - Natural Gas-fired Heaters (1.4 MMBtu/hr) |
| EP-26 | Soldering Oven - Natural Gas-fired (2 MMBtu/hr) |

| Emission Unit | Description of Emission Unit |
|---------------|------------------------------|
|---------------|------------------------------|

Six (6) Portable Emergency Generators:

140 Kilowatt (kW) Baldaor Emergency Generator

33 kW Kohler Emergency Generator

4 kW Dayton Emergency Generator

2.4 kW Honda Emergency Generator

6.5 kW Briggs & Stratton Emergency Generator

4 kW Briggs & Stratton Emergency Generator

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

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) The permittee 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) The permittee 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) The permittee 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:

The permittee shall use Attachment A and Attachment B or equivalent forms approved by the Air Pollution Control Program 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). The permittee 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 the commercial refrigeration manufacturing equipment. [Construction Permit 042004-009: Special Condition 1.D.]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, or AirComplianceReporting@dnr.mo.gov, 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 1.E.]
- 2) Reports of any deviations from monitoring, record keeping 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.

Permit Condition PW002

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

Operational Limitation:

The permittee shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. The permittee 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 3.]

Requirements for Future Emission Alterations for VOCs

If a situation arises such that the permittee 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 4.]

Requirements for Future Emission Alterations for HAPs

If a situation arises such that the permittee 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 5.]

III. Emission Unit Specific Emission Limitations

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

| EP-04 and EP-05 – Surface Coating Operations | | |
|--|---|-------------------------|
| Emission Unit | Description | Manufacturer/Model # |
| EP-04 | 5-Stage Wire Shelf Washer/Primer (2) & Cure Ovens | Millbank/199 & GAF/2000 |
| EP-05 | Wire Shelf Powder Coating (2) & Cure Ovens | Millbank/1993 & 1999 |

Permit Condition (EP-04 and EP-05) - 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 (VOCs).

The permittee shall not 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 (EP-04 and EP-05) 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 permittee shall conduct a performance test each calendar month for each affected facility according to the procedures in this paragraph. [§60.453(b)]
 - a) The permittee 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 Director may require the permittee to determine the VOC content of coatings using Method 24 if the permittee uses formulation data supplied by the coating manufacturer to determine the composition of the coatings. The permittee 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 permittee 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 Director. [§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)]

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

($\sum L_{dj} D_{dj}$ 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)]

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

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 permittee can demonstrate to the satisfaction of the Director that transfer efficiencies other than those shown are appropriate, the Director will approve their use on a case-by-case basis. Transfer efficiencies for application methods not listed shall be determined by the Director on a case-by-case basis. The permittee must submit sufficient data for the Director 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 permittee shall determine the composition and volume of each coating applied by each method through a means acceptable to the Director and compute the weighted average transfer efficiency by the following equation:

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

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)]

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

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)]

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

- 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) The permittee shall identify, record, and submit a written report to the Director 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 Director semiannually. [§60.455(b)]
- 2) The permittee 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 (EP-04 and EP-05) - 002

10 CSR 10-5.330

Control of Emissions From Industrial Surface Coating Operations

Emission Limitation:

The permittee shall not cause, allow or permit the discharge into the ambient air of any VOCs in excess of the following, as delivered to the coating applicator(s): [10 CSR 10-5.330(3)(A)2.B.]

| Large Appliance Coatings | | |
|--------------------------|---|-----------|
| Coating Category | Emission Limit pounds of VOC per gallon of coating (minus water and exempt compounds) | |
| | Baked | Air Dried |
| General, One Component | 2.3 | 2.3 |
| General, Multi Component | 2.3 | 2.8 |
| Extreme High Gloss | 3.0 | 2.8 |
| Extreme Performance | 3.0 | 3.5 |
| Heat Resistant | 3.0 | 3.5 |
| Metallic | 3.5 | 3.5 |
| Pretreatment Coatings | 3.5 | 3.5 |
| Solar Absorbent | 3.0 | 3.5 |
| Repair and Touch Up | 6.5 | 6.5 |

Monitoring:

The permittee shall use one of the following methods to determine compliance with the VOC emission limitation:

- 1) *Compliant Coatings:* -Application of compliant coatings with records sufficient to demonstrate that the VOC content of each coating applied is less than the VOC emission limits listed in the emission limit table. Or

- 2) *VOC Content of Coatings* - Determine the daily volume-weighted average VOC content of all coatings used in EP-04 and EP-05, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds), per 10 CSR 10-5.330(5)(C)3.A. The surface coating operation is in compliance if this value is less than or equal to the emission limits.
- a) The permittee shall determine the daily volume-weighted average (DAVG_{VW}) VOC content of all coatings used as delivered to the coating applicator(s) using the following formula found at 10 CSR 10-5.330(5)(C)3.A., only if any non-compliant coating(s) is applied:

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

Where:

- DAVG_{VW} = daily volume-weighted average VOC content, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds);
A = daily gallons of each coating used (minus water and exempt solvents), in a surface coating unit;
B = VOC content of the coatings as applied, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds);
C = total daily gallons of coatings used (minus water and exempt compounds), in a surface coating unit; and
n = number of all coatings used in a surface coating unit.

- b) VOC content of the coating as applied (B), expressed as pounds of VOC per gallon of coating (minus water and exempt compounds). This is determined using the following equation per Subparagraph (5)(C)1.A. of 10 CSR 10-5.330.

$$B = \frac{D_C \times W_O}{1 - \left(\frac{D_C \times W_W}{8.33} \right) - \left(\sum_{j=1}^m \frac{D_C \times W_{Ej}}{D_{Ej}} \right)}$$

Where:

- D_C = density of coating as applied, expressed as pounds per gallon;
W_O = weight fraction of regulated VOC in the coating, as applied. This value does not include the weight fraction of water or exempt compounds;
W_W = weight fraction of water in the coating, as applied;
W_E = weight fraction of exempt compounds in the coating, as applied;
D_E = density of each exempt compound, expressed as pounds per gallon;
m = number of exempt compounds in the coating; and
8.33 = density of water, expressed as pounds per gallon.

Equipment Specification:

Application Equipment – the permittee shall use one (1) or a combination of the following equipment for coating application, unless achieving compliance by using an add-on control device per Subparagraph (3)(A)3.C. of 10 CSR 10-5.330:

- 1) Electrostatic spray;
- 2) High-volume low-pressure (HVLP) spray;

- 3) Flow coat;
- 4) Roller coat or hand application, including non-spray application methods similar to hand or mechanically-powered caulking gun, brush, or direct hand application;
- 5) Dip coat, including electrodeposition;
- 6) Airless spray;
- 7) Air-assisted airless spray;
- 8) Ink jet technology; and
- 9) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.

Work Practices.

The permittee shall use work practices to minimize VOC emissions from solvent storage, mixing operations, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- 1) Store all VOC-containing coatings, thinners, and cleaning materials in closed containers;
- 2) Ensure that mixing and storage containers used for VOC-containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials;
- 3) Minimize spills of VOC-containing coatings, thinners, and cleaning materials;
- 4) Clean up spills immediately;
- 5) Convey any coatings, thinners, and cleaning materials in closed containers or pipes from one (1) location to another; and
- 6) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Recordkeeping:

- 1) The permittee shall maintain a record of the VOC content, in pounds per gallon (Material Safety Data Sheets, etc.), of all coatings used in this surface coating operation if the permittee uses compliance coatings as required by Monitoring 1 of this permit condition to meet the applicable emission limitations:
- 2) The permittee shall maintain the following records if the permittee uses daily volume-weighted average as required by Monitoring 2 of this permit condition to comply with the applicable emission limitation:
 - a) The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance (see Attachments E and F). 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 Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, 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. Any deviations from this permit condition shall also be reported in the annual compliance certification, as required by Section V of this permit.

| EP-15 – 8,000 Gallon Gasoline Underground Storage Tank | |
|---|--|
| Emission Unit | Description |
| EP-15 | 8,000 Gallon Gasoline Underground Storage Tank |

| Permit Condition (EP-15) - 001 |
|---|
| 10 CSR 10-5.220 Control of Petroleum Storage, Loading and Transfer |

Operational Limitation/Equipment Specifications:

The permittee shall not 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 permittee 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 permittee 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:

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Missouri Department of Natural Resources Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as required by Section V of this permit..

Permit Condition (EP-15) - 002

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart CCCCCC National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

Operational Limitation/Equipment Specifications:

40 CFR §63.11116 Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline.

- 1) The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [40 CFR §63.11116(a)]
 - a) Minimize gasoline spills; [40 CFR §63.11116(a)(1)]
 - b) Clean up spills as expeditiously as practicable; [40 CFR §63.11116(a)(2)]
 - c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [40 CFR §63.11116(a)(3)]
 - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [40 CFR §63.11116(a)(4)]
- 2) The permittee is not required to submit notifications or reports as specified in 40 CFR §63.11125, §63.11126, or Subpart A of 40 CFR Part 63, but the permittee must have records available within 24 hours of a request by the Administrator to document the permittee's gasoline throughput. [40 CFR §63.11116(b)]
- 3) Portable gasoline containers that meet the requirements of 40 CFR Part 59, Subpart F, *Control of Evaporative Emissions From New and In-Use Portable Fuel Containers*, are considered acceptable for compliance with 40 CFR §63.11116(a)(3). [40 CFR §63.11116(d)]

EP-16 – Cold Solvent Cleaning (Parts Washers)

| Emission Unit | Description | Manufacturer/ Model # |
|---------------|---------------------------------------|-----------------------|
| EP-16 | Cold Solvent Cleaning (Parts Washers) | Safety-Kleen |

Permit Condition (EP-16) - 001

10 CSR 10-5.300, Control of Emissions from Solvent Metal 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)) unless used for carburetor cleaning. [10 CSR 10-5.300(3)(A)1.A]
- 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 of subparagraph (3)(A)1.A

and (3)(A)1.B of 10 CSR 10-5.300. The director and the U.S Environmental Protection Agency (EPA) must approve the alternative method. [10 CSR 10-5.300(3)(A)1.D]

Operational Limitation/Equipment Specification:

The permittee shall comply with the following operational limitations and equipment specifications unless an exemption under 10 CSR 10-5.300(1)(D) applies:

- 1) Equipment specifications [10 CSR 10-5.300(3)(A)1]:
 - a) Each cold cleaner shall have a cover, which shall prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir, which shall limit the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. [10 CSR 10-5.300(3)(A)1.C]
 - b) Exemptions under (1)(D) of the regulation may apply.
 - c) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) above and is approved by the Director and the EPA. [10 CSR 10-5.300(3)(A)1.D]
 - d) When one (1) 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 (10) square feet, this shall be accomplished by either mechanical assistance or by a power system). [10 CSR 10-5.300(3)(A)1.E]
 - i) The solvent vapor pressure is greater than 0.3 psi measured at one hundred degrees Fahrenheit (100°F). [10 CSR 10-5.300(3)(A)1.E(I)]
 - ii) The solvent is agitated. [10 CSR 10-5.300(3)(A)1.E(II)]
 - iii) The solvent is heated. [10 CSR 10-5.300(3)(A)1.E(III)]
 - e) Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining. [10 CSR 10-5.300(A)1.F]
 - f) If an internal drainage facility as in 10 CSR 10-5.300(3)(A)1.F cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath. [10 CSR 10-5.300(3)(A)1.G]
 - g) Solvent sprays 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. [10 CSR 10-5.300(3)(A)1.H]
 - h) 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. [10 CSR 10-5.300(3)(A)1.I]
 - i) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must use one (1) of the following control devices: [10 CSR 10-5.300(3)(A)1.J]
 - i) A freeboard ratio of at least 0.75; [10 CSR 10-5.300(3)(A)1.J(I)]
 - ii) Water cover (solvent must be insoluble in and heavier than water); or [10 CSR 10-5.300(3)(A)1.J(II)]
 - iii) Other control system that has a mass balance demonstrated overall VOC emission reduction efficiency of at least sixty-five percent (65%) and is approved by the Director and EPA prior to use. [10 CSR 10-5.300(3)(A)1.J(III)]
- 2) Operating procedures: [10 CSR 10-5.300(3)(B)1]

- a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples. [10 CSR 10-5.300(3)(B)1.A].
- b) Cleaned parts shall be drained in the free board area for at least fifteen (15) seconds, or until dripping stops, whichever is longer. [10 CSR 10-5.300(3)(B)1.B]
- c) Whenever a cold cleaner fails to perform within the operating parameters established by 10 CSR 10-5.300, the unit shall be shut down and shall remain shut down until operation is restored to meet 10 CSR 10-5.300's operating requirements. [10 CSR 10-5.300(3)(B)1.C]
- d) Solvent leaks shall be repaired immediately, or the cold cleaner shall be shut down until the leaks are repaired. [10 CSR 10-5.300(3)(B)1.D]
- e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in 10 CSR 10-5.300 or equivalent method approved by the director and EPA. [10 CSR 10-5.300(3)(B)1.E]
- f) Waste solvent shall be stored in closed containers only. [10 CSR 10-5.300(3)(B)1.F]
- 3) Operator and Supervisor Training: [10 CSR 10-5.300(3)(C)]
 - a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in 10 CSR 10-5.300 for the permittee's particular solvent metal cleaning process. [10 CSR 10-5.300(3)(C)1]
 - b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator. [10 CSR 10-5.300(3)(C)2]
 - c) Persons who operate a cold cleaner shall receive a procedural review at least once each twelve (12) months. [10 CSR 10-5.300(3)(C)3]

Monitoring/Recordkeeping:

- 1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment J): [10 CSR 10-5.300(4)(B)]
 - a) Name and address of the solvent supplier. [10 CSR 10-5.300(4)(B)1]
 - b) Date of purchase. [10 CSR 10-5.300(4)(B)2]
 - c) Type of solvent purchased. [10 CSR 10-5.300(4)(B)3]
 - d) Vapor pressure of solvent in mm Hg at 20°C or 68°F. [10 CSR 10-5.300(4)(B)4]
- 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 H). The record also shall include maintenance and repair logs that occurred on the degreaser and any associated control equipment (Attachments I). 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 10 CSR 10-5.300. [10 CSR 10-5.300(4)(A)]
- 3) The permittee shall keep records of solvent metal cleaning training as required by 10 CSR 10-5.300(3)(C) (Attachment K) [10 CSR 10-5.300(4)(D)].
- 4) All records shall be retained for five years and be available to the director upon request. [10 CSR 10-5.300(4)(E)]

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Missouri Department of Natural Resources Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as required by Section V of this permit.

| EP-19 – Cooler Repair Painting Operations | |
|--|--|
| Emission Unit | Description |
| EP-19 | Cooler Repair Painting Operations with Carbon Absorption Filters and Air Filters |

| Permit Condition (EP-19) - 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.

The permittee shall not discharge or cause the discharge of VOC emissions that exceed 0.90 kilogram of VOC's per liter of applied coating solids from the cooler repair painting 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 permittee shall conduct performance test each calendar month for each affected facility according to the procedures in this paragraph. [§60.453(b)]
 - a) The permittee 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 (EP-04 and EP-05) - 001. [§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)]

$$M_r = L_r D_r \tag{10}$$

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)]

$$R = \frac{M_r}{M_o + M_d} \tag{11}$$

- 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)]

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

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 permittee shall identify, record, and submit a written report to the Director 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 Director semiannually. [§60.455(b)]
- 2) The permittee 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 permittee 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 (EP-19) - 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. [10 CSR 10-5.330(3)(A)2.B.]

Monitoring:

The permittee shall use one of the following methods to determine compliance with the VOC emission limitation of 6.5 lbs. VOC/gallon (minus water and non-VOC organic compounds):

- 1) *Compliant Coatings:* 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);
- 2) *VOC Content of Coatings:* - Determine the daily volume-weighted average VOC content of all coatings used in the cooler repair painting operations, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds), per 10 CSR 10-5.330(5)(C)3.A. The surface coating operation is in compliance if this value is less than or equal to the emission limits.

- a) The permittee shall determine the daily volume-weighted average (DAVG_{VW}) VOC content of all coatings used as delivered to the coating applicator(s) using the following formula found at 10 CSR 10-5.330(5)(C)3.A., only if any non-compliant coating(s) is applied:

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

Where:

- DAVG_{VW} = daily volume-weighted average VOC content, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds);
A = daily gallons of each coating used (minus water and exempt solvents), in a surface coating unit;
B = VOC content of the coatings as applied, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds);
C = total daily gallons of coatings used (minus water and exempt compounds), in a surface coating unit; and
n = number of all coatings used in a surface coating unit.

- b) VOC content of the coating as applied (B), expressed as pounds of VOC per gallon of coating (minus water and exempt compounds). This is determined using the following equation per Subparagraph (5)(C)1.A. of 10 CSR 10-5.330.

$$B = \frac{D_c \times W_o}{1 - \left(\frac{D_c \times W_w}{8.33} \right) - \left(\sum_{j=1}^m \frac{D_c \times W_{Ej}}{D_{Ej}} \right)}$$

Where:

- D_C = density of coating as applied, expressed as pounds per gallon;
W_O = weight fraction of regulated VOC in the coating, as applied. This value does not include the weight fraction of water or exempt compounds;
W_W = weight fraction of water in the coating, as applied;
W_E = weight fraction of exempt compounds in the coating, as applied;
D_E = density of each exempt compound, expressed as pounds per gallon;
m = number of exempt compounds in the coating; and
8.33 = density of water, expressed as pounds per gallon.

- 3) *Combination of VOC content of coatings and add-on controls*: - Calculate the required control system efficiency per paragraph (5)(C)4. of this rule. The surface coating unit is in compliance if the actual overall control system efficiency is greater than or equal to the required control system efficiency; or

Equipment Specification:

Application Equipment - One (1) or a combination of the following equipment shall be used for coating application, unless achieving compliance by using an add-on control device per Subparagraph (3)(A)3.C. of 10 CSR 10-5.330:

- 1) Electrostatic spray;
- 2) High-volume low-pressure (HVLP) spray;

- 3) Flow coat;
- 4) Roller coat or hand application, including non-spray application methods similar to hand or mechanically-powered caulking gun, brush, or direct hand application;
- 5) Dip coat, including electrodeposition;
- 6) Airless spray;
- 7) Air-assisted airless spray;
- 8) Ink jet technology; and
- 9) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.

Work Practices.

Work practices shall be used to minimize VOC emissions from solvent storage, mixing operations, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- 1) Store all VOC-containing coatings, thinners, and cleaning materials in closed containers;
- 2) Ensure that mixing and storage containers used for VOC-containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials;
- 3) Minimize spills of VOC-containing coatings, thinners, and cleaning materials;
- 4) Clean up spills immediately;
- 5) Convey any coatings, thinners, and cleaning materials in closed containers or pipes from one (1) location to another; and
- 6) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

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 pounds 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 permittee shall keep records detailing specific VOC sources, as necessary to determine compliance (see Attachments E and F). 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 Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, 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. Any deviations from this permit condition shall also be reported in the annual compliance certification, as required by Section V of this permit.

Permit Condition (EP-19) - -003

10 CSR 10-6.060, Construction Permits Required
Construction Permit No. 042004-009
Construction Permit No. 042004-009B

Operational Limitation/Equipment Specifications:

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

- 1) The permittee shall control Particulate Matter less than ten microns in diameter (PM₁₀) from the Cooler Repair Painting Operations (EP-19) using air filters. 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 (0.1 to 1.0 inches of water), whenever the emission unit(s) is in operation.
[Construction Permit 042004-009B: Special Condition Number 2.A1.]
 - 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) The permittee 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) The permittee shall control VOCs from the paint booth (EP-19) using carbon absorption filters. The carbon absorption filters 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) The permittee shall replace the carbon absorption filters 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) The permittee shall use Attachment G or equivalent forms to demonstrate compliance with Special Condition 2(C). The permittee 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) The permittee shall maintain an operating and maintenance log for the carbon absorption filters 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.]

| EP-20 and EP-21 – Electrostatic Powder Coat Line | | |
|---|--|--------------------------------|
| Emission Unit | Description | Manufacturer/ Model # |
| EP-20 | 5-Stage Steel Pretreatment Washer/Prime Dip Coat with 2.7 MMBtu Natural Gas-fired Heaters & 1.5 MMBtu Natural Gas-fired Dry-off Oven | KMI Systems |
| EP-21 | Steel Electrostatic Powder Coating with Natural Gas-fired 2.5 MMBtu Cure Oven | Nordson/KMI Model: Exceel-2001 |

| Permit Condition (EP-20 and EP-21) - 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.

The permittee shall not 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 (EP-20 and EP-21) 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 permittee shall conduct a performance test each calendar month for each affected facility according to the procedures in this paragraph. [§60.453(b)]
 - a) The permittee 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 Director may require the permittee to determine the VOC content of coatings using Method 24 if the permittee uses formulation data supplied by the coating manufacturer to determine the composition of the coatings. The permittee 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 permittee 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 Director. [§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)]

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

$(\sum L_{dj}D_{dj})$ 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)]

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

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 permittee can demonstrate to the satisfaction of the Director that transfer efficiencies other than those shown are appropriate, the Director will approve their use on a case-by-case basis. Transfer efficiencies for application methods not listed shall be determined by the Director on a case-by-case basis. The permittee must submit sufficient data for the Director 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 permittee shall determine the composition and volume of each coating applied by each method through a means acceptable to the Director and compute the weighted average transfer efficiency by the following equation:

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

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)]

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

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)]

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

- 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) The permittee shall identify, record, and submit a written report to the Director 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 Director semiannually. [§60.455(b)]
- 2) The permittee 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 (EP-20) - 002

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

Emission Limitation:

The permittee shall not cause, allow or permit the discharge into the ambient air of any VOCs in excess of the following, as delivered to the coating applicator(s): [10 CSR 10-5.330(3)(A)2.B.]

| Large Appliance Coatings | | |
|--------------------------|---|-----------|
| Coating Category | Emission Limit pounds of VOC per gallon of coating (minus water and exempt compounds) | |
| | Baked | Air Dried |
| General, One Component | 2.3 | 2.3 |
| General, Multi Component | 2.3 | 2.8 |
| Extreme High Gloss | 3.0 | 2.8 |
| Extreme Performance | 3.0 | 3.5 |
| Heat Resistant | 3.0 | 3.5 |
| Metallic | 3.5 | 3.5 |
| Pretreatment Coatings | 3.5 | 3.5 |
| Solar Absorbent | 3.0 | 3.5 |
| Repair and Touch Up | 6.5 | 6.5 |

Monitoring:

The permittee shall use one of the following methods to determine compliance with the VOC emission limitation:

- 1) *Compliant Coatings:* -Application of compliant coatings with records sufficient to demonstrate that the VOC content of each coating applied is less than the VOC emission limits listed in the emission limit table. Or

- 2) *VOC Content of Coatings* - Determine the daily volume-weighted average VOC content of all coatings used in EP-20 and EP-21, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds), per 10 CSR 10-5.330(5)(C)3.A. The surface coating operation is in compliance if this value is less than or equal to the emission limits.
- a) The permittee shall determine the daily volume-weighted average ($DAVG_{VW}$) VOC content of all coatings used as delivered to the coating applicator(s) using the following formula found at 10 CSR 10-5.330(5)(C)3.A., only if any non-compliant coating(s) is applied:

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

Where:

- $DAVG_{VW}$ = daily volume-weighted average VOC content, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds);
A = daily gallons of each coating used (minus water and exempt solvents), in a surface coating unit;
B = VOC content of the coatings as applied, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds);
C = total daily gallons of coatings used (minus water and exempt compounds), in a surface coating unit; and
n = number of all coatings used in a surface coating unit.

- b) VOC content of the coating as applied (B), expressed as pounds of VOC per gallon of coating (minus water and exempt compounds). This is determined using the following equation per Subparagraph (5)(C)1.A. of 10 CSR 10-5.330.

$$B = \frac{D_c \times W_o}{1 - \left(\frac{D_c \times W_w}{8.33} \right) - \left(\sum_{j=1}^m \frac{D_c \times W_{Ej}}{D_{Ej}} \right)}$$

Where:

- D_c = density of coating as applied, expressed as pounds per gallon;
 W_o = weight fraction of regulated VOC in the coating, as applied. This value does not include the weight fraction of water or exempt compounds;
 W_w = weight fraction of water in the coating, as applied;
 W_E = weight fraction of exempt compounds in the coating, as applied;
 D_E = density of each exempt compound, expressed as pounds per gallon;
m = number of exempt compounds in the coating; and
8.33 = density of water, expressed as pounds per gallon.

Equipment Specification:

Application Equipment – The permittee shall use one (1) or a combination of the following equipment for coating application, unless achieving compliance by using an add-on control device per Subparagraph (3)(A)3.C. of 10 CSR 10-5.330:

- 1) Electrostatic spray;
- 2) High-volume low-pressure (HVLP) spray;

- 3) Flow coat;
- 4) Roller coat or hand application, including non-spray application methods similar to hand or mechanically-powered caulking gun, brush, or direct hand application;
- 5) Dip coat, including electrodeposition;
- 6) Airless spray;
- 7) Air-assisted airless spray;
- 8) Ink jet technology; and
- 9) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.

Work Practices.

The permittee shall use work practices to minimize VOC emissions from solvent storage, mixing operations, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- 1) Store all VOC-containing coatings, thinners, and cleaning materials in closed containers;
- 2) Ensure that mixing and storage containers used for VOC-containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials;
- 3) Minimize spills of VOC-containing coatings, thinners, and cleaning materials;
- 4) Clean up spills immediately;
- 5) Convey any coatings, thinners, and cleaning materials in closed containers or pipes from one (1) location to another; and
- 6) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

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 pounds 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 permittee shall keep records detailing specific VOC sources, as necessary to determine compliance (see Attachments E and F). 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 Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, 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. Any deviations from this permit condition shall also be reported in the annual compliance certification, as required by Section V of this permit.

| EP-27 – Emergency Generators | |
|-------------------------------------|---|
| Emission Unit | Description |
| EP-27 | T10 - 200 kW Emergency Diesel Generator - Stationary Compression Ignition Internal Combustion Engine (CI ICE), 320 HP, 6 cylinder engine, with a displacement of 1.45 liters per cylinder. Generac: Model # SD0200KG178.7D18HPY3, Serial # 9411748 (Manufactured – December 19, 2014) |
| | T10 - 200 kW Emergency Diesel Generator - Stationary Compression Ignition Internal Combustion Engine (CI ICE), 320 HP, 6 cylinder engine, with a displacement of 1.45 liters per cylinder. Generac: Model # SD0200KG178.7D18HPY3, Serial # 9411747 (Manufactured – December 19, 2014) |
| | Bldg #5 - 80 kW Emergency Diesel Generator - CI ICE, 131 HP, 4 cylinder engine, with a displacement of 1.125 liters per cylinder. Generac: Model # SD0080KG174, Serial # 9615092 (Manufactured – March 25, 2015) |
| | Bldg #4 - 180 kW Emergency Diesel Generator - CI ICE, 235 HP, 6 cylinder engine, with a displacement of 1.133 liters per cylinder. Kohler: Model # 180REOZJF, Serial # SGM328G9Z (Manufactured – November 8, 2013) |
| | Bldg #7/9 - 400 kW Emergency Diesel Generator - CI ICE, 578 HP, 6 cylinder engine, with a displacement of 2.08 liters per cylinder. Generac: Model # SD0400KG22125D18HPYY3, Serial # 9264946 (Manufactured – December 5, 2014) |

| Permit Condition (EP-27)-001 |
|---|
| 10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines |

Emission Limitation/Standards:

- 1) *2007 model year and later emergency CI ICE - with a displacement of less than 30 liters per cylinder that are not fire pump engines:*
 - a) The Permittee must comply with the emission standards for new nonroad CI engines in §60.4202, for all pollutants, for the same model year and maximum engine power for 2007 model year and later emergency stationary CI ICE. [§60.4205(b)]
 - b) For engines with a maximum engine power greater than or equal to 37 kilowatt (KW) (50 horsepower (HP)), the certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 for all pollutants beginning in model year 2007. [§60.4202(a)(2)]

- i) Exhaust emissions from T10 - two 200 kW Emergency Generators and Bldg #4 - 180 kW Emergency Generator shall not exceed the following: [Table 1 §89.112]
 - 14.0 g/KW-hr NMHC and NO_x;
 - 3.5 g/KW-hr of CO; and
 - 0.20 g/KW-hr of PM.
 - ii) Exhaust emissions from Bldg #5 - 80 kW Emergency Generator shall not exceed the following: [Table 1 §89.112]:
 - 4.0 g/KW-hr of non-methane hydrocarbon (NMHC) and oxides of nitrogen (NO_x);
 - 5.0 g/KW-hr of CO; and
 - 0.30 g/KW-hr of PM.
 - iii) Exhaust emissions from Bldg #7/9 - 400 KW Emergency Generator shall not exceed the following: [Table 1 §89.112]:
 - 4.0 g/KW-hr NMHC and NO_x;
 - 3.5 g/KW-hr of CO; and
 - 0.20 g/KW-hr of PM.
- 2) Smoke Emission Standard [§60.4202(a)(2) and 40 CFR 89.113]
 - a) Exhaust opacity from compression-ignition nonroad engines for which this subpart is applicable must not exceed:
 - i) 20 percent during the acceleration mode;
 - ii) 15 percent during the lugging mode; and
 - iii) 50 percent during the peaks in either the acceleration or lugging modes.
 - b) Opacity levels are to be measured and calculated as set forth in 40 CFR part 86, subpart I.
 - 3) The General Provisions of 40 CFR 60.1 through 19 apply as indicated in Table 8 of 40 CFR 60, Subpart IIII except that the permittee is not required to submit initial notification. [§60.4218 & §60.4214(b)]
 - 4) The permittee must operate and maintain the emergency stationary CI ICE that achieve the emission standards as required in §60.4205(b) over the entire life of the engines. [§60.4206]

Operational Limitation:

The permittee must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted: [§60.4207(b)]

- 1) Sulfur content. 15 parts per million (ppm) maximum. [§80.510(b)(1)(i)]
- 2) Cetane index or aromatic content, as follows: [§80.510(b)(2)]
 - a) A minimum cetane index of 40; or [§80.510(b)(2)(i)]
 - b) A maximum aromatic content of 35 volume percent. [§80.510(b)(2)(ii)]

Monitoring/Compliance Requirements:

- 1) Prior to the startup of each engine, the permittee must install a non-resettable hour meter on each engine that does not meet the applicable emission standards for non-emergency engines. [§60.4209(a)]
- 2) The permittee must do all of the following, except as permitted under §60.4211(g): [§60.4211(a)]
 - a) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [§60.4211(a)(1)]
 - b) Change only those emission-related settings that are permitted by the manufacturer; and [§60.4211(a)(2)]
 - c) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to the you. [§60.4211(a)(3)]

- 3) The permittee must comply with the emission standards specified in §60.4205(b), the permittee must comply by purchasing an engine certified to the emission standards in §60.4205(b) and (c), for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in §60.4211(g). [§60.4211(c)]
- 4) The permittee must operate the emergency stationary ICE according to the requirements in §60.4211(f)(1), (f)(2)(i) and (f)(3). In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §60.4211(f)(1), (f)(2)(i) and (f)(3), is prohibited. If the permittee does not operate the engine according to the requirements in §60.4211(f)(1), (f)(2)(i) and (f)(3), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [§60.4211(f)]
 - a) There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4211(f)(1)]
 - b) The permittee may operate the emergency stationary ICE for any combination of the purposes specified in paragraphs §60.4211 (f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph §60.4211 (f)(2)(i). [§60.4211(f)(2)]
 - i) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [§60.4211(f)(2)(i)]
 - c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §60.4211(f)(2). Except as provided in §60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§60.4211(f)(3)]
 - i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§60.4211(f)(3)(i)]
 - (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator; [§60.4211(f)(3)(i)(A)]
 - (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§60.4211(f)(3)(i)(B)]
 - (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§60.4211(f)(3)(i)(C)]

- (D) The power is provided only to the facility itself or to support the local transmission and distribution system. [§60.4211(f)(3)(i)(D)]
- (E) The permittee identifies and records the entity that dispatches the engine and the specific North American Electric Reliability Corporation (NERC), regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§60.4211(f)(3)(i)(E)]

Record Keeping/Reporting:

Notification, Reports, and Records: [§60.4214]

According to §60.4214(b), the permittee is not required to submit an initial notification.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

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

10 CSR 10-6.100 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 10-6.110 Reporting of Emission Data, Emission Fees and Process Information

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

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

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

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

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.

- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

Emission Limitation:

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]
- 2) Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 40 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]
- 3) Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

Monitoring:

- 1) Monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
 - i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
 - ii) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
- 2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
- 3) Observations are only required when the emission units are operating and when the weather conditions allow.
- 4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
- 5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
- 6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

Record Keeping:

- 1) The permittee shall maintain records of all observation results for each emission unit using Attachments C and D or equivalent forms.
- 2) The permittee shall make these records available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3) The permittee shall retain all records for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after an exceedance of the emission limitation.
- 2) The permittee shall report any deviations from the requirements of this permit condition using in the annual monitoring report and annual compliance certification as required by Section V of this permit.

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

This is a State Only permit requirement.

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

10 CSR 10-6.280 Compliance Monitoring Usage

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

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

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities 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, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. 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 (Rescinded on February 11, 1979, 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.

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(C)1, §(6)(C)1.B, §(5)(E)2.C 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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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

1) Record Keeping

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

2) Reporting

- a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
- b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
- d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

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

None.

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

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

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

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

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

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

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

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

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

The application utilized in the preparation of this permit was signed by Steven Trulaske, Owner. 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 (MoDNR) 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) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.

Attachment A (continued) Plant - Wide Volatile Organic Compounds (VOCs) Emissions Tracking Record

Attachment A Notes:

1. List all materials containing VOC used by EU0003 Painting, Paint Cleanup and Degreasing Operation.
2. As listed on the SDS for the material. If the specific gravity (s.g.) is provided instead, Density (lb/gal) = s.g. x 8.33.
3. As listed on the SDS for the material. If a range of values is provided, use the highest value in the range to demonstrate compliance.
4. Monthly VOC Emissions (tons) = Monthly Usage (gallons) x Density (lb/gal) x VOC Content (wt %) x 0.0005 (ton/lb).
5. VOC Emission Factor obtained from AP-42 §§1.4 and 3.2.
6. VOC Emission Factor obtained from AP-42 §§1.3, 3.3 and WebFire.
7. Monthly VOC Emissions (tons) = Monthly Usage x VOC Emission Factor (lb/unit) x 0.0005 (ton/lb)
8. Plantwide Monthly VOC Emissions (tons) = The sum of all Monthly VOC Emissions (tons) from each material used by EU0003 Painting, Paint Cleanup and Degreasing Operation + Monthly VOC Emissions from all combustion equipment.
9. Plantwide 12-Month Rolling Total VOC Emissions (tons) = The sum of the 12 most recent Plantwide Monthly VOC Emissions (tons) + the sum of all start-up, shutdown, and malfunction VOC emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section during the most recent 12 month period. **Plantwide 12-Month Rolling Total VOC Emissions of less than or equal to 99 tons per year indicates compliance with Permit Condition PW002.**

Attachment C

10 CSR 10-6.220 Compliance Demonstration
 Method 22 Visible Emissions Observations

| Method 22 Visible Emissions Observations | | | | | |
|---|-------------------------------------|----|----------------|----|----------|
| Installation Name | | | Observer Name | | |
| Location | | | Date | | |
| Sky Conditions | | | Wind Direction | | |
| Precipitation | | | Wind Speed | | |
| Time | | | Emission unit | | |
| Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points. | | | | | |
| Minute | Seconds | | | | Comments |
| | 0 | 15 | 30 | 45 | |
| | Visible Emissions Yes (Y) or No (N) | | | | |
| 0 | | | | | |
| 1 | | | | | |
| 2 | | | | | |
| 3 | | | | | |
| 4 | | | | | |
| 5 | | | | | |
| 6 | | | | | |

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.

Attachment D

10 CSR 10-6.220 Compliance Demonstration
 Method 9 Opacity Observations

| Method 9 Opacity Observations | | |
|---|---|---------------------|
| Installation Name: | Sketch of the observer's position relative to the emission unit | |
| Emission Point: | | |
| Emission Unit: | | |
| Observer Name and Affiliation: | | |
| Observer Certification Date: | | |
| Method 9 Observation Date: | | |
| Height of Emission Point: | | |
| Time: | Start of observations | End of observations |
| Distance of Observer from Emission Point: | | |
| Observer Direction from Emission Point: | | |
| Approximate Wind Direction: | | |
| Estimated Wind Speed: | | |
| Ambient Temperature: | | |
| Description of Sky Conditions (Presence and color of clouds): | | |
| Plume Color: | | |
| Approximate Distance Plume is Visible from Emission Point: | | |

Attachment D (continued) Method 9 Opacity Observations

| Minute | Seconds | | | | 1-minute Avg. % Opacity ¹ | 6-minute Avg. % Opacity ² | Steam Plume (check if applicable) | | Comments |
|---|---------|----|----|----|--------------------------------------|--------------------------------------|-----------------------------------|----------|----------|
| | 0 | 15 | 30 | 45 | | | Attached | Detached | |
| Opacity Readings (% Opacity) ³ | | | | | | | | | |
| 0 | | | | | | N/A | | | |
| 1 | | | | | | N/A | | | |
| 2 | | | | | | N/A | | | |
| 3 | | | | | | N/A | | | |
| 4 | | | | | | N/A | | | |
| 5 | | | | | | | | | |
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| 28 | | | | | | | | | |
| 29 | | | | | | | | | |
| 30 | | | | | | | | | |

The emission unit is in compliance if each six-minute average opacity is less than or equal to 20 %.
 Exception: The emission unit is in compliance if one six-minute average opacity is greater than 20 %, but less than 40 %.

Was the emission unit in compliance at the time of evaluation (yes or no)?

 Signature of Observer

¹ 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.
² 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.
³ Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.

Attachment F

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

| Date | Coating Ingredient | Column A | Column B | Column C | Column D | Column E | Column F | Column G | Column H |
|--|--------------------|--|-------------------------------|----------------------------------|--|---|--|--|----------------------------------|
| | | Enter These Values from Coating Formulation Data | | | | Coating Volume Friction (minus water & non-VOC organic compounds) | Daily Coating Gallons Used (minus water & non-voc organic compounds) | lbs VOC per Gallon (minus water & non-voc organic compounds) | Volume-Weighted Daily lbs of VOC |
| | | Daily Coating Gallons Used | lbs VOC per Gallon of Coating | Water Volume Fraction of Coating | Non-VOC Organic Compounds Volume Fraction of Coating | | | | |
| | | | | | | | | | |
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| | | | | | | | | | |
| Sum of Column F (gallons): | | | | | | | | | |
| | | | | | | | | Sum of Column H (lbs) | |
| ¹Daily Volume-Weighted Average (DAVG_{vw}) = lbs of VOC/gal coating (less water & non-VOC organic Compounds) | | | | | | | | | |

Note 1: Daily Volume-Weighted Average (DAVG_{vw}) = [Sum of Column H ÷ Sum of Column F]

Instructions:

1. Enter values for Columns A, B, C and D from coating formulation data.
2. Calculate volume fraction of coating (minus water & non-VOC organic compounds): [Column E = 1 – (Column C + Column D)]
3. Calculate the daily coating used (minus water & non-voc organic compounds) in gallons in Column F by multiplying daily coating used in gallons [Column A] by volume fraction of coating (minus water & non-VOC organic compounds) (Column E): Column F = [Column A x Column E]
4. Calculate lbs VOC per gallon (minus water & non-voc organic compounds) per coating ingredient in Column G by dividing lbs of VOC per gallon of coating (Column A) by volume fraction of coating (minus water & non-VOC organic compounds) (Column E): Column G = [Column B ÷ Column E]
5. Calculate the volume weighted daily lbs of VOC in Column H per coating ingredient by multiplying the daily coating gallons used (minus water & non-VOC organic compounds) (Column F) by lbs VOC per gallon (minus water & non-voc organic compounds) per coating ingredient (Column G): Column H = [Column F x Column G]
6. Calculate Daily Volume-Weighted Average (lbs of VOC per gal coating (less water & non-VOC organic compounds)) by dividing the daily sum of Column H by daily sum of Column F.

STATEMENT OF BASIS

Voluntary Limitations

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

INSTALLATION DESCRIPTION

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 installation is a synthetic minor source of Volatile Organic Compounds (VOCs), and Hazardous Air Pollutants (HAPs) and a minor source of particulate matter less than ten microns in diameter (PM₁₀), Sulfur Oxides (SO_x), Nitrogen Oxides (NO_x), and Carbon Monoxide (CO).

There are four manufacturing buildings (Buildings 2/5, 3/4, 6/7/8/9 and T-10) and four warehouse buildings (T-11, T12, T15 and T-19). The manufacturing process begins with the assembly of the cases from stainless steel, vinylclad steel, pre-painted coil steel, extruded aluminum, and extruded plastic.

The insulation is injected into the cooler cabinets (EP-10 and EP-11). The foam insulation utilizes exempt VOC, methyl formate blowing agent. The cooler doors are constructed from insulated glass and extruded aluminum and plastic framing (EP-03).

The installation builds its own cooler shelf racks from steel wire stock (EP-03). The wire is cut, formed and welded together. The racks are washed, rinsed, primed in a 5-stage phosphate washer (EP-04) and dried in a natural gas-fired oven. The racks are then dipped in a fluidized bed containing vinyl powder coating (EP-05) and heated in natural gas-fired ovens. There are two 5-stage phosphate wash systems and two vinyl powder coating systems.

Construction of the refrigeration units is accomplished by mounting pre-purchased compressors and heat exchangers to the units and brazing the connecting tubing (EP-07). The wiring, lighting, and refrigeration units are assembled into the cabinets. The refrigerant utilized in charging the units is being switched from R-404a and R-134a to R-290. Currently all 3 refrigerants are being used.. The units are tested for leaks and if the refrigerant needs to be removed, certified refrigerant-recovery machines are used. After full assembly of refrigeration units, final cleaning and wipe-down with solvent (EP-09a) is performed. Solvents used include an acetone/silkscreen cleaner and mineral spirits.

The installation also operates metal parts washers that contain a petroleum naphtha solvent (EP-16) handled by Safety-Kleen.

Large repair operations occur in Building T-11. Satellite paint booths (EP-19) handle large-scale paint repair operations. Each booth is enclosed and utilizes dry filters and carbon filters for VOC capture.

Forklift repair and maintenance operations are conducted in Building 254-Maintenance Garage (EP-18). Building T-12 houses glass frame operations.

Permit Changes:

This section presents the changes that have been made since the current Intermediate Operating Permit (OP2007-018A) was issued (May 23, 2011). The changes include discontinued operations and newly installed emergency generators (EP-27).

Discontinued Operations: EP-01 UV Printers
 EP-06 Dip Paint Line
 EP-08 Cooling Towers
 EP-17 Videojet Printers

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, in tons per year

| Pollutants | Potential Emissions ¹ | Reported Emissions ² | | | | |
|---|----------------------------------|---------------------------------|-------|-------|-------|-------|
| | | 2017 | 2016 | 2015 | 2014 | 2013 |
| Particulate Matter ≤ Ten Microns (PM ₁₀) | 8.01 | 0.17 | 0.21 | 0.26 | 0.36 | 0.21 |
| Particulate Matter ≤ 2.5 Microns (PM _{2.5}) | 8.01 | 0.17 | 0.21 | 0.26 | 0.36 | 0.21 |
| Sulfur Oxides (SO _x) | 0.70 | 0.01 | 0.01 | 0.01 | 0.02 | 0.01 |
| Nitrogen Oxides (NO _x) | 76.87 | 2.32 | 2.60 | 3.19 | 4.25 | 2.60 |
| Volatile Organic Compounds (VOC) | Less than 100 | 9.87 | 18.56 | 11.09 | 19.22 | 22.29 |
| Carbon Monoxide (CO) | 52.71 | 1.19 | 1.14 | 1.11 | 1.42 | 0.98 |
| Hazardous Air Pollutants (HAPs) | Less than 10/25 | — | — | — | — | — |

1. The emissions of PM₁₀, PM_{2.5}, SO_x, NO_x, and CO are calculated based on maximum operation (up to 8760 hours per year except the emergency generators which are calculated based on 500 hours per year) of other emission units. The maximum potential to emit for these pollutants is below the major thresholds of 100 tons per year therefore no plant-wide voluntary limit was taken. The facility has taken voluntary limits of less than 100 tons per year of emissions of VOCs and 10 and 25 tons per year of any individual HAP and total HAP, respectively.
2. Although the reported emissionis includes no values for Hazardous Air Pollutants, the installation did emit Hazardous Air Pollutants during the years 2013-2017. The HAPs emissions were reported as VOCs on Form 2T pages of the Emission Inventory Questionnaires in the applicable years.

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 April 21, 2016; revised June 19, 2018;
- 2) Intermediate Operating Permit OP2007-018 and 018A
- 3) 2017 Emissions Inventory Questionnaire, received April 13, 2018;
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition; and
- 5) Air Pollution Control Program Construction Permits and Permit Determinations:

| Project Number | Description |
|----------------|--|
| AP200302048 | Construction Permit No. 042004-009. A Section (5) permit issued on March 10, 2004 for the construction of a commercial refrigeration manufacturing installation. |
| AP200405132 | Construction Permit No. 042004-009A. Amendment to Permit No 042004-009 for the commercial refrigeration manufacturing installation. This amendment corrected various emission point identification number errors in Construction Permit No 042004-009 for various operations. |
| AP200707108 | Determinations of permit need to install a five stage washer and a dry off oven (EP-20) and a steel electrostatic powder coating and a cure oven (EP-21). According to the application submitted, the volatile organic compounds (VOC) emitted from this project is 2.68 pounds per hour. The pollutant of concern for this project is VOC. The emission increase for all other pollutants are below de minimis levels. The exemptions allowed in Missouri State Rule 10 CSR 10-6.061, Construction Permit Exemptions, Table 1, Insignificant Emission Exemption Levels shows for VOC a rate of 2.75 pounds per hour. Comparison of the applications maximum emission rate values to the insignificance level for VOC indicates that no permit is required as 2.68 pound per hour is less than 2.75 pounds per hour. |
| AP200802084 | Construction Permit No. 042004-009B. Amendment to Permit No 042004-009 for the commercial refrigeration manufacturing installation. This amendment corrected the emission point numbers in the Installation/Project Description and the operating pressure range in the Special Conditions. |
| AP201206012 | Determination of permit need for extending production hours to include a third shift. Since the the project does not cause an increase in potential emissions, no construction permit is required. |
| AP201712033 | Determination of permit need for construction of a 4-stage washer, a 3-stage washer and an oven used for soldering. The 4-stage washer has a 0.9 MMBtu/hr natural gas heater and uses an alkaline cleaner and water. The 3-stage washer has a 0.5 MMBtu/hr natural gas heater and also uses an alkaline cleaner and water. The soldering oven has two 1 MMBtu/hr natural gas burners. This new process will not debottleneck any other operations at the facility. The potential emissions of all pollutants from this project are less than the insignificant emissions exemption levels found in 10 CSR 10-6.061, Construction Permit Exemptions (3)(A)3.A. and Construction Permit Exemptions (3)(A)3.B., there is no construction permit required. |

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

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

40 CFR Part 63, Subpart CCCCCC- *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*

40 CFR Part 60 – Subpart IIII. *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

These rules have not been included in the renewal application; however, it has been determined to be applicable to the installation and, therefore, these rules have been included in this operating permit.

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.

- 1) 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 digital printers.

- 2) 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.

- 3) 10 CSR 10-6.405, *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating.*

This regulation does not apply to the installation. 10 CSR 10-6.405(1)(E) exempts installations which exclusively combust natural gas and fuel oils #2 through #6.

Construction Permit History

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

None

New Source Performance Standards (NSPS) Applicability

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

- 1) 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-04), Wire Shelf Powder Coating (2) & Cure Ovens (EP-05), Cooler Repair Painting Operations (EP-19), Five Stage Washer and Dry-off Oven (EP-20) and Steel Electrostatic Powder Coating and a Cure Oven (EP-21), which are part of the surface coating operation in a large appliance surface coating line.

2) 40 CFR Part 60 – Subpart IIII. *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.*

This subpart is applicable to owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons who construct, reconstruct, or modify an engine after July 11, 2005, where the stationary engine is manufactured after April 1, 2006. A compression ignition is a type of stationary internal combustion engine that is not a spark ignition engine. Listed below are the only engines that this rule applies:

- T10 – Two (2) 200 kW each Emergency Diesel Generators;
- Bldg #5 - 80 kW Emergency Diesel Generator;
- Bldg #4 - 180 kW Emergency Diesel Generator;
- Bldg #7/9 - 400 kW Emergency Diesel Generator

Maximum Achievable Control Technology (MACT) Applicability

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

1) 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.

2) True Manufacturing was issued a construction permit # 042004-009 on March 10, 2004 (before the compliance date of the subparts listed below) 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 following subparts:

- 40 CFR Part 63, Subpart NNNN—*National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances.*
This subpart establishes national emission standards for hazardous air pollutants for large appliance surface coating facility that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP).
- 40 CFR Part 63, Subpart MMMM, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.*
This rule applies to a facility that owns or operates a miscellaneous metal parts and products surface coating operation that is a major source, or is located at a major source, or is part of a major source of HAP emissions. An affected source that uses 946 liters (250 gallons) per year, or more, of coatings that contain hazardous air pollutants (HAP) could be subject to this rule.

- 40 CFR Part 63, Subpart PPPP, *National Emissions Standards for Hazardous Air Pollutants Surface Coating of Plastic Parts and Product.*

This subpart establishes national emission standards for hazardous air pollutants for plastic parts and products surface coating facilities that are major source of HAPs.

- 40 CFR Part 63 Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.*

The Subpart applies to a facility that owns or operates a industrial boilers, institutional boilers, commercial boilers, and process heaters that is a major source, or is located at a major source, or is part of a major source of HAP emissions. A process heater is defined as a unit in which the combustion gases do not directly come into contact with process material or gases in the combustion chamber (e.g., indirect fired). A boiler is defined as an enclosed device using controlled flame combustion and having the primary purpose of recovering thermal energy in the form of steam or hot water.

- 3) 40 CFR Part 63, Subpart CCCCC - *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities.*

The purpose of this subpart is to establish national emission limitations and management practices for hazardous air pollutants (HAP) emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF). The affected source to which this subpart applies is each GDF that is located at an area source.

A gasoline dispensing facility (GDF) is any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. These facilities include, but are not limited to, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps, and other gasoline-fueled engines and equipment.

The installation receives gasoline, stores it in a tank, and dispenses it into motor vehicles and/ or nonroad engines. Therefore, the installation is subject to this rule.

- 4) 40 CFR Part 63, Subpart HHHHHH - *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

This rule applies to area sources that engage in spray application of coatings to a plastic and/or metal substrate where the coatings contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

40 CFR Part 63, Subpart HHHHHH does not apply to this installation because it does not use coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni) or Cadmium (Cd); does not use chemical strippers that contain methylene chloride (MeCl); and is not an auto body refinishing operation that encompass motor vehicle and mobile equipment spray-applied surface coating operations.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M – *National Emission Standard for Asbestos*.

The installation is not subject to any NESHAP standard with the exception of Subpart M - National Emission Standard for Asbestos. The installation is potentially subject to Subpart M. If the installation conducts any demolition or renovation projects to a building(s) containing asbestos, they must determine applicability with the following NESHAP regulations:

- Demolition and Renovation - 40 CFR 61.145
- Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation, and Spraying - 40 CFR 61.150.

Other Regulatory Determinations

- 1) 10 CSR 10-6.260, *Restriction of Emissions of Sulfur Compounds* and 10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*.
10 CSR 10-6.260 was rescinded on November 30, 2015 and replaced by 10 CSR 10-6.261; however, the provisions of 10 CSR 10-6.260 currently remain in the State Implementation Plan and thus are federally enforceable. True Manufacturing is not subject to these rules because:
 - a) According to 10 CSR 10-6.260(1)(A)(2) and 10 CSR 10-6.261(1)(A), natural gas and liquefied petroleum gas (propane) fired sources are exempt from the requirements of these rules.
 - b) According to 10 CSR 10-6.260(1)(A)(1) and 10 CSR 10-6.261(1)(C), emission units subject to a more restrictive SO₂ emission limit or more restrictive fuel sulfur content limit under 10 CSR 10-6.070 or any federally enforceable permit are exempt from the requirements of these rules. The emergency generators are subject to a sulfur standard according to 40 CFR Part 60, Subpart III; therefore, these generators are exempt from the requirements of this rule.

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

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

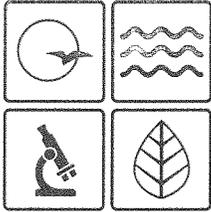
- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does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

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

Response to Public Comments

The draft Intermediate Operating Permit for True Manufacturing Company was placed on public notice as of August 3, 2018 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notice.htm> on Friday, August 3, 2018. The Air Pollution Control Program did not receive any public comments during the 30-day comment period.

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Missouri Department of

dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

OCT 01 2018

Mr. Steven Trulaske
True Manufacturing Company
2001 East Terra Lane
O'Fallon, MO 63366

Re: True Manufacturing Company, 183-0184
Permit Number: OP2018-076

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 that you read and understand the requirements contained in your permit.

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

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

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2451. You may also contact me with the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS:bgj

Enclosures

c: PAMS File: 2016-04-042

