

Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

JAN 07 2019

Mr. Donald E. Smith
Undercover, Inc.
59 Absolute Drive
Rogersville, MO 65742

Re: Undercover, Inc., 225-0045
Permit Number: OP2019-001

Dear Mr. Smith:

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 days after the date this decision was mailed or the date it was delivered, whichever date is earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:kwj

Enclosures

c: PAMS File: 2018-03-039



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PERMIT TO OPERATE INTERMEDIATE STATE

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: OP2019-001
Expiration Date: JAN 07 2024
Installation ID: 225-0045
Project Number: 2018-03-039

Installation Name and Address

Undercover, Inc.
59 Absolute Drive
Rogersville, MO 65742
Webster County

Parent Company's Name and Address

Truck Hero, Inc.
5400 South State Street
Ann Arbor, MI 48108

Installation Description:

Undercover, Inc. manufactures Acrylonitrile Butadiene Styrene (ABS) plastic bed covers for pickup trucks. Undercover, Inc. utilizes six coating booths, one cleaning booth, a sanding booth and 11 natural gas ovens. Undercover, Inc. is a synthetic minor source of VOCs and HAPs.

JAN 07 2019

Effective Date

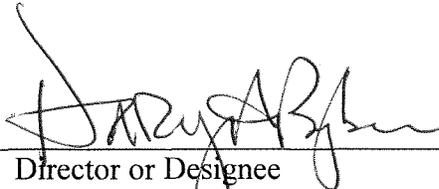

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION EQUIPMENT LISTING	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS	3
II. PLANT WIDE EMISSION LIMITATIONS.....	4
PERMIT CONDITION PW001	4
10 CSR 10-6.065 Operating Permits (Voluntary Limitation).....	4
PERMIT CONDITION PW002	4
10 CSR 10-6.060 Construction Permits Required	4
Construction Permit 072011-011, Issued July 22, 2011	4
PERMIT CONDITION PW003	5
10 CSR 10-6.060 Construction Permits Required	5
Construction Permit 072011-011, Issued July 22, 2011	5
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	6
PERMIT CONDITION 001	6
10 CSR 10-6.060 Construction Permits Required	6
Construction Permit 072011-011, issued July 22, 2011	6
PERMIT CONDITION 002	7
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants.....	7
IV. CORE PERMIT REQUIREMENTS	8
V. GENERAL PERMIT REQUIREMENTS.....	13
VI. ATTACHMENTS	17
ATTACHMENT A	18
VOC Emission Tracking.....	18
ATTACHMENT B1	19
Individual HAP Emission Tracking.....	19
ATTACHMENT B2.....	21
Total HAP Emission Tracking.....	21
ATTACHMENT C1.....	22
Permitted Materials.....	22
ATTACHMENT C2.....	23
Alternative Materials	23
ATTACHMENT D	27
Method 22 Visible Emissions Observations	27
ATTACHMENT E.....	28
Inspection/Maintenance/Repair/Malfunction Log	28

I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

Emission Source	Description	Control Device
EP-02	Parts cleaning (sanding)	3-Door Booth with vacuum attached to sanders, with filtered collection system
EP-03	(6) Coating booths with HVLP guns: (1) Sealer Booth (3) Base Coat (color) Paint Booths (2) Clear Coat Booths (1) cleaning booth with HVLP guns	CD-01 (Fabric Filter)
EP-04	Gun/Line Cleaning	CD-02 (Fabric Filter)
EP-05	Glue Application	-

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Source	Description
EP-01	(11) natural gas ovens, 17 MMBtu/hr total

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

10 CSR 10-6.065 Operating Permits (Voluntary Limitation)

Emission Limitation:

The permittee shall emit less than 100.0 tons of volatile organic compounds (VOCs) in any consecutive 12-month period from the entire installation.

Monitoring/Recordkeeping:

- 1) The permittee shall record monthly and consecutive 12-month totals of VOC emissions using Attachment A, or an equivalent form.
- 2) The permittee shall keep all records for at least 5 years, including SDS, and shall make them available to any Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which the records indicate that the emission limitation have been exceeded.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required
Construction Permit 072011-011, Issued July 22, 2011

Emission Limitation:

The permittee shall emit less than 10.0 tons of each individual hazardous air pollutant (HAP) and 25.0 tons of total HAPs in any consecutive 12-month period from the entire installation. [Special Condition 1B]

Monitoring/Recordkeeping:

- 1) The permittee shall record monthly and consecutive 12-month totals of HAP emissions using Attachments B1 and B2, or equivalent forms. [Special Condition 1C]
- 2) The permittee shall keep all records for at least 5 years, including SDS, and shall make them available to any Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which the records indicate that the emission limitation have been exceeded.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.

PERMIT CONDITION PW003

10 CSR 10-6.060 Construction Permits Required
Construction Permit 072011-011, Issued July 22, 2011

Operational Requirement:

The permittee shall keep all chemicals (i.e. coatings, cleaners, glue, etc.) in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all chemical containers used at the installation. [Special Condition 4A]

Alternative Materials:

- 1) When considering alternative coatings, cleaners, and/or glue that are different from materials listed in Attachment C1, the permittee shall calculate the potential emissions of each individual HAP, PM₁₀, and VOC in all coatings, cleaners, and glues to compare them to the insignificance levels in 10 CSR 10-6.061. [Special Condition 3A]
- 2) The permittee shall seek approval from the Air Pollution Control Program before use of the alternative material if the potential individual emissions for HAP, PM₁₀, and VOC for the installation are equal to or greater than the insignificance levels. [Special Condition 3B]
- 3) The permittee shall include emissions for all alternative materials in the compliance demonstrations attachments for Permit Conditions PW001 and PW002.

Monitoring/Recordkeeping:

- 1) The permittee shall use Attachment C2 or an equivalent form to show compliance with the requirements that comes with the use of any alternative coatings, cleaners, and/or glue not included in Attachment C1.
- 2) The permittee shall keep records of all SDS for all materials used. [Special Condition 5A]
- 3) The permittee shall keep all records for at least 5 years and shall make them available to any Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which the records indicate that the emission limitation have been exceeded.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001		
10 CSR 10-6.060 Construction Permits Required Construction Permit 072011-011, issued July 22, 2011		
Emission Source	Description	Control Device
EP-02	Parts cleaning (sanding)	3-Door Booth with vacuum attached to sanders, with filtered collection system
EP-03	(6) coating booths and (1) cleaning booth	CD-01 (Fabric Filter)
EP-04	Gun/Line Cleaning	CD-02 (Fabric Filter)

Operational Limitations:

- 1) The permittee shall control emissions from coating spray guns and the sander using booths equipped with filters as specified in this permit condition. [Special Condition 2A]
- 2) The permittee shall operate and maintain the coating booths, sanding booth, and the filters in accordance with the manufacturer's specifications. [Special Condition 2B]
- 3) The permittee shall keep replacement filters on hand at all times. The filters shall be made of fibers appropriate for the operating conditions expected to occur (i.e., temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 2D]

Monitoring/Recordkeeping:

- 1) The permittee shall use visible emissions as an indicator of the as permitted installation and operation of the filters. During as permitted operations, no visible emissions are expected from the exhausts of the filters and from the booths. The existence of visible emissions from the exhausts and booths indicates a decrease in the efficiency or malfunctioning of the filters. The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22 as follows: [Special Condition 2C]
 - a) Visible emissions from the exhaust and the booths shall be monitored on a daily basis when the process is in operation using Attachment D or an equivalent form.
 - b) The observation shall be for a two minute time period.
 - c) The condition of no visible emissions is considered normal for the operation of the filters. When visible emissions are noted from the exhausts, corrective action shall be taken.
- 2) The permittee shall maintain an operating and maintenance log for the filters using Attachment E or an equivalent form which shall include the following: [Special Condition 2D]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions.
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 3) The permittee shall maintain all records required by this permit for no less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 5A]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit. [Special Condition 5B]
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.

PERMIT CONDITION 002		
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants		
Emission Source	Description	Control Device
EP-02	Parts cleaning (sanding)	3-Door Booth with vacuum attached to sanders, with filtered collection system
EP-03	(6) coating booths and (1) cleaning booth	CD-01 (Fabric Filter)
EP-04	Gun/Line Cleaning	CD-02 (Fabric Filter)

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 60 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/Recordkeeping/Reporting:

As detailed in Permit Condition 001.

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), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

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

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

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

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

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

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

10 CSR 10-6.170

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

Emission Limitation:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

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

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

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”;
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.

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- 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.
 - 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.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

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

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

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.I Reasonably Anticipated Operating Scenarios

The permittee may use alternative coatings as specified in Permit Condition PW003.

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 EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions
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- 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 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 Donald E. Smith, General Manager. 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 shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) or the Environmental Protection Agency (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.

From Natural Gas Combustion			
Emission Source	Monthly Usage	Individual HAP Emission Factor ¹²	Individual HAP Emissions ¹³ (Tons)
Natural Gas Combustion	MMscf	lb/MMscf	

These HAP emission factors shall be used for Natural Gas Combustion (obtained from AP-42 Section 1.4 (July 1998)):

HAP Emission Factor Table		
CAS No.	Individual HAP Name	Emission Factor (lb/MMscf)
-	Polycyclic Organic Matter	8.82×10^{-5}
71-43-2	Benzene	0.0021
106-46-7	Dichlorobenzene	0.0012
50-00-0	Formaldehyde	0.075
110-54-3	Hexane	1.8
91-20-3	Naphthalene	6.1×10^{-4}
108-88-3	Toluene	0.0034
20-01-9	Arsenic Compounds	2.0×10^{-4}
20-03-1	Beryllium Compounds	1.2×10^{-5}
20-04-2	Cadmium Compounds	0.0011
20-06-4	Chromium Compounds	0.0014
20-07-5	Cobalt Compounds	8.4×10^{-5}
20-11-1	Lead Compounds	5.0×10^{-4}
20-12-2	Manganese Compounds	3.8×10^{-4}
20-13-3	Mercury Compounds	2.6×10^{-4}
20-14-4	Nickel Compounds	0.0021
20-16-6	Selenium Compounds	2.4×10^{-5}

Sum the Individual HAP Emissions from all tables of this attachment:

Monthly Individual HAP Emissions¹⁴ (tons):	
12-Month Rolling Total Individual HAP Emissions¹⁵ (tons):	

¹² Obtained from AP-42 Section 1.4. See HAP Emission Factor Table in this attachment.

¹³ Ind. HAP Emissions (tons) = Monthly Usage x Ind. HAP Emission Factor x 0.0005 (ton/lb)

¹⁴ Monthly Ind. HAP emissions = the sum of all Ind. HAP emissions from this attachment.

¹⁵ 12-Month Rolling Total Ind. HAP Emissions = the sum of the 12 most recent Monthly Ind. HAP emissions (tons). Includes SSM emissions per 10 CSR 10-6.050 as reported to the Compliance/Enforcement Section. **12-month Rolling total HAP emissions of less than 10.0 tons indicates compliance with Permit Condition PW002.**

Attachment C1
 Permitted Materials

These materials were permitted under Construction Permit 072011-011:

Cleaners	
Material Type	Product Number
Cleaner 1	106
Cleaner 2	V-3921S
Sealers	
Material Type	Product Number
Base	42410S
Base	42440S
Base	42470S
Reducer	42475S
Activator	12305S
Paints	
Material Type	Product Number
Base	KK700FX
Base	KK710FX
Base	KK720FX
Base	KK730FX
Base	KK740FX
Base	KK760FX
Reducer	12035S
Reducer	7160S
Reducer	7175S
Reducer	7185S
Reducer	WB-2040
Reducer	WB-2090
Clear Coats	
Material Type	Product Number
Base	15305S
Activator	8430S
Glue	
Material Type	Product Number
-	XP-154

Attachment C2
Alternative Materials

If the permittee wishes to use alternative coatings/materials in these paint booths, the permittee shall evaluate the potential-to-emit (PTE) using that alternative coating/material in the associated paint booth. The PTE should meet all of the following items:

- The new coating/material at the maximum hourly design rate (MHDR) results in an increase in potential combined HAP emissions less than or equal to 0.5 lb/hr [10 CSR 10-6.061(3)(A)3.B]
- The new coating/material at MHDR results in an increase in potential individual HAP emissions less than or equal to that individual HAP's respective SMAL. The Air Pollution Control Program's current list of SMALs is available at: <http://www.dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf>. [10 CSR 10-6.061(3)(A)3.B]
- The new coating/material at MHDR results in an increase in potential VOC emissions less than or equal to 2.75 lb/hr. [10 CSR 10-6.061(3)(A)3.A]
- The new coating/material at MHDR results in an increase in potential PM₁₀ emissions less than or equal to 1.0 lb/hr. [10 CSR 10-6.061(3)(A)3.A]

If the new coating/material does not meet all of the above listed items, the permittee shall contact the Air Pollution Control Program before using the alternative coating/material to determine if a construction permit is required.

The permittee shall use the following tables (or equivalents) to calculate (controlled) PTE of an alternative coating/material:

Fill out for each new Alternative Coating/Material:

Name of Alternative Coating/Material: _____
 Material Use¹⁷: _____
 Material Type¹⁸: _____
 Emission Source: _____

PM ₁₀ PTE Calculation							
MHDR (gal/hr)	Mixture Fraction ¹⁹ (%)	Density ²⁰ (lb/gal)	Solid Content ²⁰ (wt%)	Assumed PM ₁₀ ²¹ (%)	Overspray ²² (%)	Overall Control Efficiency ²³ (%)	PM ₁₀ PTE ²⁴ (lb/hr)

VOC PTE Calculation				
MHDR (gal/hr)	Mixture Fraction ¹⁹ (%)	Density ²⁰ (lb/gal)	VOC Content ²⁰ (wt%)	VOC PTE ²⁵ (lb/hr)

¹⁷ Cleaner, sealer, paint, glue, or clear coat

¹⁸ Base, reducer, activator, glue, or cleaner 1 or 2

¹⁹ Fraction of this new material in relation to the total mixture of bases, reducers, and activators.

²⁰ From the SDS. If a range is given, use the highest value in the range.

²¹ Percentage of PM₁₀ out of all PM. Assume 80% PM₁₀ for paints, sealers, and clear coats. The particle sized distributions were taken from the paper: *Size Distribution of Chromate Paint Aerosol Generated in a Bench-Scale Spray Booth*, published by in the *Annals of Occupational Hygiene* in 2005 as used in Construction Permit 072011-011. For other materials, assume 100% PM₁₀.

²² 50% Overspray shall only be applied to PMs and HAP-PMs if used in a paint booth with a filter. For VOCs and HAP-VOCs 100% overspray shall be assumed.

²³ 99% overall control efficiency if used in a paint booth with a filter.

²⁴ [PM₁₀ PTE] = [MHDR] × [Mix Fraction] × [Density] × [Solids Content] × [Assumed PM₁₀] × [Overspray] × (1 – [Overall Control Efficiency]).

²⁵ [VOC PTE] = [MHDR] × [Mix Fraction] × [Density] × [VOC Content]

Individual HAP PTE Calculation								
MHDR (gal/hr)	Mixture Fraction ¹⁹ (%)	Density ²⁰ (lb/gal)	HAP (CAS, Name)	Individual HAP Content ²⁰ (wt%)	Assumed PM ₁₀ ²¹ (%)	Overspray ²² (%)	Overall Control Efficiency ²⁶ (%)	Individual HAP PTE ²⁷ (lb/hr)
Total HAP PTE of Alternative Material (lb/hr):								

²⁶ 99% control efficiency shall only be applied to HAP-PMs. Control efficiency of 0% shall be applied to HAP-VOCs.

²⁷ For HAP-VOCs: [Individual HAP PTE] = [MHDR] × [Density] × [Individual HAP Content]

For HAP-PMs: [Individual HAP PTE] = [MHDR] × [Density] × [Individual HAP Content] × [Assumed PM₁₀] × [Overspray] × (1 – [Overall Control Efficiency]). Use 80% for [PM₁₀ Content], 50% for [Overspray], and 99% for [Overall Control Efficiency].

Total Potential to Emit Summary	
Pollutant	Alternative Material PTE (lb/hr)
PM ₁₀	
VOC	
Total HAP	
HAP:	
Results	
Does the new alternative material have a PTE ≤ 1.0 lb/hr PM₁₀? (Yes/No)	
Does the new alternative material have a PTE ≤ 2.75 lb/hr VOC? (Yes/No)	
Does the new alternative material have a PTE ≤ SMAL for each individual HAP? (Yes/No)	
Does the new alternative material have a PTE ≤ 0.5 lb/hr total HAP? (Yes/No)	
If the permittee answered 'yes' for all of the questions, the permittee is exempt from needing a construction permit for using the new material(s). If the permittee answered 'no' for any of the above questions, the permittee shall contact the Missouri Air Pollution Control Program before using the new material(s) to determine construction permit need.	

The permittee shall use the following information in the above PTE tables:

The following is the permitted MHDR for the associated activities:

Emission Source	MHDR (gal/hr)
EP-03 Glue	0.0417
EP-03 Sealers	2.93
EP-03 Paints	7.03
EP-03 Clear Coats	8.79
Replacement cleaner for 106's uses ("Cleaner 1") ²⁸	0.625
Replacement cleaner for V-3921S's uses ("Cleaner 2") ²⁹	0.411

²⁸ Cleaner 1's use is for flushing out the spray guns and parts cleaning.

²⁹ Cleaner 2's use is for cleaning the lids of truck covers.

Attachment D

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.

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

Undercover, Inc. manufactures Acrylonitrile Butadiene Styrene (ABS) plastic bed covers for pickup trucks. Undercover, Inc. utilizes six coating booths, one final cleaning booth, a sanding booth and 11 natural gas ovens. Undercover, Inc. is a synthetic minor source of VOCs and HAPs.

Potential to Emit (PTE) for the Installation and Reported Air Pollutant Emissions, tons per year

Pollutants	PTE ³⁰	Reported ³¹	
		2017-2015	2014-2013
Particulate Matter ≤ Ten Microns (PM ₁₀)	2.10	0.02	0.04
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	1.23	0.02	0.04
Sulfur Oxides (SO _x)	0.04	< 0.01	< 0.01
Nitrogen Oxides (NO _x)	7.30	0.29	0.63
Volatile Organic Compounds (VOC)	< 100	21.79	31.42
Carbon Monoxide (CO)	6.13	0.25	0.53
Hazardous Air Pollutants (HAPs)	< 25	6.25	7.63
Ethylbenzene (100-41-4)	< 10	0.52	0.52
Isomers of Xylene (1330-20-7)	< 10	1.97	1.97
Glycol Ethers (20-10-0)	< 10	0.47	0.47
Toluene (108-88-3)	< 10	0.04	0.88

³⁰PTE was obtained from Construction Permit 072011-011.

³¹ Full EIQs were submitted in 2014 and 2017. Reduced EIQs were submitted in 2013, 2015 and 2016.

Pollutants	PTE ³⁰	Reported ³¹	
		2017-2015	2014-2013
N-Hexane (110-54-3)	< 10	0.31	0.85
N,N-Dimethylaniline (121-69-7)	< 10	1.47	1.47
Methyl methacrylate (80-62-6)	< 10	1.47	1.47

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 March 19, 2018;
- 2) 2017 Emissions Inventory Questionnaire, received April 19, 2018;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) WebFIRE;
- 5) Construction Permit 072011-011, issued July 22, 2011

Construction Permit History

Construction Permit 072011-011, issued July 22, 2011

This Section (6) construction permit was issued for the installation of six coating booths, one cleaning booth, one sanding booth, and 11 natural gas ovens. It contains five special conditions.

- Special Condition 1A restricts VOC emissions to less than 250 tons per 12-month consecutive period. It was not included in this operating permit due to Permit Condition PW001 being more stringent. Special Condition 2B restricts HAP emissions and 1C requires recordkeeping. They have been incorporated into the operating permit.
- Special Condition 2 requires emissions from the spray guns and sanders to be controlled with booths and filters. It has been incorporated into the operating permit.
- Special Condition 3 contains alternative material conditions. It has been incorporated into the operating permit, albeit modified. It only takes in account HAP emissions for the insignificance level, but it should evaluate the insignificance levels of of PM₁₀ and VOC as well. Conditions to check for the insignificance levels of PM₁₀ and VOC have been added to this operating permit.
- Special Condition 4 contains operational requirements to keep all chemicals in sealed containers when not in use. It has been incorporated into the operating permit.
- Special Condition 5 contains general recordkeeping and reporting requirements that have been incorporated into the operating permit.

Missouri Code of State Regulations (CSR) Applicability

10 CSR 10-6.100, *Alternate Emission Limits*

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

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

While this rule applies, the permittee has the potential to emit < 0.5 lb/hr PM from its emission sources (see Attachment C2). Because of this low value, visible emissions beyond the boundary of the property are not expected. As a result, monitoring and recordkeeping requirements of this rule have been removed from the operating permit.

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

This rule applies and has been applied within the operating permit. Construction Permit 072011-011 requires visible emission monitoring that is sufficient for compliance with the requirements of this rule. Visible emissions are not expected from the subject emission sources and are a sign of startup, shutdown, and malfunction (SSM) conditions as reported under 10 CSR 10-6.050. Because Permit Condition 001 requires corrective action to be taken upon observation of any visible emissions and because visible emissions are not expected from the subject emission sources, it is not expected that they will emit greater than their opacity limitations.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

The 11 natural gas ovens (EP-01) are exempt from these rules per 6.260(1)(A)(2) and 6.261(1)(A).

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

This rule does not apply. The particulate emission sources have federally required control devices that exceed 90% control efficiency and are thus exempt per (1)(B)15. The natural gas ovens are not subject to this rule due to not meeting the definition of 'process weight' in 10 CSR 10-6.020.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*

The 11 natural gas ovens (EP-01) are direct heating sources and are thus not subject to the provisions of this rule.

New Source Performance Standards (NSPS) Applicability

None.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart IIII – *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks*

This rule does not apply to this facility because this facility is not a major source for HAPs. It has accepted HAP limits to make it an area source of HAPs.

40 CFR Part 63, Subpart PPPP – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products*

This rule does not apply to this facility because this facility is not a major source for HAPs. It has accepted HAP limits to make it an area source of HAPs.

40 CFR Part 63, Subpart JJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*

The 11 natural gas ovens (EP-01) are not considered boilers as defined in §63.11237, and is thus not subject to this rule.

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 does not apply to this facility because while they do spray apply coatings, they do not spray apply them to motor vehicles and mobile equipment as defined in this subpart. Mobile equipment is defined as any device that may be drawn and/or driven on the roadway. Motor Vehicles are defined as any self-propelled vehicle. The permittee only manufacturers and paints plastic bed covers for pickup trucks. These plastic bed covers do not meet the definition of a motor vehicle or mobile equipment.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Greenhouse Gas Emissions

This installation may be a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO₂e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂e emissions were not included within this permit.

Other Regulatory Determinations

None.

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

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

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

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the ACP'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 ACP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

The draft permit was put up on public notice on November 23, 2018 for a period of 30 days. During this time no comments were received.