



**Missouri Department of Natural Resources**  
**Air Pollution Control Program**

# INTERMEDIATE STATE PERMIT TO OPERATE

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

**Intermediate Operating Permit Number:** OP2011-063  
**Expiration Date:** JAN 22 2017  
**Installation ID:** 510-0097  
**Project Number:** 2010-05-002

**Installation Name and Address**

U.S. Paint Corporation  
831 South 21st Street  
St. Louis, MO 63103  
City of St. Louis

**Parent Company's Name and Address**

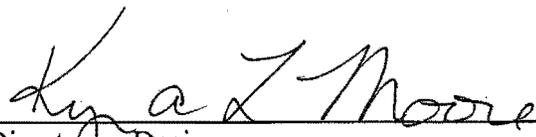
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**Installation Description:**

U.S. Paint Corporation (US Paint) is a paint manufacturer (SIC 2851) located in an industrial area south of downtown St. Louis. The installation is an existing synthetic minor source of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The installation also emits less than de minimis levels of particulate matter less than or equal to ten microns (PM<sub>10</sub>), as reported on their Emissions Inventory Questionnaire (EIQ), but does not emit significant amounts of any other regulated pollutant. US Paint develops and manufactures high performance paints and primers for specialized industrial and OEM (Original Equipment Manufacturer) markets. Raw materials such as resins, solvents and pigments are received via drums, bags and bulk. They are gathered, mixed and processed per the instructions on a batch ticket, and then they are tested and approved by Quality Control. Finished products are packaged in containers ranging in size from one pint to 250 gallons, then stored in warehouses on site and distributed to customers via trucks.

JAN 23 2012

Effective Date

  
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Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

U.S. Paint Corporation (US Paint) is a paint manufacturer (SIC 2851) located in an industrial area south of downtown St. Louis. The installation is an existing synthetic minor source of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The installation also emits less than de minimis levels of particulate matter less than or equal to ten microns (PM<sub>10</sub>), as reported on their Emissions Inventory Questionnaire (EIQ), but does not emit significant amounts of any other regulated pollutant. US Paint develops and manufactures high performance paints and primers for specialized industrial and OEM (Original Equipment Manufacturer) markets. Raw materials such as resins, solvents and pigments are received via drums, bags and bulk. They are gathered, mixed and processed per the instructions on a batch ticket, and then they are tested and approved by Quality Control. Finished products are packaged in containers ranging in size from one pint to 250 gallons, then stored in warehouses on site and distributed to customers via trucks.

The installation has the potential to be a major source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). However, the installation, in their Intermediate Operating Permit application, is voluntarily limiting the plant wide emissions to less than 100 tons per year for VOCs, less than ten tons per year for each HAP, and less than 25 tons per year total HAPs, on a 12-month rolling average.

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

<b>Reported Air Pollutant Emissions, tons per year</b>					
Pollutants	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	2.62	2.42	3.72	4.54	3.79
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.00	0.00	0.00	0.00	0.00
Sulfur Oxides (SO <sub>x</sub> )	0.00	0.00	0.00	0.00	0.00
Nitrogen Oxides (NO <sub>x</sub> )	0.00	0.00	0.00	0.00	0.00
Volatile Organic Compounds (VOC)	24.00	20.49	33.00	38.37	33.06
Carbon Monoxide (CO)	0.00	0.00	0.00	0.00	0.00
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	3.93	2.25	3.83	4.00	5.18
Ammonia (NH <sub>3</sub> )	0.00	0.00	0.00	0.00	0.00

**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
EU0010 - EU0150	Three (3) Aboveground storage tanks with a total capacity of 60,000 gallons. Each tank is subdivided into 5 compartments of various sizes. - TK 1, 4000 gal Stainless Steel Tank - TK 2, 3000 gal Stainless Steel Tank - TK 3, 6000 gal Stainless Steel Tank - TK 4, 4000 gal Stainless Steel Tank - TK 5, 3000 gal Stainless Steel Tank - TK 6, 6000 gal Stainless Steel Tank - TK 7, 2000 gal Stainless Steel Tank - TK 8, 4000 gal Stainless Steel Tank - TK 9, 2000 gal Stainless Steel Tank - TK 10, 6000 gal Stainless Steel Tank - TK 11, 4000 gal Stainless Steel Tank - TK 12, 3000 gal Stainless Steel Tank - TK 13, 6000 gal Stainless Steel Tank - TK 14, 4000 gal Stainless Steel Tank - TK 15, 3000 gal Stainless Steel Tank
EU0160	Paint Spray Booth in QC Lab (#2) (EP16)
EU0170 - EU0210	Five (5) Shading Air Mixers (D/PM16, D/PM17, D/PM18, D/PM19, and D/PM20)
EU0270	2000 Gallon Mixing Tank (Tank 9). (D/TKM#9)
EU0300	Automotive/Industrial Laboratory Spray Booth (Lab #3 Mill Room)
EU0320	Premier Submersible Mill (D/PSM400)
EU0330 – EU0350	Three (3) Premier Submersible Mills (D/PSM300, D/PSM200, D/PSM100)
EU0360	Fairing Compound Mixer (E/TMX1)
EU0370	Hockmeyer Paddle Mixer (C/PM1)
EU0380	Paddle Mixer (C/PM2)
EU0390	Expansion Area Spray Booth (EP7)
EU0400	Dust Collectors (D/DC1, E/DC1, N/DC1, SB/DC1)
EU0430	Tank Washer (E/TW)
EU0440	Isocyanate Mixers
EU0450	PSM700 Submersible Mill (D/PSM700)
EU0460	Parts Washer
EU0470 – EU0510	Five (5) Bank of Mixers (D/PM11, D/PM12, D/PM13, D/PM14, D/PM15)
EU0520	Horizontal Mill in Small Batch (SB/HM2)
EU0530	Drum/Container Washing Process

## **EMISSION UNITS WITHOUT LIMITATIONS**

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

### **Description of Emission Source**

Distillation unit (entire distillation) process is made up of the following equipment

- One vessel with a 5 HP motor
- One 600 gallon dirty solvent tank
- One 60 gallon clean solvent tank- One 600 gallon clean solvent tank

Fugitive emissions from general mixing and handling of production paint manufacturing were lumped under one emission point.

- 4 can/drum fillers (C/DFM1, C/DFM2, C/NFM2, C/NFM3)
- Paddle mixer (C/PM3)
- Myers mixers (D/D1), (D/D10), (E/D1), (E/D6)
- Hockmeyer press (fairing compound filler in C building)
- Two twin tanks each with 750-gal capacity and 1 Myers mixer (D/D13, D/D14)
- Myers mixer with one 1.5-kgal tank (D/D12)
- Kady Mixer (D/KD1)
- Cowles Mixers (D/D7), (D/PM6), (E/D2), (E/D5), (E/PM3), (E/D3), (E/D7)
- Mixer (D/D9)
- Wall tanks D-1 thru D-8, 2300-gal, Top fill; 5HP (D/TKM#1), (D/TKM#2), (D/TKM#3), (D/TKM#4), (D/TKM#5), (D/TKM#6), (D/TKM#7), (D/TKM#8)
- Sandmill (D/SM2)
- Horizontal Mill (D/HM3, (D/HM9), (D/HM12)
- Solvent/resin pump station

Natural gas heaters

20 Above Ground Storage Tanks in Hot Room

- |         |                     |          |                     |
|---------|---------------------|----------|---------------------|
| - Tk 1A | 2,700 gallon; Resin | - Tk 6A  | 2,000 gallon; resin |
| - Tk 1B | 2,700 gallon; resin | - Tk 6B  | 2,000 gallon; resin |
| - Tk 2A | 2,700 gallon; resin | - Tk 7A  | 2,000 gallon; resin |
| - Tk 2B | 2,700 gallon; resin | - Tk 7B  | 2,000 gallon; resin |
| - Tk 3A | 2,700 gallon; resin | - Tk 8A  | 2,000 gallon; resin |
| - Tk 4A | 2,700 gallon; resin | - Tk 8B  | 2,000 gallon; resin |
| - Tk 4B | 2,700 gallon; resin | - Tk 9A  | 2,000 gallon; resin |
| - Tk 4C | 2,700 gallon; empty | - Tk 9B  | 2,000 gallon; resin |
| - Tk 5A | 2,000 gallon; resin | - Tk 10A | 2,000 gallon; resin |
| - Tk 5B | 2,000 gallon; resin | - Tk 10B | 2,000 gallon; resin |

Miscellaneous Laboratory Equipment Including:

- Quality Control Paint Spray Booth #1 with Dry Filters (EP5)
- Lab #1 Spray booth (EP8)
- Lab #2 Spray booth (EP9)
- Various mixers
- Various ovens
- Various horizontal mills
- Various environmental testing equipment
- Wash tanks (contains acetone)

Miscellaneous Small Batch Equipment

- Small Batch Spray Booth with Dry Filters (EP6)
- 3 small batch ovens
- 1 small batch horizontal sand mill
- 16 Fawcett air mixers- High speed mixer
- Wash tanks (contains acetone)

## 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.

### Permit Condition PW001

#### 10 CSR 10-5-390 Control of Emissions From Manufacture of Paints, Varnishes, Lacquers, Enamels and Other Allied Surface Coating Products

##### Operational Limitation/Equipment Specifications:

No owner or operator of a manufacturing installation producing paints, varnishes, lacquers, enamel or other allied surface coating products shall cause or allow the manufacture of these products unless the operating equipment meets the requirements contained in this rule and without adhering to operating procedures specified in this rule and operating procedures recommended by the equipment manufacturer and approved by the Director.

- 1) Tanks storing VOC with a vapor pressure greater than or equal to 10 kilopascals (kPa) (1.5 psi) at twenty degrees Celsius (20°C), shall be equipped with pressure/vacuum conservation vents set at  $\pm$  0.2 kPa (0.029 psi), except where more effective air pollution control is used. Stationary VOC storage containers with a capacity greater than two hundred fifty (250) gallons shall be equipped with a submerged-fill pipe or bottom fill, except where more effective air pollution control is used and has been approved by the Director.
- 2) Covers shall be installed on all open-top tanks used for the production of non-waterbase coating products. These covers shall remain closed except when production, sampling, maintenance or inspection procedures require operator access.
- 3) Covers shall be installed on all tanks containing VOC used for cleaning equipment.
- 4) All grinding mills shall be operated and maintained in accordance with manufacturers' specifications.

##### Monitoring/Recordkeeping:

- 1) Records shall be kept on production rates sufficient to determine daily VOC emissions.
- 2) The permittee shall keep records for a period of not less than five (5) years.
- 3) All these records shall be made available to the Director upon request.

##### Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen days after any exceedance of any of the terms imposed by this regulation.

**Permit Condition PW002**

**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)  
10 CSR 10-6.060 Construction Permits Required  
St. Louis City APCP Construction Permit No. 07-02-001**

**Emission Limitation:**

- 1) The permittee shall emit less than ten tons of any individual HAP in any consecutive 12-month period; and
- 2) The permittee shall emit less than 25 tons of any combination of HAPs in any consecutive 12-month period.

**Monitoring/Recordkeeping:**

The permittee shall maintain an accurate record of emissions of HAPs emitted into the atmosphere from this installation. Example forms are attached as Attachments A and B. The permittee may use these forms, or forms of its own, so long as the forms used will accurately demonstrate compliance with the HAPs emission limitation (less than ten tons in any consecutive 12-month period of any individual HAP or less than 25 tons in any consecutive 12-month period of any combination of HAPs).

**Reporting:**

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen days after any exceedance or deviation from this permit condition.

**Permit Condition PW003**

**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)  
10 CSR 10-6.060 Construction Permits Required  
St. Louis City APCP Construction Permit No. 07-02-001**

**Emission Limitation:**

The Permittee shall emit into the atmosphere less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.

**Monitoring/Recordkeeping:**

The permittee shall maintain an accurate record of emissions of VOCs emitted into the atmosphere from this installation. The permittee shall record the monthly and running 12-month totals of the VOC emissions from this installation. Example form is attached as Attachment C (Plant-Wide Emissions Tracking Record). The permittee may use this form, or forms of its own, so long as the forms used will accurately demonstrate compliance with the VOC emission limitation (less than 100 tons in any consecutive 12-month period of VOCs).

**Reporting:**

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen days after any exceedance or deviation from this permit condition.

### 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.

<b>EU0010 through EU0150 – 15 Above Ground Storage Tanks</b>		
<b>Emission Unit</b>	<b>Description</b>	<b>2010 EIQ Reference #</b>
EU0010 - EU0150	Three (3) Aboveground storage tanks with a total capacity of 60,000 gallons. Each tank is subdivided into five different compartments of various sizes.	EP18

<p><b>Permit Condition EU0010-001 through EU0150-001</b>  <b>10 CSR 10-6.060 Construction Permits Required</b>  <b>St. Louis City ACP Construction Permit No. 98-08-055 &amp;98-08-055A</b></p>
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**Emission Limitation:**

The total VOC emissions from all tanks combined shall not exceed one (1) ton in any consecutive twelve (12)-month period.

**Operational Limitation/Equipment Specification:**

- 1) Tanks storing VOC containing material with a vapor pressure greater than or equal to 1.5 pounds per square inch (psi) at 20 degree Celsius (20°C) shall be equipped with a pressure/vacuum conservation vents set at ± 0.2 kilopascals (kPa) (0.029 pound per square inch gauge (psig)) or greater except where more effective air pollution control is used and approved by the Director.
- 2) All tanks shall be equipped with submerged fill pipes or bottom fill pipes and these pipes shall be used to fill tanks.

**Monitoring/Recordkeeping:**

Combined total monthly and the consecutive 12-months VOC emissions calculations shall be maintained.

**Reporting:**

The permittee shall report to Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than fifteen days after the end of each month, if the records show that permittee exceeded the 12-month VOC emissions limitation.

<b>EU0160 – Paint Spray Booth in QC Lab (#2)</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/ Model #</b>	<b>2010 EIQ Reference #</b>
EU0160	Paint Spray Booth in QC Lab (#2) – Quality control lab Spray booth used for spraying panels. Equipped with a dry filter system to control emissions of particulate matter.	DeVibiss./ PCL886-125	EP16

**Permit Condition EU0160-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**St. Louis City APCP Construction Permit No. 95-01-014R**

**Emission Limitation:**

- 1) The permit applies to the process of spray painting not more than 200 gallons per twelve (12)-month rolling basis of paint, including topcoats, primers, and enamels, and not more than 300 gallons per twelve (12)-month rolling basis of cleaning solvent (2-Butanone) through a DeVilbiss Paint Spray Booth.
- 2) This limit of 500 gallons per twelve (12)-month rolling basis spraying products shall not be exceeded without written approval from this Division.

**Operational Limitation:**

- 1) This paint spray booth shall be operated and maintained in accordance with the manufacturer's operating instructions.
- 2) Containers of paints, coatings, thinners, cleaning solvents, and any other VOC or lead containing materials, shall be covered except during usage.
- 3) No visible emissions from the spray paint operations shall be emitted into the ambient air.
- 4) The permittee shall ensure that the dry filter is in place when spraying is being performed and that the device is being operated and maintained using good engineering practices.

**Monitoring/Recordkeeping:**

- 1) Adequate records shall be kept to verify operating hours and twelve (12)-month rolling records to paint (topcoats, primers, and enamels) and cleaning solvent throughput.
- 2) Records for the actual monthly usage of cleaning solvent shall be kept.
- 3) Estimates shall be provided to track monthly usage for paint, with the basis of: booth operating hours, number of paint sprays, average quantity of paint consumer per spray..
- 4) Maintenance records for control equipment, including filter changes shall be kept.

**Reporting:**

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 95-01-014R.

<b>EU0170 through EU0210 – Five Shading Air Mixers</b>			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0170 - EU0210	Five (5) shading air mixers (D/PM16, D/PM17, D/PM18, D/PM19, D/PM20) used to blend paint in portable tanks	Lightnin Mixers	EP2

**Permit Condition EU0170-001 through EU0210-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**St. Louis City APCP Construction Permit No. 98-01-005**

**Emission Limitation:**

The quantity of paint shaded under the mixers shall be limited to no more than 227,500 gallons on a twelve (12)-month rolling basis.

**Operational Limitation/Equipment Specification:**

- 1) Covers shall be installed on all open top tanks used for the production of non-waterbase coating products. These covers shall remain closed except when production, sampling, maintenance or inspection procedures require operator access.
- 2) Covers shall be installed on all tanks containing VOCs used for cleaning equipment. These covers shall remain closed except when operator access is required.

**Monitoring/Recordkeeping:**

- 1) Monthly records of quantities of shaded paint under these five (5) mixers shall be kept on a twelve (12)-month annual average basis.
- 2) Maintenance logs on the mixing equipment shall be kept.
- 3) Any upset or spill of more than 20 gallons of solvent shall be reported to this Division by telephone or fax as soon as practical.

**Reporting:**

The permittee shall report to Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 98-01-005.

<b>EU0270 – 2,000 Gallon Mixing Tank</b>			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0270	2,000 gallon mixing tank (Tank 9) (D/TKM 09) – A wall tank used for mixing paint	5HP Lightning	EP2

**Permit Condition EU0270-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**St. Louis City APCP Construction Permit No. 99-07-049SC**

**Emission Limitation:**

- 1) The throughput in the mixing tank No. 9 of typical VOC-based paint is limited to 208,000 gallons in any consecutive twelve (12)-month period.
- 2) The throughput of methyl ethyl ketone (MEK) cleaning solution is limited to 6,240 gallons in any consecutive twelve (12)-month period.
- 3) Total VOC emissions (including volatile HAPs) from mix tank No. 9 shall not exceed a limit of 14.4 tons per any consecutive twelve (12)-month period. Emissions of Total HAPs shall not exceed 6.5 tons per any consecutive twelve (12)-month period. Emissions of MEK shall not exceed 1.7 tons per any consecutive twelve (12)-month period.

**Operational Limitation:**

Containers shall be covered to minimize the VOC emissions. These covers shall remain closed, except when adding material, sampling, maintenance, or inspection procedures require operator access.

**Monitoring/Recordkeeping:**

- 1) Accurate records will be kept and will include: the amount and type of finished product, the amount of MEK used to clean the tank, the emissions of VOC and HAP pollutants, and the emissions of MEK from paints and cleaning solution.

- 2) Adequate records of raw materials, chemical usage, solvent recovery records shall be kept, and twelve (12)-month rolling totals of paint and cleaning solution throughput.

**Reporting:**

The permittee shall report to Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 99-07-049SC.

<b>EU0300 – Automotive/Industrial Paint Spray Booth (Lab #3 Mill Room)</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/ Model #</b>	<b>2010 EIQ Reference #</b>
EU0300	Automotive/Industrial Paint Spray Booth (Lab #3 Mill Room) – Spray booth used for spraying panels/parts for research and development purposes. Equipped with a dry filter system to control emissions of particulate matter.	Binks/ DWG No. 808652	EP10

<b>Permit Condition EU0300-001</b> <b>10 CSR 10-6.060 Construction Permits Required</b> <b>St. Louis City APCP Construction Permit No. 99-07-052</b>
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**Emission Limitation:**

- 1) The throughput of typical VOC-based paint shall be limited to 260 gallons sprayed through the booth in any consecutive twelve (12)-month period.
- 2) The throughput of cleaning solution shall be limited to 312 gallons sprayed through the booth in any consecutive twelve (12)-month period.
- 3) The rate of PM<sub>10</sub> emissions shall be limited to 0.46 pounds per hour in any one (1)-hour period.
- 4) Paint overspray shall pass through a filter with a control efficiency of ninety-seven percent (97%) or better for PM<sub>10</sub> and that the dry filter system is being operated and maintained using good engineering practices.

**Monitoring:**

Visual inspection for any deficiencies or damage to this control device shall be performed on a monthly basis. If any deficiencies or damage has been accessed, then spraying operations shall cease until proper maintenance or replacement of the control device has occurred.

**Recordkeeping:**

Accurate records of the following shall be kept on a monthly basis:

- 1) Accurate records of the twelve (12)-month rolling totals of paint throughput and cleaning solvent throughput;
- 2) PM<sub>10</sub> emissions; and
- 3) Visual inspection and/or maintenance performed on the control device.

**Reporting:**

The permittee shall report Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 99-07-052.

<b>EU0320 – Premier Submersible Mill</b>			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0320	Premier Submersible Mill – Used to blend paint and achieve desired pigment size.	Premier/ PSM 400	EP2

**Permit Condition EU0320-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**St. Louis City APCP Construction Permit No. 00-07-036**

**Emission Limitation:**

- 1) The throughput in the mill of typical VOC-based raw materials and/or shading paints is limited to 110,000 gallon in any consecutive twelve (12)-month period.
- 2) The throughput of MEK cleaning solution in the mill is limited to 21,990 gallons in any consecutive twelve (12)-month period.

**Operational Limitation:**

Containers shall be covered to minimize the VOC emissions. These covers shall remain closed, except when adding material, sampling, maintenance, or inspection procedures require operator access.

**Monitoring/Recordkeeping:**

- 1) Accurate, easily understood records of the following shall be kept:
  - a) Amount and type of finished product;
  - b) Material throughput;
  - c) MEK cleaning solution throughput;
  - d) Emissions of VOC and HAP pollutants; and
  - e) Emissions of MEK from paints and cleaning solution.
- 2) Recordkeeping requirements can be consolidated onto one record.

**Reporting:**

- 1) The permittee shall report Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 00-07-036.
- 2) Spills of 20 gallons or greater shall be reported to the Air Pollution Control Program’s Enforcement Section within a reasonable time, not to exceed 5:00 p.m. the following business day.

<b>EU0330 through EU0350 – Three Premier Submersible Mills</b>			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0330 – EU0350	Three Premier Submersible Mills – Used to blend paint and achieve desired pigment size.	Premier/PSM 300, PSM 200 & PSM 100	EP2

**Permit Condition EU0330-001 through EU0350-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**St. Louis City APCP Construction Permit No. 01-01-052**

**Emission Limitation:**

Each premier submersible mill is limited to emissions of no more than the following in any consecutive twelve (12)-month period;

- 1) 2.90 tons of total VOC;
- 2) 1.41 tons of HAPs; and
- 3) 0.45 ton of MEK.

**Operational Limitation:**

Containers shall be covered to minimize the VOC emissions. These covers shall remain closed, except when adding material, sampling, maintenance, or inspection procedures require operator access.

**Monitoring/Recordkeeping:**

- 1) Accurate, easily understood records of the following shall be kept:
  - a) Amount and type of finished product;
  - b) Material throughput;
  - c) MEK cleaning solution throughput;
  - d) Emissions of VOC and HAP pollutants; and
  - e) Emissions of MEK from paints and cleaning solution.
- 2) Recordkeeping requirements can be consolidated onto one record.

**Reporting:**

- 1) The permittee shall report to Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 01-01-052.
- 2) Spills of 20 gallons or greater shall be reported to the Air Pollution Control Program's Enforcement Section within a reasonable time, not to exceed 5:00 p.m. the following business day.

<b>EU0360 – Fairing Compound Mixer</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/ Model #</b>	<b>2010 EIQ Reference #</b>
EU0360	Fairing Compound Mixer – Mixer used to make fairing compound and occasionally used to blend paint.	Hockmeyer	EP2

<b>Permit Condition EU0360-001</b> <b>10 CSR 10-6.060 Construction Permits Required</b> <b>St. Louis City APCP Construction Permit No. 01-05-012</b>
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**Emission Limitation:**

- 1) VOC emissions from the Hockmeyer fairing compound mixer shall not exceed 1.28 tons in any consecutive twelve (12)-month period.
- 2) HAPs emissions from the Hockmeyer fairing compound mixer shall not exceed 0.19 ton in any consecutive twelve (12)-month period.

**Operational Limitation:**

Containers shall be covered to minimize the VOC emissions. These covers shall remain closed, except when adding material, sampling, maintenance, or inspection procedures require operator access.

**Monitoring/Recordkeeping:**

- 1) Monthly records of VOC and HAPs emissions and throughput for the Hockmeyer fairing compound mixer shall be kept for every consecutive twelve (12)-month period.
- 2) Recordkeeping requirements can be consolidated onto one record.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 01-05-012.
- 2) Spills of 20 gallons or greater shall be reported to the Air Pollution Control Program's Enforcement Section within a reasonable time, not to exceed 5:00 p.m. the following business day.

<b>EU0370 – Hockmeyer Paddle Mixer (C/PM1)</b>			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0370	Hockmeyer Paddle Mixer – Mixer used to blend paint.	Hockmeyer/ 25001	EP2

<p style="text-align: center;"><b>Permit Condition EU0370-001</b> <b>10 CSR 10-6.060 Construction Permits Required</b> <b>St. Louis City APCP Construction Permit No. 02-02-010</b></p>
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**Emission Limitation:**

- 1) VOC emissions from the Hockmeyer mixer shall not exceed 3.86 tons in any consecutive twelve (12)-month period.
- 2) HAPs emissions from the Hockmeyer mixer shall not exceed 1.70 tons in any consecutive twelve (12)-month period.

**Operational Limitation:**

Containers shall be covered to minimize the VOC emissions. These covers shall remain closed, except when adding material, sampling, maintenance, or inspection procedures require operator access.

**Monitoring/Recordkeeping:**

- 1) Monthly records of VOC and HAPs emissions and throughput for the Hockmeyer mixer shall be kept for every consecutive twelve (12)-month period.
- 2) Recordkeeping requirements can be consolidated onto one record.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 02-02-010.
- 2) Spills of 20 gallons or greater shall be reported to the Air Pollution Control Program's Enforcement Section within a reasonable time, not to exceed 5:00 p.m. the following business day.

**EU0380 – Paddle Mixer (CP/M2)**

Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0380	Paddle Mixer – Mixer used to blend paint.	Hockmeyer	EP2

**Permit Condition EU0380-001**

**10 CSR 10-6.060 Construction Permits Required  
 St. Louis City APCP Construction Permit No. 03-06-010**

**Emission Limitation:**

- VOC emissions from the paddle mixer shall not exceed 4.86 tons in any consecutive twelve (12)-month period.
- HAPs emissions from the paddle mixer shall not exceed 2.13 tons in any consecutive twelve (12)-month period.

**Operational Limitation:**

Containers shall be covered to minimize the VOC emissions. These covers shall remain closed, except when adding material, sampling, maintenance, or inspection procedures require operator access.

**Monitoring/Recordkeeping:**

- The permittee shall maintain monthly records of VOC and HAPs emissions, including the calculated totals for every consecutive twelve (12)-month period. Due to the diversity of paint products used for the batch operation, emission calculations for VOCs and HAPs shall be calculated on a “product series” basis
- Recordkeeping requirements can be consolidated onto one record.

**Reporting:**

The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 03-06-010.

**EU0390 – Expansion Area Spray Booth**

Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0390	Expansion Area Spray Booth – Spray booth used for spraying panels/parts for R&D purposes. Equipped with a dry filter system to control emissions of particulate matter.	Global Finishing Solutions/RFD-87-S	EP7

**Permit Condition EU0390-001**

**10 CSR 10-6.060 Construction Permits Required  
 St. Louis City APCP Construction Permit No. 04-01-001**

**Emission Limitation:**

VOC emissions from the spray booth mixer shall not exceed 1.0 ton in any consecutive twelve (12)-month period.

**Operational Limitation:**

- 1) Visual inspection for any deficiencies or damages to the control device shall be performed on a monthly basis. If any deficiencies or damages have been accessed, then spraying operations shall cease until proper maintenance or replacement of the control device has occurred.
- 2) The permittee shall ensure that the dry filter is in place when spraying is being performed and that the device is being operated and maintained using good engineering practices.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain records of dry filter inspection, maintenance activities, and corrective maintenance actions taken by the permittee to ensure optimal performance of the filter.
- 2) Monthly records of VOC emissions from the paint booth shall be maintained on a consecutive twelve (12)-month basis.

**Reporting:**

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 04-01-001.

<b>EU0400 – Dust Collectors</b>		
<b>Emission Unit</b>	<b>Description</b>	<b>2010 EIQ Reference #</b>
EU0400	Dust Collectors (D/DC1, E/DC1, N/DC1, SB/DC1) – Used to capture excess pigment while dumping pigment.	EP2

<p align="center"><b>Permit Condition EU0400-001</b></p> <p align="center"><b>10 CSR 10-6.400 Restriction of emissions of Particulate Matter from Industrial Processes</b></p>
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**Emission Limitation:**

The permittee shall not allow, or permit the emission of particulate matter from the dust collectors in excess of 0.3 grain per standard cubic foot of exhaust gases.

**Monitoring:**

Baghouse operation and maintenance – to ensure proper function, the following periodic monitoring shall be performed:

- 1) Check and document the pressure drop across the filter element at least bi-monthly. The pressure drop across the filter shall be maintained within the range of 0.2 to 6.0 inches of water. If the pressure drop falls out of the normal operating range, corrective action shall be taken within eight (8) hours to return the pressure drop to normal.
- 2) Check the cleaning sequence of the baghouse semi-annually.
- 3) Thoroughly inspect bags for leaks and wear semi-annually.
- 4) Inspect every six (6) months all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.
- 5) If leaks or abnormal conditions are detected the appropriate measures for remediation shall be implemented within eight (8) hours. Bag replacement should be documented. Maintain a written record of the inspection and any action resulting from the inspection. All instruments and control equipment shall be calibrated, maintained, and operated according to the manufacture's specifications.

**Recordkeeping:**

The permittee shall maintain records to verify compliance with the baghouse monitoring. These records shall include bi-monthly filter pressure drop indicator readings, all inspections and corrective actions, and all dates of filter replacement. (See Attachments D and E)

**Reporting**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than fifteen (15) days after the permittee determined that the unit(s) deviated from the normal operating pressure drop range.
- 2) Reports of any deviations from monitoring other than the operating pressure drop range, Recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

**Permit Condition EU0400-002**

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

**Emission Limitation:**

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

**Monitoring:**

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Observations must be made once per month. If a violation is noted, then
  - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

**Recordkeeping:**

- 1) The permittee shall maintain records of all observation results (See Attachment F), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and

- c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment G)

**Reporting:**

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

<b>EU0430 – Tank Washer</b>			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0430	Tank Washer – Stationary tank washer that is used to wash portable tanks	Hockmeyer Equipment/CMX100	EP15

**Permit Condition EU0430-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**St. Louis City APCP Construction Permit No. 05-08-005**

**Emission Limitation:**

- 1) The permittee shall not emit more than 20 tons of VOC from the tank washing operation in any consecutive 12-month period;
- 2) The permittee shall not emit more than 11 tons of combined HAPs from the tank washing operation in any consecutive 12-month period; and
- 3) The permittee shall emit less than ten tons of any individual HAP from the tank washing operation in any consecutive 12-month period.

**Monitoring/Recordkeeping:**

The permittee shall keep monthly records of total VOC, total HAPs and individual HAP emissions, including a calculated total for every consecutive twelve (12)-month period.

**Reporting:**

The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 05-08-005.

**EU0440 – Isocyanate Mixers**

Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0440	Isocyanate Mixers – Two (2) 250 gallon Lighting mixers/tanks used to make isocyanate.	Lightnin/ R05384136-1 & R03379206-01	EP2

**Permit Condition EU0440-001**

**City of St. Louis Source Registration Permit No. SR06.025<sup>1</sup>**

**Emission Limitation:**

The permittee shall not emit more than 2.08 tons of VOC from the isocyanate mixers in any consecutive 12-month period;

**Monitoring/Recordkeeping:**

The permittee shall keep monthly records of VOC emissions, including a calculated total for every consecutive twelve (12)-month period.

**Reporting:**

The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Source Registration Permit No. SR06.025.

**EU0450 – PSM700 Submersible Mill (D/PSM700)**

Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0450	PSM700 Submersible Mill Used to blend paint and achieve desired pigment size	Premier/PSM700	EP2

**Permit Condition EU0450-001**

**10 CSR 10-6.060 Construction Permits Required  
 St. Louis City APCP Construction Permit No. 06-05-009**

**Emission Limitation:**

Each Premier submersible mill is limited to emissions of no more than the following in any consecutive 12-month period:

- 1) 7.02 tons of total VOCs;
- 2) 1.11 tons of total HAPs; and
- 3) Screening Model Action Levels (SMAL):

<sup>1</sup> St. Louis City Source Registration Permit is a local agency requirement which is enforceable by the City of St. Louis only.

Chemical	Level
Vinyl Acetate.....	1.0 ton
Carbon Tetrachloride.....	1.0 ton
Ethyl Acrylate.....	1.0 ton
Hexamethylene, 1-6 diisocyanate.....	0.02 ton
Nickel Compounds.....	1.0 ton
Phenol.....	0.1 ton
Styrene.....	1.0 ton
Acetophenone.....	1.0 ton
Diphenylmethane diisocyanate .....	0.1 ton

**Monitoring/Recordkeeping:**

The permittee shall keep monthly records of total VOC and total HAPs emissions, including a calculated total for every consecutive twelve (12)-month period of time.

**Reporting:**

The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 06-05-009.

<b>EU0460 – Safety Kleen Parts Washers</b>			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0460	Safety Kleen Parts Washers	Safety Kleen/ Model 81.8, Serial # 2149	EP-19

<p><b>Permit Condition EU0460-001</b></p> <p><b>10 CSR 10-5.300 Control of Emissions from Solvent Cleaning</b></p>
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**Emission Limitation:**

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

**Operational Limitation/Equipment Specification:**

- 1) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
- 2) When one or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):

- a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8 degrees Celsius (37.8°C) (100 degrees Fahrenheit (100°F));
- b) The solvent is agitated; or
- c) The solvent is heated.
- 3) Each cold cleaner shall have a internal drainage facility so that parts are enclosed under the cover while draining.
- 4) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
- 5) Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
- 6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
- 7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or is heated above 48.9°C (120°F), must use one of the following control devices:
  - a) A freeboard ratio of at least 0.75;
  - b) Water cover (solvent must be insoluble in and heavier than water); or
  - c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65 percent. These control systems must receive approval from the Director and EPA prior to their use.
- 8) Each cold cleaner shall be operated as follows:
  - a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
  - b) Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining, the parts shall be positioned so that the solvent drains directly back to the cold cleaner.
  - c) Whenever a cold cleaner fails to perform within the rule operating requirements, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the rule operating requirements.
  - d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down until the leaks are repaired.
  - e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the Director and EPA:
    - i) Reduction of the waste material to less than 20 percent VOC solvent by distillation and proper disposal of the still bottom waste; or
    - ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the Director and EPA.
  - f) Waste solvent shall be stored in covered containers only.
- 9) Operators must be trained as follows:
  - a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process to operate this equipment;
  - b) The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operators; and

- c) A procedural review shall be given to all solvent metal cleaning equipment operators at least once each 12 months.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment J):
  - a) Name and address of the solvent supplier.
  - b) Date of purchase.
  - c) Type of solvent purchased.
  - d) Vapor pressure of solvent in mm Hg at 20°C or 68°F.
- 2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (See Attachment H) The record also shall include maintenance and repair logs that occurred on the degreaser (Attachment 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 this rule.
- 3) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment K)
- 4) All records shall be retained for five years and be available to the Director upon request.

**Reporting:**

Reports of any deviations from monitoring, Recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

<b>EU0470 through EU0510 – Five (5) Bank Mixers</b>			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0470 – EU0510	Five (5) Bank of Mixers (D/PM11, D/PM12, D/PM13, D/PM14, D/PM15) – Mixers used to blend paint in portable tanks	Leeson Electric Co./ DVJ182TTGS4033ARL	EP2

**Permit Condition EU0470-001 through EU510-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**St. Louis City APCP Construction Permit No. 07-02-001**

**Emission Limitation:**

- 1) The permittee shall not exceed 40 tons of VOC from the mixers in any consecutive 12-month period;
- 2) The permittee shall not exceed the Maximum Design Capacity (MDC) of 9,000 gallons of paint per day for the five (5) Bank mixers.
- 3) The permittee shall not emit individual HAPs in excess of the Screen Model Action Level (SMAL) as listed in Table 2 or Table 6 of Construction Permit No. 07-02-001.

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep monthly records of total VOC emissions, including a calculated total for every consecutive twelve (12)-month period of time.

- 2) The permittee shall keep the daily records of the throughput of the mixers in order to ensure that the MDC reported in the Construction Permit Application (Permit No. 07-02-001) is not exceed.

**Reporting:**

- 1) The permittee shall notify the Air Pollution Control Program in writing within 15 days of emissions of any HAPs that are not listed in Table 2 or Table 6 of Construction Permit No. 07-02-001.
- 2) The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 07-02-001.

<b>EU0520 – Horizontal Mill in Small Batch</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/ Model #</b>	<b>2010 EIQ Reference #</b>
EU0520	Horizontal Mill in Small Batch (SB/HM2)– For paint or coating manufacture.	Dyno	EP2

**Permit Condition EU0520-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**St. Louis City APCP Construction Permit No. 07-02-001**

**Emission Limitation:**

- 1) The permittee shall not process more than four (4) 15-gallon batches through the mill each month.
- 2) The permittee shall not process more than one (1) 15-gallon batch through the mill in any four (4) hour period.
- 3) The HAP emissions rate from the horizontal mill shall be less than 0.5 lb/hr.

**Operational Limitation:**

The horizontal mill and any containers used in the handling of materials and the processing of batches shall be equipped with a cover and shall be kept closed when not in use.

**Monitoring/Recordkeeping:**

The permittee shall keep the following records:

- 1) Number of batches processed through the horizontal mill each month, including date, hours and batch size;
- 2) HAP content of each batch processed through the mill; and
- 3) Copies of the Material Safety Data Sheets (MSDS) for the finished product and for all raw materials used in each product processed through the mill.

**Reporting:**

The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 07-02-001.

<b>EU0530 – Drum/Container Washing Process</b>			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0530	Drum/Container Washing Process – Process of Washing drums and containers with reclaim solvent.	N/A	EP19

**Permit Condition EU0530-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**St. Louis City APCP Construction Permit No. 09-03-008**

**Emission Limitation:**

Hazardous Air Pollutant (HAP) content of the Reclaim Solvent used in the drum and container washing processes shall not exceed 30 percent by weight.

**Operational Limitation:**

- 1) The permittee shall utilize bungholes for filling and emptying solvent during the drum cleaning process.
- 2) Reclaim solvent, as described in the application and MSDS, shall be the only regulated material (VOC or HAP) the permittee shall utilize in the drum and container washing processes.
- 3) All containers of VOC or HAP material shall be kept closed at all times except during transfer operations.

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep monthly records of the number of drums washed and the number of drums of containers washed. If no washing is performed during any month, a “0” (zero) shall be entered in the record.
- 2) The permittee shall maintain Material Safety Data Sheets (MSDS) for the Reclaim Solvent utilized in the washing operations. The MSDS shall clearly indicate the percent by weight of each HAP constituent in the Reclaim Solvent.
- 3) The permittee shall record emissions monthly as follows:
  - a) Calculate and record the emissions of VOC and HAP from the drum and container washing operation for each month. (See Attachment A)
  - b) Calculations shall be done using the emission factors determined during trials.
  - c) There shall be no change of emission factor unless approved by the Air Pollution Control Program.

**Reporting:**

The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by Construction Permit No. 09-03-008.

## 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 is only an excerpt from the regulation or code, and is provided for summary purposes only.

### **City of St. Louis Ordinance 68657, §16 Open Burning Restrictions**

- 1) No person shall cause, suffer, allow or permit the open burning of refuse.
- 2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
- 3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
- 4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
- 5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether

the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.

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

#### **10 CSR 10-6.060 Construction Permits Required**

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

#### **10 CSR 10-6.065 Operating Permits**

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

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

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

#### **10 CSR 10-6.100 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 Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the Director.
- 2) The permittee may be required by the Director to file additional reports.

- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 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.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the Director. The reports shall be submitted to the Director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

#### **10 CSR 10-6.150 Circumvention**

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

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

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

- c) Application of dust-free surfaces;
- d) Application of water; and
- e) Planting and maintenance of vegetative ground cover.

#### **10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

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

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

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

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

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

#### **10 CSR 10-6.165 Restriction of Emission of Odors**

**This requirement is not federally enforceable.**

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

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

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.

- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

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

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

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

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

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

#### **10 CSR 10-6.280 Compliance Monitoring Usage**

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

## V. General Permit Requirements

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

### **10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration**

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

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

- 1) Recordkeeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, Recordkeeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
    - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause**

This permit may be reopened for cause if:

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

**10 CSR 10-6.065 §(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 G - Method 9 Opacity Emissions Observation  
 10 CSR 10-6.220 Compliance Demonstration**

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

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

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

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

Was the emission unit in compliance at the time of evaluation? \_\_\_\_\_  
 YES NO \_\_\_\_\_ Signature of Observer









# STATEMENT OF BASIS

## Voluntary Limitations

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

## Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received May 3, 2010;
- 2) 2010 Emissions Inventory Questionnaire, received May 2, 2011; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) City of St Louis Air Pollution Control Program Construction Permits and Source Registration Permits:

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Permit Number	Description
1991 SR	Water Wash Spray Booth
CP 94-06-043	Never Installed
CP 95-01-014R	Paint Spray Booth and Spraymation automated spray machine in QC Lab (#2) (EP16)
CP 98-01-005	5 Shading Air Mixers
CP 98-08-055 and CP 98-08-055A	15 Above Ground Storage Tanks (Three (3) tanks with 5 compartments in each tank)
CP 99-07-049SC	2,000-gallon mixing tank (Tank 9) (D/TKM 09)
CP 99-07-051SC	Sand Mill Installation
CP 99-07-052	Automotive / Industrial Paint Spray Booth "Lab 3", "Mill Room Spray Booth", EP-10
CP 00-07-036	Premier Submersible Mill (PSM 400)
CP 01-01-052	Three Premier Submersible Mills (PSM)
CP 01-05-012	Modification to Fairing Compound Mixer
CP 02-02-010	Modification to Mixer in E-Building (Hockmeyer paddle mixer E/D8)
CP 03-06-010	New Hockmeyer Paddle Mixer "D"
CP 04-01-001	Lab Paint Booth (Global Finishing Solutions down draft, EP-7)

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<b>Permit Number</b>	<b>Description</b>
CP 05-08-005	Hockmeyer CMX-100 Tank Washer
SR06.025	Two Lightning Mixers
SR06.032	Cold Cleaner (80 gallon)
CP 06-05-009	PSM 700 Submersible Mill
CP 07-02-001	Installation of Five (5) Production Mixers
CP 08-10-017	Amends Permit 07-02-001
SR08.047	Horizontal Mill in Small Batch Department
CP 09-03-008	New Container and Drum Washing Operation

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

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

None

**Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

1) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule exempts combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels.

All combustion equipment at the installation uses pipeline grade natural gas and is exempt from the requirements of this rule.

2) St. Louis City Ordinances Nos. 64749, 65108, 65488, 65442 and 65645

These ordinances were reviewed and considered at the time the application for this permit was submitted. Since that time, these ordinances have been repealed and replaced with St. Louis City Ordinance No. 68657. The only section of Ordinance 65645 that corresponds to a rescinded ordinance included in the State SIP and therefore federally enforceable is Section 16 - Open Burning Restrictions. This section of the new ordinance is the only section included in the operating permit at this time.

**Construction Permit Revisions**

- 1) The construction permits issued to U.S. Paint by the City of St. Louis APCP required the installation to report emissions yearly on the Emissions Inventory Questionnaire. Since the emission reporting [10 CSR 10-6.110, *Submission of Emission Data, Emission Fees and Process Information*] is the requirements of this Intermediate permit and included in the core permit requirements section of this

permit, the yearly emissions reporting conditions of the construction permits are not included in the operating permit.

2) 10 CSR 10-6.060, *Construction Permits Required*

When a Construction Permit is incorporated into the Operating Permit, all aspects of the Construction Permit relating to emissions are to be maintained for an installation to be in compliance. According to 10 CSR 10-6.060, *Construction Permits Required* the Construction Permit consists of both the issued permit and Construction Permit Application.

10 CSR 10-6.060 (6)(E)3. – “Any owner or operator who constructs, modifies or operates an installation not in accordance with the application submitted and the permit issued, including any terms and conditions made a part of the permit, or any owner or operator of an installation who commences construction or modification after May 13, 1982, without meeting the requirements of this rule, is in violation of this rule;”

Any installation that does not comply with the issued permit and Construction Permit Application as it relates to emissions would be considered to be in violation of 10 CSR 10-6.060.

The Construction Permit Application consists of numerous parameters that are not included in either the Construction Permit or the Operating Permit. Some examples of the criteria necessary for the application are site information; descriptions; plans; control efficiencies; flow parameters; design specifications; and drawings showing the design of the installation, the nature and amount of emission of each pollutant, and the manner in which emission units will be operated and controlled. These values submitted in the Construction Permit Application define the criteria the regulatory agencies use to evaluate potential emissions and determine the ambient air quality of the surrounding area. It is essential the installation operate and construct the emission units according to the criteria related to emissions in the Construction Permit Application, since the criteria are the basis behind the limitations established in the Construction Permit. If any of the parameters relating to emissions should change, the installation would be required to request and obtain a modification to their Construction Permit.

While an installation must adhere to their Construction Permit Application, it is not necessary for the installation to certify and monitor each application parameter to show compliance. The installation is only required to monitor those parameters defined in specific state or federal requirements or identified as Special Conditions in the Construction Permit. When construction permits are placed in Plant-wide and Emission Unit Permit Conditions in the Operating Permit, the installation is required to certify compliance with the parameters (monitoring, performance testing, Recordkeeping and reporting) identified in the Plant-wide and Emission Unit Permit Conditions of the Operating Permit. However, the various parameters detailed in the Construction Permit Application are still applicable to the installation, even though the criteria are not specifically listed in the Operating Permit.

**New Source Performance Standards (NSPS) Applicability**

There are no NSPS standards that are currently applicable to this installation.

### **Maximum Achievable Control Technology (MACT) Applicability**

1) 40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

The cleaning solvents covered by the MACT standard are solvents 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.

The installation operates cold cleaners that use non halogenated solvent as the cleaning solvent. Therefore, the installation is not subject to 40 CFR Part 63, Subpart T.

2) 40 CFR Part 63, Subpart HHHHHH - *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

U.S. Paint is a coating manufacturing facility. U.S. Paint makes paint for various different substrates and uses. Some of U.S. Paint's customers may apply the coatings to metal parts and/or to plastic parts. During the development (Research and Development activities (R&D)) of coatings, U.S. Paint may paint 4x6 inch metal and/or plastic panels and conduct various tests on the panels. In addition during the production process, U.S. Paint's Quality Control (QC) lab may spray metal and/or plastic 4x6 inch panels to verify that the product manufactured meets the required specifications. These activities are exempt from this rule per §63.1169 (d) (4) and (5).

### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

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

This regulation has been included in the operating permit because it applies to any demolition or renovation (as outlined in 40 CFR 61.145) of buildings containing asbestos at the installation.

### **Other Regulatory Determinations**

1) 10 CSR 10-6.400, *Restriction of Emission Of Particulate Matter From Industrial Processes*

a) R&D, Small Batch, and QC lab coating operations:

According to paragraph (1)(B)14 of this rule, coating operations equipped with a control system designed to control at least 95% of the particulate overspray are exempt from the requirements of this rule. All the R&D, Small Batch, and QC lab coating operations are equipped with dry filters with particulate matter control efficiencies greater than 95 percent. Therefore, these units are not subject to this rule..

b) According to 10 CSR 10-6.400(1)(B)7., fugitive sources are not subject to this rule.

The following fugitive sources and the units listed in the "Emission Units Without Limitations" section are not subject to this rule.

Emission Unit #	EIQ Reference #	Description of Emission Unit
EU0170 - EU0210	EP2	Five (5) Shading Air Mixers (D/ PM16, D/PM17, D/PM18, D/PM19, and D/PM20)
EU0270		2000 Gallon Mixing Tank (Tank 9). (D/TKM#9)
EU0320		Premier Submersible Mill
EU0330 – EU0350		Three (3) Premier Submersible Mills
EU0360		Fairing Compound Mixer
EU0370		Hockmeyer Paddle Mixer
EU0380		Paddle Mixer
EU0440		Isocyanate Mixers
EU0450		PSM700 Submersible Mill
EU0470 – U0510		Five (5) Bank of Mixers (D/PM11, D/PM12, D/PM13, D/PM14, D/PM15)
EU0520		Horizontal Mill in Small Batch

- c) The dust collectors (EU0400) in the mixing area which are used to capture excess pigment while dumping pigment are the only activities that are subject to this rule.

For the purpose of determining the maximum allowable particulate matter emissions from EU0400, the following calculations were performed.

Maximum hourly design rate = 2.5 lbs/hr

Exhaust stack temperature = 68°F

Exhaust flow rate = 2,500 ft<sup>3</sup>/min

SCFM =  $[2,500 \text{ ft}^3/\text{min} \times 528^\circ\text{R}] \div [(68^\circ\text{F} + 468)^\circ\text{R}] = 2,500 \text{ ft}^3/\text{min}$

PM concentration =  $[2.5 \text{ lbs/hr} \times 7,000 \text{ gr/lb}] \div [2,500 \text{ ft}^3/\text{min} \times 60 \text{ min/hr}] = 0.11 \text{ gr/scf}$

It is highly unlikely that the 0.3 grain per standard cubic foot limit of this rule will be exceeded with the control device operating properly. As the calculations shows above, the values are well below the allowable emission rate. Therefore, the monitoring and recordkeeping will include periodic monitoring of the control device.

2) 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*

As stated above U.S. Paint is a coating manufacturing facility. All the coating operations at the facility is for research/development and for quality control purposes. These activities are exempt from this rule per paragraph (1)(D)4 of 10 CSR 10-5.330.

3) 10-5.540, *Control of Emissions From Batch Process Operations*

This rule is applicable to all batch process operations that have the potential to emit equal to or greater than 100 tons per year of VOCs at sources identified by any of the following four (4)-digit standard industrial classification (SIC) codes, as defined in the 1987 edition of the Federal Standard Industrial Classification Manual: SIC 2821, 2833, 2834, 2861, 2865, 2869, and 2879.

This rule is SIC code specific. US Paint's SIC code is 2851. It is not either one of the SIC codes

specified in the rule or a source with the potential to emit equal to or greater than 100 tons per year of VOCs. Therefore U.S. Paint is not subject to this rule.

- 4) 10 CSR 10-5.390, *Control of Emissions From Manufacture of Paints, Varnishes, Lacquers, Enamels and Other Allied Surface Coating Products*  
U.S. Paint does not have any varnish cooking operations or polymerization operations of synthetic varnish or resins, therefore all sections pertaining to these operations were excluded from Permit Condition PW001.
- 5) The units listed in the “Emission Units Without Limitations” section of this permit either have no applicable regulations associated with them or are considered insignificant activities. Those units include, but are not limited to, distillation unit process miscellaneous above ground storage tanks with storage capacities less than 3,000 gallons, paint spray booths with dry filters, miscellaneous small batch equipment and all natural gas-fired combustion units with a maximum heat input of less than ten (10) MMBtu/hr that emit only products of combustion.

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

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

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

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

Prepared by:

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Berhanu A. Getahun  
Environmental Engineer

CERTIFIED MAIL: 70093410000190188643  
RETURN RECEIPT REQUESTED

Mr. John J. Duchardt  
U.S. Paint Corporation  
831 South 21st Street  
St. Louis, MO 63103

Re: U.S. Paint Corporation, 510-0097  
Permit Number: **OP2011-063**

Dear Mr. Duchardt

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.

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) 416-2960. 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/bgk

Enclosures

c: St. Louis Regional Office  
PAMS File: 2010-05-002