



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2012-023
Expiration Date: JUN 03 2017
Installation ID: 175-0061
Project Number: 2011-05-056

Installation Name and Address

Wilson Trailer Sales, Inc.
1600 Route DD
Moberly, MO 65270
Randolph County

Parent Company's Name and Address

Wilson Trailer Company
4400 South Lewis Blvd.
Sioux City, IA 51106

Installation Description:

Wilson Trailer Sales, Inc. operates a truck trailer manufacturing facility. Truck trailers are manufactured from metal sheets and bars by washing, cutting, and welding. The finished trailers are painted in a spray booth, followed by baking of the coating in natural gas heated furnaces. Operations include metal cutting, welding, metal parts washing prior to painting, spray painting, and baking of the coating. Cleaning solvent is used to clean the spray guns. Natural gas fired heaters are used for building heat, furnaces, and a water evaporator. The facility is subject to 40 CFR Part 63 Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

JUN 04 2012

Effective Date

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT LIMITATIONS.....	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
PERMIT CONDITION PW001	5
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A)-Voluntary Limitation(s)	5
PERMIT CONDITION PW002	5
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	5
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	7
SPRAY BOOTH AND SPRAY GUN CLEANING	7
PERMIT CONDITION (EU01 and EU03)-001	7
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations	7
40 CFR Part 63, Subpart A General Provisions, and	7
40 CFR Part 63, Subpart HHHHHH– National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources	7
PERMIT CONDITION EU01-002.....	10
10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants.....	10
IV. CORE PERMIT REQUIREMENTS	12
V. GENERAL PERMIT REQUIREMENTS.....	20
VI. ATTACHMENTS	24
ATTACHMENT A.....	25
ATTACHMENT B	26
ATTACHMENT C	27
ATTACHMENT D.....	28
ATTACHMENT E	29
ATTACHMENT F	30
ATTACHMENT G.....	31

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Wilson Trailer Sales, Inc. operates a truck trailer manufacturing facility. Truck trailers are manufactured from metal sheets and bars by washing, cutting, and welding. The finished trailers are painted in a spray booth, followed by baking of the coating in natural gas heated furnaces. Operations include metal cutting, welding, metal parts washing prior to painting, spray painting, and baking of the coating. Cleaning solvent is used to clean the spray guns. Natural gas fired heaters are used for building heat, furnaces, and a water evaporator. The facility is subject to 40 CFR Part 63 Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.20	0.15	0.35	0.22	0.49
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.20	0.15	0.35	0.22	0.49
Sulfur Oxides (SO _x)	0.00	0.00	0.0016	0.0016	0.0016
Nitrogen Oxides (NO _x)	0.00	0.00	0.25	0.26	0.26
Volatile Organic Compounds(VOC)	10.49	13.02	14.18	2.34	25.11
Carbon Monoxide (CO)	0.00	0.00	0.21	0.22	0.21
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	1.96	3.16	3.41	0.12	4.88
Ammonia (NH ₃)	0.00	0.00	0.008	0.0084	0.0082

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
EU01	Spray booth used for painting finished trailers
EU02	Spray gun cleaner

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Parts Cleaning

Power Washer

Welding

2 Paint Booth Furnaces, 3.81 MMBtu/hr each

2 Wash Booth Furnaces 2.25 MMBtu/hr each

Cure Booth Furnace, 4.51 MMBtu/hr

Lunch Room Furnace, 0.20 MMBtu/hr

Training Room Furnace, 0.04 MMBtu/hr

Conference Room Furnace, 0.04 MMBtu/hr

Main Office Furnace, 0.04 MMBtu/hr

2 Weather Rite Furnace, 3.46 MMBtu/hr each

3 CoRay Vac Furnaces, 0.10 MMBtu/hr each

Wash Booth Furnace, 0.545 MMBtu/hr

0.365 MMBtu/hr Evaporator Burner and Evaporator Tank

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 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A)-Voluntary Limitation(s)

Emission Limitation

The permittee shall emit less than 10.0 tons of any individual hazardous air pollutant (HAP) and less than 25.0 tons of any combination of HAPs in any consecutive twelve month period.

Monitoring/Recordkeeping

1. The permittee shall maintain an accurate record of HAP emissions. The permittee shall record the monthly HAP emissions with a consecutive 12-month total. Attachments A and B or their equivalents shall be used to demonstrate compliance with the emission limit.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

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 end of the month, if the consecutive 12-month total records show that the source exceeded the emission limitation of less than 10.0 tons of any individual HAP or 25.0 tons of any combination of HAPs.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by Section IV of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation

The permittee shall discharge into the atmosphere from the entire installation less than 100.0 tons of volatile organic compounds (VOC) during any consecutive 12-month period.

Monitoring/Recordkeeping

1. The permittee shall maintain an accurate record of VOC emissions. The permittee shall record the monthly VOC emissions with a consecutive 12-month total. Attachment C or an equivalent form shall be used to demonstrate compliance with the emission limit.
2. These records shall be made immediately available to any Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

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 end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of less than 100.0 tons of VOC emissions.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by Section IV of this permit.

III. Emission Unit Specific Emission Limitations

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

Spray Booth and Spray Gun Cleaning		
Emission Unit	Description	Manufacturer/Model #
EU01	Spray booth used for painting finished trailers	SLI/CPBC 701612
EU03	Spray Gun Cleaner	SLI/ CPBC 701612

PERMIT CONDITION (EU01 and EU03)-001

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart A General Provisions, and
40 CFR Part 63, Subpart HHHHHH– National Emission Standards for Hazardous Air Pollutants:
Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

General Compliance Requirements

1. All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in Paragraph (f) of §63.11173. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in Paragraph (f) of §63.11173. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of §63.11173(e)(1). [§63.11173(e)(1)]
2. All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of Paragraphs (e)(2)(i) and (e)(2)(ii) of §63.11173. [§63.11173(e)(2)]
 - a) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992” (incorporated by reference, see §63.14 of Subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications. [§63.11173(e)(2)(i)]
 - b) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the

booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

[§63.11173(e)(2)(ii)]

3. All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of Subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.). [§63.11173(e)(3)]
4. All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used. [§63.11173(e)(4)]
5. As provided in §63.6(g) the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §63.6(g)(2). [§63.11173(e)(5)]
6. Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by Paragraph (e)(1) of §63.11173. The training program must include, at a minimum, the items listed in Paragraphs (f)(1) through (f)(3) of §63.11173. [§63.11173(f)]
 - a) A list of all current personnel by name and job description who are required to be trained; [§63.11173(f)(1)]
 - b) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in Paragraphs (f)(2)(i) through (2)(iv) of §63.11173. [§63.11173(f)(2)]
 - i. Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate. [§63.11173(f)(2)(i)]
 - ii. Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke. [§63.11173(f)(2)(ii)]

- iii. Routine spray booth and filter maintenance, including filter selection and installation. [§63.11173(f)(2)(iii)]
- iv. Environmental compliance with the requirements of this subpart. [§63.11173(f)(2)(iv)]
- c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in Paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters. [§63.11173(f)(3)]
- 7. As required by Paragraph (e)(1) of §63.11173, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in Paragraph (g)(2) of §63.11173. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire. [§63.11173(g)]
 - a) All personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in Paragraph (f)(2) of §63.11173 satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed. [§63.11173(g)(2)]
 - b) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years. [§63.11173(g)(3)]

Recordkeeping

- 1. The permittee shall keep certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed. [§63.11177(a)]
- 2. The permittee shall keep documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i). [§63.11177(b)]
- 3. The permittee shall keep documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4). [§63.11177(c)]
- 4. The permittee shall keep copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176. [§63.11177(d)]
- 5. The permittee shall keep records of any deviation from the requirements in §63.11173, §63.11174, §63.11175, or §63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation. [§63.11177(g)]
- 6. The permittee shall keep records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report. [§63.11177(h)]
- 7. If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period. [§63.11178(a)]

Reporting

1. Annual Notification of Changes Report. If you are the owner or operator of a motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in Paragraphs (a)(1) through (2) of §63.11176. [§63.11176(a)]
 - a) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different. [§63.11176(a)(1)]
 - b) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. [§63.11176(a)(2)]
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by Section IV of this permit.

PERMIT CONDITION EU01-002

10 CSR 10-6.220, Restriction of Emissions 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 **new** source any visible emissions with an opacity greater than 20 percent.
2. Exception: 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 60 percent.

Monitoring

1. The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are 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 permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.

3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping

The permittee shall maintain records of all observation results using Attachment F (or its equivalent), noting:

1. Whether any air emissions (except for water vapor) were visible from the emission units;
2. All emission units from which visible emissions occurred;
3. Whether the visible emissions were normal for the process;
4. The permittee shall maintain records of any equipment malfunctions (see Attachment D), which may contribute to visible emissions; and,
5. The permittee shall maintain records of all U.S. EPA Method 9 (see Attachment G) opacity tests performed.

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 in the annual compliance certification as required by Section IV of this permit.

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

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department Director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Wilson Trailer Sales, Inc. may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Wilson Trailer Sales, Inc. fails to comply with the provisions or any condition of the open burning permit.
- a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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 10-6.110 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

Emission Limitation:

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

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment E, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.165 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 10-6.250 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.

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

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

This permit 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 C

VOC Emissions Tracking Record

This sheet covers the period from _____ to _____.
(month, year) (month, year)

Emission Unit	Column A Throughput	Column B VOC Emission Factor	Column C VOC Monthly Emissions ¹	Column D
EU0010 - Paint Booth		7.97 lb/gal ²		
EPF01 – Parts Cold Cleaner		8.54 lb/gal ²		
EU0020 - Gun Cleaner		5.8 lb/gal ²		
EU04 - Paint Booth Furnace #1		5.5 lb/MMcf ³		
EU05 - Paint Booth Furnace #2		5.5 lb/MMcf ³		
EU06 - Wash Booth Furnace #1		5.5 lb/MMcf ³		
EU07 - Wash Booth Furnace #2		5.5 lb/MMcf ³		
EU08 - Cure Booth Furnace		5.5 lb/MMcf ³		
EU09 - Lunch Room Furnace		5.5 lb/MMcf ³		
EU10 - Training Room Furnace		5.5 lb/MMcf ³		
EU11 - Conference Room Furnace		5.5 lb/MMcf ³		
EU12 - Main Office Furnace		5.5 lb/MMcf ³		
EU13 - Weather Rite Furnace #1		5.5 lb/MMcf ³		
EU14 - Weather Rite Furnace #2		5.5 lb/MMcf ³		
EU15 - Co Ray Vac Furnace #1		5.5 lb/MMcf ³		
EU16 - Co Ray Vac Furnace #2		5.5 lb/MMcf ³		
EU17 - Co Ray Vac Furnace #3		5.5 lb/MMcf ³		
EU18 - Wash Booth Furnace		5.5 lb/MMcf ³		
EU19 - Evaporator Burner		5.5 lb/MMcf ³		
Total VOC emissions for this month ⁴				
12 Month VOC total from previous month's worksheet ⁵				
Monthly VOC emissions total from previous year's worksheet ⁶				
Current 12 month total VOC emissions ⁷				

¹Column C = Column A × Column B. Column A is amount of paint or solvents used or MMCF burned.

²MSDS

³FIRE

⁴Sum of emissions in Column C (in lbs, divide by 2000 to convert to tons)

⁵Running 12 month total of VOC emissions.

⁶VOC emissions reported for this month in the last calendar year

⁷Amount reported in (⁵) minus amount reported in (⁶) plus amount reported in (⁴). Less than 100.0 tons indicates compliance.

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 19, 2011;
- 2) 2010 Emissions Inventory Questionnaire, received March 21, 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) No Construction Permit Required Project #3920-0061-005, Issued January 17, 1996
- 5) No Construction Permit Required Project #1999-01-061, Issued February 18, 1999

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.

10 CSR 10-6.220 Restriction of Visible Air Contaminants

It is highly unlikely that the visible emissions from the welding, solvent cleaning, and combustion units will exceed opacity limitations, therefore no conditions were included in this permit for this rule.

Periodic monitoring of the paint booth exhaust for visible emissions was included in the permit. The installation uses filters to control particulate emissions from the paint booth. Periodic inspections of the control equipment exhaust for visible emissions are required to assure the effectiveness of the equipment. Spare filters must also be retained for this control device.

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

This rule does not apply because the installation meets the exemption in 10 CSR 10-6.260(1)(A)2. All combustion units use pipeline grade natural gas exclusively.

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

This rule does not apply because the installation meets the exemption in 10 CSR 10-6.400(1)(B)15. The installation is required to install a control device with at least 90 percent control efficiency under 40 CFR Part 63 Subpart HHHHHH.

This rule does not apply to the solvent cleaning of the painting equipment or solvent metal parts cleaning because these processes only create non-particulate solvent emissions.

This rule is not listed as an applicable regulation for the cure booth because the only pollutant emitted is VOC and the combustion products of natural gas. Gases do not meet the definition of process weight therefore this rule does not apply. [10 CSR 10-6.400(2)(A)]

This rule is also not applicable to the furnaces or evaporator because the regulation does not apply to the burning of fuel used for indirect heating. [10 CSR 10-6.400(1)(B)6]

The installation has 24 steel welding units and 26 aluminum welding units. The welding units are used in the manufacturing of truck trailers. All of the welding units are located at various sites within the building. The heat generated from an electrode/rod and the point of contact with the truck trailer produces the PM (all PM is assumed to be less than 10 microns) emitted from the welding process. There are no capture and control systems for the welding units. The smallest trailer weighs 6300 lb and the maximum weight of wire (electrode) consumed in one hour is 953 lb for a total process weight of 7253 lb/hr (3.63 ton/hr). The PM₁₀ emission factor from FIRE (SCC 30905254) is 5.2 lb/1000 lb electrode consumed.

$$PM_{10} PTE = 953 \frac{lb \text{ electrode}}{hr} \times \frac{5.2 lb PM_{10}}{1000 lb \text{ electrode}} = 4.96 lb PM_{10}/hour$$

$$E = 4.10P^{0.67}$$
$$E = 4.10 \times 3.63^{0.67} = 9.72 lb/hr$$

The uncontrolled potential to emit of PM₁₀ is less than the allowable emissions by process weight, therefore 6.400 does not apply to the welding units. [10 CSR 10-6.400(1)(B)16]

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

This rule does not apply because all of the furnaces use pipeline grade natural gas exclusively. [10 CSR 10-6.405(1)(E)]

Construction Permit Revisions

- 1) No Construction Permit Required Project #3920-0061-005, Issued January 17, 1996
This no construction permit required determination was issued for the flatbed trailer manufacturing plant. After a consultant's review of calculations, operations, and methodologies it was determined that a construction permit was required and Construction Permit #0199-002 was issued.
- 2) Construction Permit #0199-022, Issued December 18, 1998
This construction permit was issued for the flatbed trailer manufacturing plant. This permit contains no special conditions.

3) No Construction Permit Required Project #1999-01-061, Issued February 18, 1999

This no construction permit required determination was issued for the installation of an evaporator burner and tank. The evaporator consists of a 100 gallon tank and a 0.365 MMBtu/hr burner that uses natural gas as fuel. Wash water will be evaporated from the tank and this no construction permit required determination was made under the assumption that no volatile or hazardous emissions are expected from the evaporator.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart MM, *Standards for Performance of Automobile and Light-Duty Truck Surface Coating Operations*

This rule applies to the coating of automobiles and light-duty trucks. The installation coats truck trailers and not automobiles or light-duty trucks therefore this rule does not apply.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart HHHHH, *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing*

This rule applies to facilities that manufacture coatings. This installation uses coatings but does not manufacture them therefore this rule does not apply.

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

This rule applies to the coating of automobiles and light-duty trucks. The installation coats truck trailers, but not automobiles or light-duty trucks therefore this rule does not apply.

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

This rule applies to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than five percent by weight, as a cleaning and/or drying agent. [§63.460(a)]

The installation has one parts cleaner used to clean mechanical tools at the facility. The parts cleaner at this installation uses 105 Solvent therefore this rule does not apply.

The installation also has a spray gun cleaning operation and a power wash. The only HAP s contained in the solvent used in this operation are toluene, xylene, and ethylbenzene. The power wash is used for cleaning metal parts and uses sulfuric acid for cleaning purposes. Therefore this rule does not apply to these cleaning operations.

40 CFR Part 63 Subpart MMMM, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*

This rule only applies to major sources of HAP. The installation is an area source of HAP due to Permit Condition PW001 and therefore this rule does not apply. [§63.3881(b)]

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

This rule applies to autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations. The installation applies spray coating to truck trailers which fall under the definition of mobile equipment. Affected sources under this rule include spray booths and spray gun cleaning equipment. This rule has been applied to the affected sources in Permit Condition (EU01 and EU02)-001.

On May 12, 2010, the Air Pollution Control Program received an initial notification for 40 CFR Part 63 Subpart HHHHHH.

On July 7, 2010, the Air Pollution Control Program received a compliance notification for 40 CFR Part 63 Subpart HHHHHH.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)
CO	8.74
CO _{2e}	12,560.56
HAP	25
Toluene	10
NO _x	10.40
PM ₁₀	44.73
PM ₂₅	1.32
SO _x	0.06
VOC	100

Other Regulatory Determinations

The application for the Intermediate Operating Permit listed voluntary limits of 80 tons per year of VOC and 20,000 gallons per year of paints and solvents as applicable requirements. Since the VOC limit required for area status and qualification for this intermediate operating permit is only 100 tons per year, the installation has chosen to accept the voluntary limit of 100 tons per year instead of the limits listed in the application.

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:

Colin Janssen
Environmental Engineer

CERTIFIED MAIL: 70093410000193530746
RETURN RECEIPT REQUESTED

Mr. Les Keleher
Wilson Trailer Sales, Inc.
1600 Route DD
Moberly, MO 65270

Re: Wilson Trailer Sales, Inc., 175-0061
Permit Number: **OP2012-023**

Dear Mr. Keleher:

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 Colin Janssen at 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/cjk

Enclosures

c: Northeast Regional Office
PAMS File: 2011-05-056