



## 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.

**Operating Permit Number:** OP2016-017  
**Expiration Date:** JUN 15 2021  
**Installation ID:** 165-0028  
**Project Number:** 2014-12-011

**Installation Name and Address**

Woodbridge Corporation - Kansas City  
Foam  
555 NW Platte Valley Drive  
Riverside, MO 64150  
Platte County

**Parent Company's Name and Address**

Woodbridge Holdings Inc.  
4240 Sherwoodtowne Blvd.  
Mississauga Ontario, L4Z 2G6

**Installation Description:**

Woodbridge Corporation produces molded polyurethane foam car seats. In this process a release agent is applied to a mold then metal parts are inserted into the mold so that the foam will maintain the desired shape. Liquid foam mixture is injected into the mold, heat is applied to transform the liquid into solid foam so the mold can be removed. Emission Units include the MDI polyurethane foam manufacturing line, space heaters and three 1.65 MMBtu/hr natural gas heaters. This facility has voluntary limits on VOC and HAP emissions to below major levels.

Prepared by  
Jill Wade, PE  
Operating Permit Unit

Director or Designee  
Department of Natural Resources

JUN 15 2016

Effective Date

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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-07	Release Agent (TDI Line)

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

<u>Description of Emission Source</u>	
EP-01B	Tank Farm
EP-02	Catalyst Pre-Mix Vent
EP-03	Fugitive Air Toxics Releases (TEI, DEOA, MDI)
EP-04	Pouring Process Vent
EP-06	Demold & Gas Ovens
EP-09	Roller Vacuum Exhaust
EP-10	Glue Repair
EP-11	Fugitive VOC Releases (Pre-Mix & Surge)
EP-12	Space Heaters
EP-13	Raw material Receiving – TDI & MDI
EP-15	Process Heaters
EP-16	Three 1.65 MMBtu/hr Natural Gas Heaters
EP-17	Pouring Operation and Demold Vent (MDI Line)
EP-18	Inkjet Stamping of Foam

## II. Plant Wide Emission Limitations

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

**PERMIT CONDITION PW001**  
 10 CSR 10-6.060 Construction Permits Required  
 Construction Permit 042016-006, Issued April 4, 2016

**Emission Limitations:**

- 1) The permittee shall emit less than 250 tons of volatile organic compounds (VOCs) from this installation in a consecutive 12-month period. Emission points included in the installation are listed in Table 1 below. [Special Condition 2.A]
- 2) The permittee shall emit less than 10 tons of individual hazardous air pollutants (HAP) from this installation in a consecutive 12-month period. Emission points included in the installation are listed in Table 1 below. [Special Condition 2.C]
- 3) The permittee shall emit less than 25 tons of combined hazardous air pollutants (HAPs) from this installation in a consecutive 12-month period. Emission points included in the installation are listed in Table 1 below. [Special Condition 2.B]

Table 1: Installation Emission Points

Emission Unit	Description
EP-01A	TDI and MDI Raw Material Storage
EP-01B	Tank Farm Polyol
EP-02	Catalyst Pre-Mix Vent
EP-03	Fugitive Air Toxic Releases
EP-04	Pouring Process Vent (TDI Line)
EP-06	Demold & Gas Ovens (TDI Line)
EP-07	Release Agent (TDI Line)
EP-09	Roller Vacuum Exhaust (TDI Line)
EP-10	Glue Repair (TDI Line)
EP-11	Fugitive VOC Releases (Pre-Mix & Surge)
EP-12	Space Heating
EP-13	Raw Material Receiving – TDI & MDI
EP-15	Process Heaters
EP-16	Solvent Release Agent (MDI Line)
EP-17	Pouring Operation and Demold Vent (MDI Line)
EP-18	Inkjet Stamping of Foam

**Monitoring/Recordkeeping:**

- 1) The permittee shall use Attachment A or an equivalent form approved by the Air Pollution Control Program to demonstrate compliance with the VOC emission limitation. [Special Condition 2.D]
- 2) The permittee shall use Attachments B and C or equivalent forms approved by the Air Pollution Control Program to demonstrate compliance with the HAP emission limitations. [Special Condition 2.E]
- 3) All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources personnel upon request. These records shall include Material Safety Data Sheets (MSDS) and purchasing/inventory records sufficient to substantiate VOC usage figures for all materials used. [Special Condition 3.A]

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the date that records show that the installation exceeded the VOC or HAP emission limitations. [Special Condition 3.B]
- 2) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

### III. Emission Unit Specific Emission Limitations

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

<b>PERMIT CONDITION 001</b> 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63 Subpart OOOOOO, National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources
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<b>TDI Line</b>	
Emission Unit	Description
EP-07	Release Agent (TDI Line)

**Standards:**

- 1) The permittee must not use a material containing methylene chloride as equipment cleaner to flush the mixhead or use a material containing methylene chloride elsewhere as equipment cleaner in a molded flexible polyurethane foam process. [§63.11416(c)(1)]
- 2) The permittee must not use a mold release agent containing methylene chloride in a molded flexible polyurethane foam process. [§63.11416(c)(2)]
- 3) The permittee must not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process. [§63.11416(e)]

**Compliance Requirements:**

- 1) The permittee may demonstrate compliance using adhesive usage records or Material Safety Data Sheets. [§63.11416(f)]
- 2) The permittee must have a compliance certification on file that contains the following statement(s) and must be signed by the Responsible Official:
  - a) “This facility does not use any equipment cleaner to flush the mixhead which contains methylene chloride, or any other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process in accordance with §63.11416(c)(1)” [§63.11417(c)(1)(i)]
  - b) “This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with §63.11416(c)(2).” [§63.11417(c)(1)(ii)]

**Recordkeeping/Reporting:**

- 1) The permittee must maintain records of the information used to demonstrate compliance. Records must be maintained for five years with the last two years of data retained on-site. [§63.11417(d)]
- 2) Compliance information reports including any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted to the Environmental Protection Agency Region 7 Missouri Air Compliance Coordinator in Lenexa Kansas, 11201 Renner Blvd., Lenexa, KS 66219.
- 3) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program’s

Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

## IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following 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) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) 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(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(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(6)(C)3.B]

#### **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 pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 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 10-6.165 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. This odor evaluation shall be taken at a location outside of the installation's property boundary.

**10 CSR 10-6.170**

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

**Emission Limitation:**

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

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

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

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

#### **10 CSR 10-6.280 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”;
  - 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.

#### **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.

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- 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 record keeping 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*

## 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(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(6)(C)1.C General Record Keeping and Reporting Requirements**

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
    - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
    - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, 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(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(6)(C)1.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **10 CSR 10-6.065(6)(C)1.G 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 pursuant to 10 CSR 10-6.065(6)(C)1.

**10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

**10 CSR 10-6.065(6)(C)3 Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and

- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

#### **10 CSR 10-6.065(6)(C)6 Permit Shield**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The applicable requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

#### **10 CSR 10-6.065(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(6)(C)8 Operational Flexibility**

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd.,

Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.065(6)(C)9 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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.
  - 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; and
  - d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Rex Rogers, Site Operations 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(6)(E)6 Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) 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,
- 3) 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,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

#### **10 CSR 10-6.065(6)(E)1.C Statement of Basis**

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

## **VI. Attachments**

Attachments follow.

**ATTACHMENT A**  
**VOC Emissions Tracking**

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

Table A: Covers EP-01, EP-02, EP-03, EP-04, EP-06, EP-09, EP-11, EP-12, EP-13, EP-15 and EP-17

	Individual Totals:	(Units)	Emission Factor	Month Total (lbs):
EP-01A Raw Material Storage (TDI and MDI)		1000 gallons	0.00055 lb VOC/1000 gallons	
EP-01B Tank Farm Polyol – Working Loss		1000 gallons	0.000468 lb VOC/1000 gallons	
EP-02 Catalyst Pre Mix Vent		hours	0.000596 lb VOC/hr	
EP-03 Fugitive Air Toxic Releases		Tons of foam produced	0.082 lb VOC/ton of foam produced	
EP-04 Pouring Process Vent		hours	0.003467 lb VOC/hr	
EP-06 Demold & Gas Ovens		hours	0.006029 lb VOC/hr	
EP-09 Roller Vacuum Exhaust		hours	0.0196 lb VOC/hr	
EP-11 Fugitive VOC Releases from Catalyst Pre-mix and Surge		hours	0.000596 lb VOC/hr	
EP 12 Space Heating		mmcf	5.50 lb VOC/mmcf	
EP-13 Raw Material Receiving TDI & MDI		1000 Gallons of TDI&MDI delivered	0.002079 lb VOC/1000 gallon of TDI/MDI delivered	
EP-15 Process Heaters		mmcf	5.50 lb VOC/mmcf	
EP17 MDI Pouring Operation and De-Mold Vent		Hours	0.009496 lb VOC/hour	
<sup>1</sup> Total VOCs this month (tons):		tons	N/A	N/A

<sup>1</sup> Add together the VOC emission totals for the above emission points, and then divide the total VOC emissions (lbs) by 2000 lb/ton to get the resulting VOC emissions for the given month

Table B Release Agent TDI Line (EP-7), Release Agent MDI Line (EP-16), and Inkjet Stamping of Foam (EP-18)

Emission Point	Raw Material Usage (gal)	<sup>1</sup> Material Density (lbs/gal)	<sup>2</sup> VOC Content (%)	<sup>3</sup> Monthly VOC Emissions <sup>1</sup> (lbs)
<sup>4</sup> Total VOC Emissions for this Month:				tons

<sup>1</sup> Input the Material Density (lbs/gal) from the material SDS for the release agent. This document must be kept in the records for justification upon request by Missouri Department of Natural Resources  
<sup>2</sup> Input the VOC Content (weight %) from the material SDS for the release agent. This signed document must be kept in the records for justification upon request by Missouri Department of Natural Resources  
<sup>3</sup> Multiply the raw material usage by the material density and VOC Content (weight %) of the respective release agent. This product will be the resulting amount of VOCs (lbs) from a release agent. This process shall be repeated for each release agent used each month  
<sup>4</sup> Add together the VOC emission totals for EP-7, EP-16, and EP-18 and then divide the total VOC emissions (lbs) by 2000 lb/ton to get the resulting i VOC emissions) for the given month.

Table C: Installation VOC Emission Totals

<sup>1</sup> Total VOCs this month (tons):		tons
<sup>2</sup> 12-Month VOC Emissions (tons):		tons

<sup>1</sup>Sum the VOC Emission Total values from Table A and Table B to get the installation monthly VOC emissions  
<sup>2</sup>Sum all of the VOC emissions values (tons) from each monthly emissions total, found in the “Total VOCs this month” row on each month’s tracking sheet. This value shall not exceed **250.0 tons** in any consecutive 12-month period

**ATTACHMENT B**  
 Individual HAP Emissions Tracking Record

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_ for \_\_\_\_\_.  
 (month, year) (month, year) (specify HAP)

<b>Date (month/year)</b>	<b>Column A Emission Point</b>	<b>Column B Raw Material Usage (gal)</b>	<b>Column C Material Density (lbs/gal)</b>	<b>Column D Individual HAP Content (%)</b>	<b>Column E Monthly Individual HAP Emissions<sup>1</sup> (tons)</b>	<b>Column F Sum of Most Recent 12-months HAP<sup>2</sup> (tons)</b>
	Total Individual HAP Emissions for this Month:					
	Total Individual HAP Emissions for this Month:					
	Total Individual HAP Emissions for this Month:					
	Total Individual HAP Emissions for this Month:					

<sup>1</sup>Column E = (Column B) x (Column C) x (Column D) / 2000.

<sup>2</sup>Sum of the last 12 consecutive monthly individual HAP emissions totals including the current month.

**ATTACHMENT C**  
 Aggregate HAP Emissions Tracking Record

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

Date (month/year)	Column A Emission Point	Column B Raw Material Usage (gal)	Column C Material Density (lbs/gal)	Column D Total HAP Content (%/100)	Column E Monthly Aggregate HAP Emissions <sup>1</sup> (tons)	Column F Sum of Most Recent 12-months HAP <sup>2</sup> (tons)
	Total Aggregate HAP Emissions for this Month:					
	Total Aggregate HAP Emissions for this Month:					
	Total Aggregate HAP Emissions for this Month:					
	Total Aggregate HAP Emissions for this Month:					

<sup>1</sup>Column E = (Column B) x (Column C) x (Column D) / 2000.

<sup>2</sup>Sum of the last 12 consecutive monthly aggregate HAP emissions totals including the current month



## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

Woodbridge Corporation produces molded polyurethane foam car seats. In this process a release agent is applied to a mold then metal parts are inserted into the mold so that the foam will maintain the desired shape. Liquid foam mixture is injected into the mold, heat is applied to transform the liquid into solid foam so the mold can be removed. Emission Units include the MDI polyurethane foam manufacturing line, space heaters and three 1.65 MMBtu/hr natural gas heaters. This facility previously held an Intermediate Operating Permit but has requested a relaxation to the plantwide VOC limit to 250 tons/year which makes it a Part 70 source. This facility has voluntary limits on HAP emissions to below major levels

### Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) <sup>1</sup>
CO	2.79
HAP	<10/25
NO <sub>x</sub>	3.32
PM <sub>10</sub>	0.25
PM <sub>2.5</sub>	0.25
SO <sub>x</sub>	0.02
VOC	<250

The PTE for HAP and VOC are limited by the emission limitations in Plantwide Permit Condition PW001. The PTE for all other pollutants assumes 8760 hours of operation of the remaining emission units (Space Heaters and Gas Heaters) when burning natural gas.

### Reported Air Pollutant Emissions, tons per year

Pollutants	2014	2013	2012	2011	2010
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )		2013	2012	2011	2010
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )		0.11	0.12	0.12	0.13
Sulfur Oxides (SO <sub>x</sub> )		0.11	0.12	0.12	0.13
Nitrogen Oxides (NO <sub>x</sub> )		---	---	---	0.01
Volatile Organic Compounds (VOC)		1.50	1.65	1.65	1.66
Carbon Monoxide (CO)		91.64	72.77	89.79	89.82
Lead (Pb)		1.26	1.38	1.38	1.39
Hazardous Air Pollutants (HAPs)		0.19	0.42	0.58	0.56
Ammonia (NH <sub>3</sub> )					

### 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) Part 70 Operating Permit Application, received December 4, 2014;
- 2) 2013 Emissions Inventory Questionnaire, received April 25, 2014; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) WebFIRE;
- 5) Construction Permit 0596-024, Issued May 15, 1996;
- 6) Construction Permit 1297-027, Issued December 24, 1997;
- 7) Construction Permit 032000-014, Issued March 21, 2000;
- 8) Operating Permit OP2010-050, Issued June 10, 2010; and
- 9) Construction Permit 042016-006, Issued April 4, 2016

### **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 the following requirements to not be applicable to this installation at this time for the reasons stated.

#### *10 CSR 10-6.100, Alternate Emission Limits*

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

#### *10 CSR 10-2.210, Control of Emissions From Solvent Metal Cleaning*

Emission Unit 0010 (from previous OP) – EP-05 Degreasing Units were solvent based cold cleaners and have been replaced by citric cleaning agents, therefore this rule no longer applies and was not included in the operating permit.

#### *10 CSR 10-6.2.040, Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

This rule was rescinded and replaced with 10 CSR 10-6.405, *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating* which does not apply to the 1.65 MMBtu/hr gas heaters or the space heaters because according to 10 CSR 10-6.405(1)(E), an emission unit fueled by natural gas is exempt.

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

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

These rules do not apply because the combustion equipment at this installation uses only pipeline grade natural gas.

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

This rule was not included in the operating permit for the natural gas fired space heater and bake ovens. The primary emissions from these units that could cause opacity issues are from the combustion of natural gas. Periodic monitoring is not being included in permit because by the nature of the fuel, no opacity exceedances would ever be expected under normal operating conditions.

### **Construction Permit History**

The following construction permits have been issued to this facility:

Construction Permit 0596-024, Issued May 15, 1996

This construction permit authorized the change of the mold release chemical from water based to a solvent based material that would generate VOC emissions. The permit placed the 100 ton per year VOC limit and 10/25 ton per year HAP limits on the existing equipment at the time. Those limits were replaced in the operating permit by Permit Condition PW001 which places the same emission limits on all equipment currently at the facility.

Construction Permit 1297-027, Issued December 24, 1997

This construction permit authorized the replacement of electric heaters with the three 1.65 MMBtu/hr natural gas heaters. This permit contained no special conditions.

Construction Permit 032000-014, Issued March 21, 2000

This construction permit authorized the construction of a new MDI polyurethane foam manufacturing line. This permit contained no special conditions.

Construction Permit 042016-006, Issued April 4, 2016

This construction permit authorized the increase in production by increasing the VOC emissions limitation. The conditions of this permit supersede all special conditions found in construction permit 0596-024.

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

None.

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

40 CFR Part 63 Subpart III, *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production*

This Subpart applies to processes that are located at a plant site that is a major source. Since the facility does not fit the definition of major source this subpart does not apply.

40 CFR Part 63 Subpart M, *National Emission Standards for Hazardous Air Pollutants: Flexible Polyurethane Foam Fabrication Operations*

This Subpart applies to facilities that operate a flame lamination affected source as defined in section 63.8784(b)(2) and that is located at or is a part of a major emission source of HAPs, or that operates a loop splitter affect source as defined in Section 63.8784(b)(1), that meets the criteria in paragraphs (a)(1) and 92) of Section 63.8782. Since this facility does not operate these units, this Subpart does not apply.

40 CFR Part 63 Subpart O, *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources*

This Subpart applies to Emission Unit EP-07, the TDI line. This subpart prohibits the use of materials containing methylene chloride for equipment cleaning, for use as a releasing agent or any other use in the flexible polyurethane foam fabrication process. It is included in the operating permit at Permit Condition 001.

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

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

#### **Compliance Assurance Monitoring (CAM) Applicability**

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

#### **Other Regulatory Determinations**

None.

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

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

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

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

## **Response to Public Comments**

No comments were received during the public notice period.