

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: OP2017-091
Expiration Date: MAY 01 2023
Installation ID: 183-0129
Project Number: 2016-08-003

Installation Name and Address

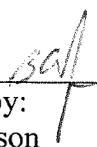
Woodbridge Corporation
11 Cermak Boulevard
St. Peters, MO 63376
St. Charles County

Parent Company's Name and Address

Woodbridge Foam Corporation
4240 Sherwoodtowne Boulevard
Mississauga, Ontario, Canada L4Z2G

Installation Description:

Woodbridge Corporation manufactures foam automobile seats made from molded flexible polyurethane. It also receives methylene diisocyanate (MDI) in bulk containers and transfers it to smaller containers for shipment to other Woodbridge facilities. The installation is a synthetic minor source of Volatile Organic Compounds.


Prepared by:
Bern Johnson
Operating Permit Unit


Director or Designee
Department of Natural Resources

MAY 01 2018

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 which emits air pollutants and identified as having unit-specific emission limitations.

Emission Unit	Description
EP-16	Solvent Release Agent
EP-17	Parts Washer - Solvent Degreaser

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Unit	Description
EP-01	Demold and Crusher Exhaust
EP-02	Wax Releasing Agent Application Vent (TDI)
EP-03	Insert Area
EP-04	TDI Pouring Process Vent: 55 gallon tank and 30 gallon tank
EP-05	Catalyst Pre-Mix Vent: 40 gallon tank, 4x60 gallon tanks, and 5x400 gallon tanks
EP-06a	TDI Raw Material Storage: 2x14,400 gallon tanks
EP-06b	Polyol Tank Farm: 6x14,400 gallon tanks
EP-07	Glue Repair
EP-08	Raw Material Receiving (TDI) from 5,000 gallon trucks or 18,000 gallon railcars
EP-09	Space Heating: Natural Gas; MHDR = 23 MMBTU/hr
EP-10	Fugitive Air Toxic Releases
EP-18	Anti-Squeak Spray
EP-19	Anti-Flame Retardant
EP-25	Inkjet Foam Stamping
-	7 HP electric boiler
EP-27	MDI Drumming Operation

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW 1

10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitations:

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

Monitoring:

The permittee shall maintain an accurate record of VOC emissions. The permittee uses custom spreadsheets for emissions tracking (see Attachment A).

Recordkeeping:

- 1) The permittee shall record all required record keeping in an appropriate format.
- 2) Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
- 3) The permittee shall keep a copy of this operating permit and review, copies of all issued construction permits and reviews, and copies of all Safety Data Sheets (SDS) on site.
- 4) All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

Reporting:

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of any permit condition in the annual compliance certification.
- 3) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov

PERMIT CONDITION PW 2

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

Note: Woodbridge is a flexible polyurethane foam fabrication process

Operational Limitations:

- 1) The permittee shall comply with the following requirements: [§63.11416(c)]
 - a) The permittee shall not use a material containing methylene chloride as an equipment cleaner to flush the mixhead or use a material containing methylene chloride elsewhere as an equipment cleaner in a molded flexible polyurethane foam process. [§63.11416(c)(1)]
 - b) The permittee shall not use a mold release agent containing methylene chloride in a molded flexible polyurethane foam process. [§63.11416(c)(2)]
- 2) The permittee shall not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process. [§63.11416(e)]
- 3) The permittee may demonstrate compliance with the requirements in 1) and 2) using adhesive usage records, SDS, and engineering calculations. [§63.11416(f)]
- 4) The permittee shall refer to Table 1 to Subpart OOOOOO for 40 CFR Part 63, Subpart A applicability.

Recordkeeping/Reporting:

- 1) The permittee shall have a compliance certification on file by July 16, 2007. This certification shall contain the statements in §63.11417(c)(1) and shall be signed by a responsible official.
[§63.11417(c)]
 - a) For a molded foam affected source: [§63.11417(c)(1)]
 - i) “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)]
 - ii) “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)]
- 2) The permittee shall maintain records of the information used to demonstrate compliance, as required in §63.11416(f). The permittee shall maintain the records for five years, with the last two years of data retained on site. The remaining three years of data may be maintained off site. [§63.11417(d)]
- 3) All records shall be made available immediately to Missouri Department of Natural Resources’ personnel upon request.
- 4) The permittee shall report any deviations of this permit condition to the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the semi-annual monitoring report and annual compliance certification, 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 on the date of permit issuance.

PERMIT CONDITION 1	
10 CSR 10-5.300 Control of Emissions From Solvent Metal Cleaning	
Emission Unit	Description
EP-17	Parts Washer – Solvent Degreaser

Equipment Specifications:

- 1) The permittee shall not use a cold cleaning solvent with a vapor pressure greater than 1.0 mmHg at 20 °C.
- 2) Each cold cleaner shall have a cover which prevents the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
 - a) The cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs if any of the following conditions exist: (For covers larger than 10 ft², this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
 - i) The solvent vapor pressure is greater than 0.3 psi measured at 37.8°C;
 - ii) The solvent is agitated; or
 - iii) The solvent is heated.
- 3) The permittee may use an alternate method for reducing cold cleaning emissions if the permittee demonstrates the level of emission control is equivalent to or greater than the above requirements. The alternate method shall be approved by the Director and EPA.
- 4) Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining.
 - a) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C, then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
- 5) Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
- 6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
- 7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C or heated above 48.9°C shall employ one of the following control devices:
 - a) A freeboard ratio of at least 0.75;
 - b) Water cover (solvent shall be insoluble in and heavier than water); or
 - c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65 percent. These control systems shall receive approval from the Director and EPA prior to their use.

Operational Limitations:

- 1) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent shall drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
- 2) Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner.
- 3) Whenever a cold cleaner fails to perform within the rule operating requirements, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the rule operating requirements.
- 4) Solvent leaks shall be repaired immediately or the cold cleaner shall be shut down until the leaks are repaired.
- 5) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the Director and EPA:
 - a) Reduction of the waste material to less than 20 percent VOC solvent by distillation and proper disposal of the still bottom waste; or
 - b) Stored in closed containers for transfer to—
 - i) A contract reclamation service; or
 - ii) A disposal facility approved by the Director and EPA.
 - c) Waste solvent shall be stored in closed containers only.
- 6) Cleaning of spray guns shall be accomplished by one or more of the following methods:
 - a) Enclosed spray gun cleaning:
 - i) Enclosed system spray gun cleaning shall consist of forcing solvent through the spray gun and/or spray gun parts. Spray guns and/or spray gun parts shall only be cleaned in remote closed top spray gun cleaning machines under the following conditions:
 - (1) The spray gun cleaning machine is operated within the manufacturer's specifications and with the lid kept tightly closed at all times except when being accessed or maintained; and
 - (2) Removable containers (which shall not exceed 30 gallons in size) for clean, used and waste solvent, are kept tightly closed except when being accessed or maintained;
 - b) Nonatomized spray gun cleaning:
 - i) Nonatomized spray gun cleaning shall consist of placing solvent in the pressure pot and forcing it through the spray gun with the atomizing cap in place. Spray guns shall only be cleaned through nonatomized spray gun cleaning under the following conditions:
 - (1) No atomizing air shall be used; and
 - (2) The cleaning solvent from the spray gun shall be directed into a pail, bucket, drum or other waste container that is closed when not in use;
 - c) Disassembled spray gun cleaning:
 - i) Disassembled spray gun cleaning shall be accomplished by disassembling the spray gun to be cleaned and cleaning the components by one of the following methods:
 - (1) By hand in a spray gun cleaner, which shall remain closed except when in use; or
 - (2) By soaking in a spray gun cleaner, which shall remain closed during the soaking period and when not inserting or removing components;

- d) Atomized spray gun cleaning:
 - i) Atomized spray gun cleaning shall consist of forcing the cleaning solvent through the gun and directing the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions. Cleaning of the nozzle tips of an automated spray equipment system is exempt from these operational limitations, unless the system is a robotic system that is programmed to spray into a closed container.
- 7) Any waste material removed from a spray gun cleaning system shall be disposed of by one of the following methods or an equivalent method approved by the Director and EPA:
 - a) Reduction of the waste material to less than 20 percent VOC solvent by distillation and proper disposal of the still bottom waste; or
 - b) Stored in closed containers for transfer to—
 - i) A contract reclamation service; or
 - ii) A disposal facility approved by the Director and EPA.
 - c) Waste solvent shall be stored in closed containers only.

Operator and Supervisor Training:

- 1) Only persons trained in the equipment specifications and operational limitations specified above for this particular solvent metal cleaning process shall be permitted to operate the equipment.
- 2) Supervisors of any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operator.
- 3) A procedural review shall be given to all solvent metal cleaning equipment operators at least once every 12 months.
- 4) The permittee shall retain training records.

Recordkeeping:

- 1) The permittee shall retain records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. The records also shall include maintenance and repair logs for both the degreaser and any associated control equipment. These records shall be kept current and made available for review on a monthly basis. The Director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule.
- 2) The permittee shall retain records which include for each purchase of cold cleaning solvent:
 - a) The name and address of the solvent supplier;
 - b) The date of purchase;
 - c) The type of solvent; and
 - d) The vapor pressure of the solvent in mmHg at 20°C.
- 3) The permittee shall retain records which include for each sale of cold cleaning solvent:
 - a) The name and address of the solvent purchaser;
 - b) The date of sale;
 - c) The type of solvent;
 - d) The unit volume of solvent;
 - e) The total volume of solvent; and
 - f) The vapor pressure of the solvent measured in mmHg at 20°C.
- 4) Records shall be retained of all solvent metal cleaning training completed for compliance with this regulation. Records may be kept in either written or electronic form.
- 5) All records shall be retained for five years and shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of any permit condition in the annual compliance certification.
- 3) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov

PERMIT CONDITION 2	
10 CSR 10-6.060 Construction Permits Required Construction Permit 1096-013, Issued October 3, 1996	
Emission Unit	Description
EP-16	Solvent Release Agent

Emission Limitation:

The permittee shall not emit more than 94.0 tons of VOCs per rolling 12-month period from EP-16 Solvent Release Agent.[Special Condition 1]

Monitoring:

The permittee shall maintain an accurate record of VOC emissions. The permittee uses custom spreadsheets for emissions tracking (see Attachment A).

Recordkeeping:

- 1) The permittee shall record all required record keeping in an appropriate format.
- 2) Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
- 3) The permittee shall keep a copy of this operating permit and review, copies of all issued construction permits and reviews, and copies of all Safety Data Sheets (SDS) on site.
- 4) All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

Reporting:

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of any permit condition in the annual compliance certification.
- 3) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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

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

- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

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

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

Emission Limitation:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

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

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

10 CSR 10-6.280 Compliance Monitoring Usage

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

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

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

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations
(Rescinded on February 11, 1979, Contained in State Implementation Plan)**

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

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

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

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

V. General Permit Requirements

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

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

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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

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

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, 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)

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

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

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

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

None

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

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

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

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

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

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

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

The application utilized in the preparation of this permit was signed by Todd Dooley, 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) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.

Attachment A
Custom Tracking Worksheets

Emissions tracking forms, whether paper or electronic, must contain at minimum the following:

Plantwide PW 1 emission limit:

- Permit Condition PW 1 of this operating permit limits the emissions of volatile organic compounds (VOC's) emitted by this installation to less than 100 tons of VOC's in any rolling 12-month period. When calculating the total emissions, be sure to include emissions from all emissions sources at this installation, listed on page 3 of this operating permit as EP-01 through EP-27. Emissions may be grouped by type; for example, all natural gas combustion sources may be grouped and tracked together by fuel usage.
- Record at a minimum the following information:
 - The hours of operation for EP-01 through EP-05; use the emissions factors from stack test in pounds per hour (lb/hr)
 - The material usage for EP-06 in units of 1000 gallon per hour; use the emission factor from AP-42 – 0.0448 lbs/1000 gal; include any fugitive air toxics releases from EP-08 and EP-10.
 - The fuel consumption in MMSCF for EP-09; use the emission factor from AP-42 of 5.5 lbs/MMSCF
 - Solvent usage from EP-16 and EP-17; use Safety Data Sheet information to derive the percentage of VOC's in the solvents. Calculate monthly VOC emissions by multiplying the percentage of VOC's in the solvents by the monthly solvent usage.
 - The amount of materials used for EP-07, EP-18, EP-19, EP-25 and EP-27; the emission factors for these processes are calculated by mass balance.
- Calculate monthly VOC emissions by multiplying throughput and emission factor for each type.
- Calculate rolling 12-month VOC emissions by adding current month's emissions to previous eleven months emissions
- Compare emission total to limit and indicate whether or not compliance was met
- Include startup, shutdown and malfunction (SSM) emissions, if any, from the same 12 month period as reported to the Air Pollution Control Program, in accordance with 10 CSR 10- 6.050 *Startup, Shutdown and Malfunction Conditions*.

Permit Condition 2 emission limit:

- Per Special Condition 1 of construction permit 1096-013, incorporated in this operating permit as Permit Condition 2, track and record the emissions of volatile organic compounds (VOC's) from emission point #16 (EP-16) to insure that the emissions of VOC's will not exceed 94 tons of VOC's in any twelve month period.
- Record the monthly solvent release agent usage by EP-16.
 - The emission factor to be used is the percentage of VOC in the solvent release agent, which is found in the Safety Data Sheet(s) (SDS) for the solvent release agent(s).
- Calculate monthly VOC emissions by multiplying the amount of solvent release agent used each month (the throughput) by the emission factor found from the SDS(s).
- Calculate rolling 12-month emissions of VOC's by adding current month's emissions to previous eleven months emissions

- Compare emission total to limit (94 tons) and indicate whether or not compliance was met
- Include startup, shutdown and malfunction (SSM) emissions, if any, from the same 12 month period as reported to the Air Pollution Control Program, in accordance with 10 CSR 10- 6.050 *Startup, Shutdown and Malfunction Conditions*.

STATEMENT OF BASIS

Voluntary Limitations

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

INSTALLATION DESCRIPTION

Woodbridge Corporation manufactures foam automobile seats made from molded flexible polyurethane. It also receives MDI in bulk containers and transfers it to smaller containers for shipment to other Woodbridge facilities. The installation is a synthetic minor source of Volatile Organic Compounds and Hazardous Air Pollutants. Woodbridge Corporation is not a named source and fugitive emissions do not count for potential-to-emit.

The MDI operation consists of: receiving MDI in bulk tankers and repackaging the MDI into 55-gallon drums and 275-gallon totes to be sent to other plants. The following materials are repackaged using this operation: Icyne - 100% Polymethylene polyphenyl isocyanate (PMDI) CAS # 9016-87-9. PMDI contains 50% MDI; XM0010 MDI - 100% PMDI; and XB 0204 - 5% Diethanolamine (DEOA) CAS # 111-42-2 - Contains no MDI.

Recent changes to the facility include the dismantling of paint booth EP-26 and addition of MDI drumming operations, EP-27 (described above).

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹	HAP	Potential to Emit (tons/yr) ¹
CO	8.30	All isocyanates	0.52
NO _x	0.05	DEOA	3.29
PM ₁₀	11.41	Chloroprene	0.01
PM _{2.5}	0.95	Toluene	0.00
SO _x	0.19	Methanol	0.71
VOC	159.92	total HAP	4.72

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
CO	0.00	0.00	0.00	0.00	0.00
NO _x	0.00	0.00	0.00	0.00	0.00
PM ₁₀	0.00	0.00	0.00	0.00	0.01
PM _{2.5}	0.00	0.00	0.00	0.00	0.01
SO _x	0.00	0.00	0.00	0.00	0.00
VOC	90.0	91.31	75.21	83.09	89.65
HAPs	0.28	0.31	0.48	0.37	0.44

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 December 7, 2015;
- 2) 2016 Emissions Inventory Questionnaire, received April 27, 2017;
- 3) Construction Permit 1093-013, Issued October 03, 1996;
- 4) No Construction Permit Required Determination, Issued April 02, 1997;
- 5) Construction Permit 0898-010, Issued July 23, 1998;
- 6) Construction Permit 082002-016, Issued May 24, 2002;
- 7) No Construction Permit Required Determination, Issued January 20, 2005; and
- 8) No Construction Permit Required Determination, Issued April 23, 2010;
- 9) WebFIRE; and
- 10) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;

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 10-5.330 *Control of Emissions From Industrial Surface Coating Operations* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to any installation with actual VOC emissions greater than 2.5 ton/yr from surface coating operations covered under this rule. [10 CSR 10-5.330(1)(B)] This rule does not cover molding operations.

10 CSR 10-5.520 *Control of Volatile Organic Compound Emissions From Existing Major Sources* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to installation that have the potential to emit greater than 100 tons of VOC per year. [10 CSR 10-5.520(1)] The permittee accepted a voluntary limit of 100 tons of VOC per year in order to obtain this Intermediate operating permit (see Permit Condition PW 1). With the issuance of this permit the voluntary limit becomes a federally enforceable permit condition. If the permittee violates the limit at any time, the permittee will be in violation of this permit and will be subject to this regulation.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* – the only emission unit subject to this rule, EP-26 Spray Paint Booth, was dismantled. All other possible visible emission sources are contained inside the main building.

10 CSR 10-6.261 *Control of Sulfur Dioxide Emissions* is not applicable to the installation and has not been applied within this permit. The installation's only source of sulfur emission is EP-09 Space Heating which exclusively combusts pipeline grade natural gas and is exempt from the regulation under 10 CSR 10-6.261(1)(A).

10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-6.405(1)(E) exempts installations that are fueled exclusively by natural gas.

Construction Permit History

Construction Permit 1096-013, Issued October 3, 1996 - This general construction permit is for the switch from water-based spray wax release agents to solvent-based spray wax release agents in EP-16 (see Permit Condition 2).

Construction Permit 0898-010, Issued July 23, 1998 - This de minimis construction permit was for the installation of EP-18 Anti-Squeak Spray. It does not contain any special conditions.

Construction Permit 082002-016, Issued May 24, 2002 - This de minimis construction permit was for the installation several processes, which were never installed.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subparts D, Da, Db, and Dc – *Standards of Performance for Steam Generating Units* are not applicable. The installation's only steam generating unit is a seven HP electric boiler.

40 CFR Part 60, Subparts Kb – *Standards of Performance for Storage Vessels* is not applicable. Subpart Kb applies to storage vessels greater than 75 m³ (19,812 gallons) in capacity. The installation's largest storage tanks are less than 15,000 gallons each.

40 CFR Part 60, Subpart FFF – *Standards of Performance for Flexible Vinyl and Urethane Coating and Printing* is not applicable to the installation. This regulation is applicable to rotogravure printing lines used to print or coat flexible vinyl or urethane products. [§60.580(a)] The polyurethane seats produced at the installation are printed/stamped; however, the printing process used is inkjet rather than rotogravure.

40 CFR Part 60, Subpart VVV – *Standards of Performance for Polymeric Coating of Supporting Substrates Facilities* is not applicable to the installation. This regulation is applicable to “a web coating process that applies elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil”. [§60.740(a)] The permittee employs a molding process rather than a web coating process.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart III – *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production* is not applicable to the installation. This regulation is applicable to flexible polyurethane foam processes emitting HAPs at a major source of HAPs. [§63.1290(a)] The installation does produce flexible polyurethane foam; however, the installation has taken plantwide emission limits below major levels so it is an area source of HAPs.

40 CFR Part 63, Subpart IIII – *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks* is not applicable to the installation. This regulation is applicable to facilities which surface coat new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks. [§63.3080] §63.3081(b)(1)(i) exempts coating operations located at a plastic or composites molding facility where §63.3176 defines *plastic or composites molding facility* as “a facility where the purchase cost of capital equipment used for plastic or composites molding, including presses, tooling, and associated material processing and handling equipment, is greater than the purchase cost of capital equipment used for the surface coating of new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks.” The permittee meets the definition of plastic or composites molding facility and is exempt from this subpart.

40 CFR Part 63, Subpart PPPP – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products* is not applicable to the installation. This regulation is applicable to major HAP sources coating plastic parts and products such as plastic parts, products, or components of motor vehicle parts and accessories for automobiles, trucks, and recreational vehicles. [§63.4481(a) and (b)] The installation does perform surface coating of plastic products; however, the installation is an area source of HAPs.

40 CFR Part 63, Subpart WWWW – *National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel

coats that contain styrene. [§63.5785(a)] The permittee does not handle any compounds containing styrene.

40 CFR Part 63, Subpart MMMMM – *National Emission Standards for Hazardous Air Pollutants: Flexible Polyurethane Foam Fabrication Operations* is not applicable to the installation. This regulation is applicable to flexible polyurethane foam fabrication operations with flame lamination or a loop slitter at major HAP sources. [§63.8782(a)] The installation does perform flexible polyurethane foam fabrication; however, the installation is an area source of HAPs.

40 CFR Part 63, Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is not applicable to the installation. This regulation is applicable to paint stripping operations using methylene chloride (75-09-2), motor vehicle and mobile equipment spray-applied surface coating operations, and spray coating applications containing chromium, lead, manganese, nickel, or cadmium. [§63.11169(a) – (c)] The permittee does not use methylene chloride or any coatings containing the listed metal HAPs.

40 CFR Part 63, Subpart JJJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* is not applicable to the installation. The installation does operate a seven HP boiler; however, the boiler operates on electricity and is not an emission unit.

40 CFR Part 63, Subpart OOOOOO – *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources* is applicable to the installation and has been applied within this permit (see Permit Condition PW 2).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Other Regulatory Determinations

None

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

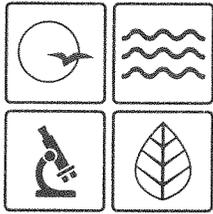
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 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 Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

No comments were received.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

MAY 01 2018

Mr. Todd Dooley
Woodbridge Corporation
11 Cermak Boulevard
St. Peters, MO 63376

Re: Woodbridge Corporation, 183-0129
Permit Number: OP2017-091

Dear Mr. Dooley,

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:bjj

Enclosures

c: PAMS File: 2016-08-003



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