MISSOURI
DEPARTMENT OF
NATURAL RESOURCES
Air Pollution Control Program

Draft

PART 70
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: MMYYYY-###
Expiration Date:
Installation ID: 159-0012
Project Number: 2017-12-021

Installation Name and Address
Waterloo Industries, Inc.
1500 Waterloo Drive
Sedalia, MO 65301
Pettis County

Parent Company's Name and Address
Stanley Black and Decker
1000 Stanley Drive
New Britain, CT 06053

Installation Description:

This facility manufactures metal storage products. Sheet metal is cut, formed, and spot-welded to form toolboxes, which are then cleaned and degreased. The toolboxes are painted using an electrodeposition and/or powder coat process. After being routed through a bake oven, the toolboxes are finished by attaching hardware such as nameplates, latches, handles, and locks. Packing materials for shipping the finished toolboxes are formed on-site using a process in which polystyrene beads are expanded and molded. The facility is a major source of Volatile Organic Compounds (VOCs).

Effective Date

Director or Designee
Department of Natural Resources

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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.

Emission Source	Description	Control Device
Maintenance Booths		
EP-31	Maintenance Paint Spray Booth, 0.00123 tons/hr	CD-8 (Filter)
Electrodeposition Coating Booths		
EP-45	Boiler for Electrodeposition Coating Products Parts Washer (natural gas), 19 MMBtu/hr (1998)	-
Powder Coating Booths		
EP-62	Boiler for Powder Coat Paint Spray Products Parts 8 Stage Washer , 5.25 MMBtu/hr (natural gas)	-
EP-64	Powder Coat Spray Booth 1, 0.05 tons/hr (2007)	CD-9 (Filter)
EP-65	Powder Coat Spray Booth 2, 0.0675 tons/hr (2007)	CD-10 (Filter)
EP-66	Powder Coat Spray Booth 3, 0.0425 tons/hr (2007)	CD-11 (Filter)
Emergency Engines		
EP-48	Emergency Generator (natural gas), 0.294MMBtu/hr, 26.82 HP (2012)	-

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Source	Description
Electrodeposition Coating Booths	
EP-23	Electrodeposition Coating Booth 1, 0.0428 tons/hr
EP-24	Electrodeposition Coating Booth 2, 0.0428 tons/hr
EP-34	Electrodeposition Coating Product Parts Washer, 0.02 gal/hr
EP-36	Electrodeposition Coating Booth 3, 0.0428 tons/hr
EP-37	Electrodeposition Coating Bake Oven 1, 0.055 tons/hr
EP-39	Electrodeposition Coating Bake Oven 2, 0.0055 tons/hr
EP-41	Electrodeposition Coating Bake Oven 3, 0.0055 tons/hr
EP-57	Electrodeposition Coating Booth 4, 0.0428 tons/hr (2007)
EP-60	(3) Electrodeposition Paint Storage Tanks (two 30,000 gal, one 24,500 gal)
Other Ovens and Burners	
EP-29	Air Make-up Burners (natural gas), 7.0 MMBtu/hr
EP-30	Other Burners (natural gas), 7.0 MMBtu/hr
EP-35	Electrodeposition Coating Dry-Off Oven (natural gas), 4.2 MMBtu/hr
EP-38	Electrodeposition Coating Bake Oven 1 Burner (natural gas), 3.15 MMBtu/hr
EP-40	Electrodeposition Coating Bake Oven 2 Burner (natural gas), 3.15 MMBtu/hr
EP-42	Electrodeposition Coating Bake Oven 3 Burner (natural gas), 3.15 MMBtu/hr
EP-43	Boiler for Expanded Polystyrene Line (natural gas), 8.4 MMBtu/hr
EP-53	Powder Coat Paint Spray Dry-Off Oven (natural gas), 2.4 MMBtu/hr (2007)
EP-56	Powder Coat Bake Oven 4 Burner (natural gas), 4.8 MMBtu/hr (2007)
EP-58	Paint Hook Burn Off Oven (natural gas), 0.875 MMBtu/hr (2007)
EP-59	Powder Coat Boiler (natural gas), 6.5 MMBtu/hr (2007)

Emission Source	Description
EP-61	Powder Coating Dry-Off Oven (2007)
EP-63	Powder Coating Bake Oven (2007)
EP-64a	Draw Oven – Tool & Die (natural gas), 0.00005 MMBtu/hr (2010)
EP-65a	Heat Treat Oven – Tool & Die (natural gas), 0.00018 MMBtu/hr (2010)
Expanded Polystyrene Process Equipment	
EP-15	Expanded Polystyrene Bead Expander, 0.14 tons/hr
EP-16	Expanded Polystyrene Injection Molder
EP-17	Expanded Polystyrene Injection Molder
EP-18	Expanded Polystyrene Injection Molder
EP-33	Expanded Polystyrene Injection Molder
EP-44	Expanded Polystyrene Injection Molder
EP-46	Expanded Polystyrene Bead Storage Vent, 0.0249 tons/hr (1983)
EP-47	Parts Washer, 0.00916 gal/hr (1977)

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. The following general conditions apply to all units contained in this permit, unless stated otherwise:

PERMIT CONDITION PW001
10 CSR 10-6.060 Construction Permits Required
Construction Permit 042009-016A, issued July 8, 2009

Emission Limitations

1) The permittee shall emit less than 250.0 tons of VOCs from the entire installation in any consecutive 12-month period. [Special Condition 2A]

Monitoring/Recordkeeping

1) The permittee shall monitor and record the monthly and consecutive 12 month total emissions for VOCs using Attachment A or an equivalent form approved by the Air Pollution Control Program to demonstrate compliance with the emission limitation. [Special Condition 2E]
2) The permittee shall keep all records for a minimum of five years and be made available to Department of Natural Resources' personnel upon request.
    a. The permittee shall include Material Safety Data Sheets (MSDS) for all materials used at the installation. [Special Condition 2E]

Reporting

1) The permittee shall submit all reports to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after any exceedance of any limitation established by this permit condition.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION PW002
10 CSR 10-6.060 Construction Permits Required
Construction Permit 042009-016A, issued July 8, 2009

Emission Limitations

1) The permittee shall emit less than 10.0 tons of individual HAPs and 25.0 tons combined HAPs from the entire installation in any consecutive 12-month period. [Special Condition 2D]

Alternative Material

1) When considering a HAP-containing paint or painting supply item that is different from those listed in Attachment B4, the permittee shall calculate the potential emissions for each individual HAP in

the alternative HAP-containing material (paint). Attachment B3 or an equivalent form shall be used to calculate the potential HAP emissions. If the calculated potential amount of emissions is equal to or greater than the Screen Modeling Action Levels (SMAL) for any chemical listed, then the permittee shall seek approval from the Air Pollution Control Program before use of the alternative paint/solvent. [Special Condition 2G]

Monitoring/Recordkeeping

1) The permittee shall monitor and record the monthly and consecutive 12 month total emissions for HAPs using Attachments B1 and B2 or equivalent forms approved by the Air Pollution Control Program to demonstrate compliance with the emission limitations. [Special Condition 2E]
2) The permittee shall maintain a copy of the most recent version of Missouri's SMALs. The most recent version of Missouri's SMALs is available at: http://www.dnr.mo.gov/env/apcp/docs/cphapsmaltbl6.pdf or can be requested from the Air Pollution Control Program's Permit Section by mailing: P.O. Box 176, Jefferson City, MO 65102.
3) The permittee shall keep all records for a minimum of five years and be made available to Department of Natural Resources' personnel upon request.
    a. The permittee shall include Material Safety Data Sheets (MSDS) for all materials used at the installation. [Special Condition 2E]

Reporting

1) The permittee shall submit all reports to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after any exceedance of any limitation established by this permit condition.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION PW003

10 CSR 10-6.060 Construction Permits Required
Construction Permit 042009-016A, issued July 8, 2009

Emission Limitations

1) The permittee shall emit less than 54.7 lbs of ethylene glycol monohexyl ether from the entire installation in any one day. [Special Condition 2B]
2) The permittee shall emit less than 4.3 tons of ethylene glycol monohexyl ether from the entire installation in any 12-month period. [Special Condition 2C]

Monitoring/Recordkeeping

1) The permittee shall monitor and record the daily, monthly, and consecutive 12 month total emissions for ethylene glycol monohexyl ether using Attachments C1 and C2 or equivalent forms approved by the Air Pollution Control Program to demonstrate compliance with the emission limitations. [Special Condition 2E]
2) The permittee shall keep all records for a minimum of five years and be made available to Department of Natural Resources' personnel upon request.
    a. The permittee shall include Material Safety Data Sheets (MSDS) for all materials used at the installation. [Special Condition 2E]

Reporting

1) The permittee shall submit all reports to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after any exceedance of any limitation established by this permit condition.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001 10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	
Emission Source	**Description**
EP-48	Emergency Generator (natural gas), 0.294MMBtu/hr, 26.82 HP (2012)

Emission Limitations

1) The permittee shall comply with the emission standard of 10 g/HP-hr of NO_x and HC. [Table 1 to Subpart JJJJ of 40 CFR Part 60]
2) The permittee shall comply with the emission standard of 387 g/HP-hr of CO. [Table 1 to Subpart JJJJ of 40 CFR Part 60]

Operational Limitations

1) The permittee shall operate and maintain the stationary SI ICE to achieve the emission standards required over the entire life of the engine. [§60.4234]
2) The permittee shall demonstrate compliance with the emission limitations and meet the following requirements: [§60.4243(a)]
   a) The permittee shall operate and maintain the certified stationary SI internal combustion engine according to the manufacturer's emission-related written instructions. [§60.4243(a)(1)]
   b) The permittee must keep records of conducted maintenance. [§60.4243(a)(1)]
   c) The permittee does not have to complete performance testing. [§60.4243(a)(1)]
   d) The permittee must meet the requirements as specified in 40 CFR part 1068, subparts A through D. [§60.4243(a)(1)]
   e) If the permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the stationary SI internal combustion engine will not be considered out of compliance. [§60.4243(a)(1)]
3) If the permittee does not operate and maintain the certified stationary SI internal combustion engine according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine, and the permittee must demonstrate compliance according to the following requirement: [§60.4243(a)(2)]
   a) The permittee must keep a maintenance plan and records of conducted maintenance to demonstrate compliance [§60.4243(a)(2)(i)]
   b) The permittee must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§60.4243(a)(2)(i)]
   c) The permittee does not have to complete performance testing. [§60.4243(a)(2)(i)]
4) The permittee must operate the emergency stationary ICE according to the requirements listed below. In order for the engine to be considered an emergency stationary ICE, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If the permittee does not operate the engine as

required, the engine will not be considered an emergency engine and must meet all requirements for non-emergency engines. [§60.4243(d)]

a) The permittee has no time limit on the use of emergency stationary ICE in emergency situations. [§60.4243(d)(1)]
b) The permittee may operate the emergency stationary ICE for 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. [§60.4243(d)(2)(i)]
    i) The permittee may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [§60.4243(d)(2)(i)]
c) The permittee may operate the emergency stationary ICE for up to 50 hours per calendar year in non-emergency situations. [§60.4243(d)(3)]
    i) The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. [§60.4243(d)(3)]
    ii) The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§60.4243(d)(3)]

5) The permittee may operate the stationary SI natural gas fired engine using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but the permittee must keep records of such use. [§60.4243(e)]
    a) If the permittee uses propane for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the permittee is required to conduct a performance test to demonstrate compliance with the emission standards of §60.4233. [§60.4243(e)]
6) If the permittee purchases a non-certified engine or the permittee does not operate and maintain the certified stationary SI internal combustion engine according to the manufacturer's written emission-related instructions, the permittee is required to perform initial performance testing, but the permittee is not required to conduct subsequent performance testing unless the stationary engine is rebuilt or undergoes major repair or maintenance. [§60.4243(f)]

Monitoring/Recordkeeping

1) The permittee must install a non-resettable hour meter upon startup of the permittee's emergency engine. [60.4237(c)]
    a) The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. [60.4245(b)]
    b) The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [60.4245(b)]
2) The permittee must keep records of the following information: [60.4245(a)]
    a) All notifications submitted to comply with 40 CFR Part 60, subpart JJJJ and all documentation supporting any notification. [60.4245(a)(1)]
    b) Maintenance conducted on the engine. [60.4245(a)(2)]
    c) Documentation from the manufacturer that the engine is certified to meet the emission standards. [60.4245(a)(3)]

d) If the certified engine is operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards. [60.4245(a)(4)]

3) The permittee shall keep all records for a minimum of five years and be made available to Department of Natural Resources' personnel upon request.

Reporting

1) The permittee shall report 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, no later than ten days after an exceedance of the emission limitation.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 002 10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart Dc – New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generators	
Emission Source	**Description**
Electrodeposition Coating Booths	
EP-45	Boiler for Electrodeposition Coating Product Parts Washer (natural gas); 19 MMBtu/hr

Recordkeeping

1) The permittee shall keep fuel supplier certifications. Fuel supplier certification shall include the following information: [§60.48c(f)(4)]
   a) The name of the supplier of the fuel; [§60.48c(f)(4)(i)]
   b) The potential sulfur emissions rate or maximum potential sulfur emissions rate of the fuel in ng/J heat input; and [§60.48c(f)(4)(ii)]
   c) The method used to determine the potential sulfur emissions rate of the fuel. [§60.48c(f)(4)(iii)]
2) The permittee shall record and maintain the following records: [§60.48c(g)]
   a) The amount of fuel combusted in each boiler during each operating day, or[§60.48c(g)(1)]
   b) The amount of fuel combusted in each boiler during each calendar month, or [§60.48c(g)(2)]
3) All records must be kept for a minimum of five years and be made available to Department of Natural Resources' personnel upon request.

Reporting

1) The permittee shall submit all reports to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after any exceedance of any limitation established by this permit condition.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 003 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants	
Emission Source	**Description**
Maintenance Booths	
EP-31	Maintenance Paint Spray Booth, 0.00123 tons/hr
Powder Coating Booths	
EP-64	Powder Coat Spray Booth 1, 0.05 tons/hr (2007)
EP-65	Powder Coat Spray Booth 2, 0.0675 tons/hr (2007)
EP-66	Powder Coat Spray Booth 3, 0.0425 tons/hr (2007)

Emission Limitation

1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]
2) Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 60 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]
3) Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

Monitoring

1) Monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
      i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
      ii) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
3) Observations are only required when the emission units are operating and when the weather conditions allow.
4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

Recordkeeping

1) The permittee shall maintain records of all observation results for each emission unit using Attachment D1 and Attachment D2 or equivalent forms.
2) The permittee shall retain all records for a minimum of five years and make these records available within a reasonable period of time for inspection to the Department of Natural Resources' personnel upon request.

Reporting

1) The permittee shall report 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, no later than ten days after an exceedance of the emission limitation.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

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 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 make such permit available within a reasonable period of time to any Missouri Department of Natural Resources personnel upon request.

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 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.

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. 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 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.

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,

Permit Duration
10 CSR 10-6.065(5)(C)1.B, 10 CSR 10-6.065(5)(E)3.C
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.

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

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 available within a reasonable period of time 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 or AirComplianceReporting@dnr.mo.gov.
   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.
   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 (5)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice

must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

Risk Management Plan Under Section 112(r)
10 CSR 10-6.065(5)(C)1.D

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.

Severability Clause
10 CSR 10-6.065(5)(C)1.F

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.

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

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(5)(C)1.

Incentive Programs Not Requiring Permit Revisions
10 CSR 10-6.065(5)(C)1.H
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.

Reasonably Anticipated Operating Scenarios
10 CSR 10-6.065(5)(C)1.I
The permittee has the option to use alternate materials for spray painting as outlined in Permit Condition PW002.

Compliance Requirements
10 CSR 10-6.065(5)(C)3
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 Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region 7, 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 or AirComplianceReporting@dnr.mo.gov. 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.

Permit Shield
10 CSR 10-6.065(5)(C)6

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.

Emergency Provisions
10 CSR 10-6.065(5)(C)7

1) An emergency or upset as defined in 10 CSR 10-6.065(5)(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.

Operational Flexibility
10 CSR 10-6.065(5)(C)8

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 or AirComplianceReporting@dnr.mo.gov, as well as Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region 7, 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 or AirComplianceReporting@dnr.mo.gov, as well as Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region 7, 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.

Off-Permit Changes
10 CSR 10-6.065(5)(C)9

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 permit, 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 or AirComplianceReporting@dnr.mo.gov, as well as Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region 7, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(5)(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.

Responsible Official
10 CSR 10-6.020(2)(R)34
The application utilized in the preparation of this permit was signed by Edward Roma, Operations Director. 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.

Reopening-Permit for Cause
10 CSR 10-6.065(5)(E)6
This permit shall be reopened for cause if:
1) The Missouri Department of Natural Resources (MoDNR) 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) MoDNR 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) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

Statement of Basis
10 CSR 10-6.065(5)(E)1.C
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 Compliance Worksheet

This sheet covers the month of _____ in the year _____.

Coating Material Used (Name, Type)	Monthly Amount of Material Used (gal)	Density (lb/gal)	VOC Content[1] (wt%)	Monthly VOC Emissions[2] (tons)
Emission Source	**Monthly Throughput ($mmft^3$)**	**Emission Factor ($lb/mmft^3$)**	**Source (SCC)**	**Monthly VOC Emissions[3] (tons)**
Emergency Generator EP-48		0.0116	20300201	
All Other Natural Gas Usage[4]		5.5	10200603, 10200602	
Emission Source	**Polystyrene Manufactured (lb)**	**Emission Factor (lb VOC/ton Product)**	**Source (SCC)**	**Monthly VOC Emissions[5] (tons)**
Polystyrene Production		4.88	30800801	
Monthly Sum of VOC Emissions (tons)[6]:				
12-Month Consecutive Total VOC Emissions (tons)[7]:				

[1] If a range of VOC content is given, use the largest value in the range
[2] [Monthly Amount of Material Used] × [Density] × [VOC Content] / 2000 = [Monthly VOC Emissions]
[3] [Monthly Throughput] × [Emission Factor] / 2000 = [Monthly VOC Emissions]
[4] Emission Sources: EP-29, 30, 35, 38, 40, 42, 43, 45, 53, 56, 58, 59, 62, 64a, and 65a.
[5] [Polystyrene Manufactured] × [Emission Factor] / 2000 = [Monthly VOC Emissions]
[6] Monthly Sum of VOC emissions (tons) = the sum of each emission sources VOC emissions (tons). The installation is required to include start-up, shutdown, and malfunction (SSM) combined HAP emissions as reported to the Air Pollution Control Program's Compliance and Enforcement section for compliance with 10 CSR 10-6.050.
[7] 12-Month Consecutive Total VOC Emissions = the sum of the 12 most recent Monthly Sum of VOC Emissions. 12-Month Consecutive Total VOC Emissions of less than 250.0 tons indicates compliance.

Attachment B1
Monthly Combined HAPs Tracking Record

This sheet covers the month of _____ in the year _____.

Coating Material Used (Name, HAP, CAS #)	Monthly Amount of Material Used (include units)	Density (lb/gal)	Combined HAP Content[8] (weight %)	Monthly Combined HAP Emissions[9] (tons)
Emission Point & Description	**Monthly Throughput**	**Combined HAP Emission Factor (lb/mmcf)**	**Source (SCC)**	**Monthly Combined HAP Emissions (tons)**
Emergency Generator EP-48	mmcf	0.0324	20300201	
All Other Natural Gas Usage[4]	mmcf	1.8885	10200602 & 10200603	
Monthly Combined HAP Emissions (tons)[10]:				
12-Month Rolling Total Combined HAP Emissions (tons)[11]:				

[8] Combined HAP content should be obtained from the SDS sheet as the sum of all individual HAP contents. If a range of individual HAP contents is given, use the largest value in the range.
[9] If usage is in tons: [Amount of Material Used] × [HAP Content] = [HAP Emissions]
If usage is in pounds: [Amount of Material Used] × [HAP Content] / [2000 lb/ton] = [HAP Emissions]
If usage is in gallons: [Amount of Material Used] × [Density] × [HAP Content] / [2000 lb/ton] = [HAP Emissions]
[10] Monthly Combined HAP emissions (tons) = the sum of each emission sources Monthly Combined HAP emissions (tons). The installation is required to include start-up, shutdown, and malfunction (SSM) combined HAP emissions as reported to the Air Pollution Control Program's Compliance and Enforcement section for compliance with 10 CSR 10-6.050.
[11] 12-Month Rolling Total Combined HAP Emissions = the sum of the 12 most recent Monthly Combined HAP Emissions. 12-Month Rolling Total Combined HAP Emissions of less than 25.0 tons indicates compliance.

Attachment B2
Monthly Individual HAP Tracking Record

This sheet covers the month of _____ in the year _____.

HAP Name: _____
CAS No.: _____

Coating Material Used (Name, HAP, CAS #)	Monthly Amount of Material Used (include units)	Density (lb/gal)	Individual HAP Content[12] (weight %)	Monthly Individual HAP Emissions[13] (tons)

Emission Point & Description	Monthly Throughput	Individual HAP Emission Factor (lb/mmcf)[14]	Source (SCC)	Monthly Individual HAP Emissions (tons)
Emergency Generator EP-48	mmcf		20300201	
All Other Natural Gas Usage[4]	mmcf		10200602 & 10200603	
Monthly Individual HAP Emissions (tons)[15]:				
12-Month Rolling Total Individual HAP Emissions (tons)[16]:				

[12] Individual HAP content should be obtained from the SDS sheet. If a range of individual HAP contents is given, use the largest value in the range.
[13] If usage is in tons: [Amount of Material Used] × [HAP Content] = [HAP Emissions]
If usage is in pounds: [Amount of Material Used] × [HAP Content] / [2000 lb/ton] = [HAP Emissions]
If usage is in gallons: [Amount of Material Used] × [Density] × [HAP Content] / [2000 lb/ton] = [HAP Emissions]
[14] The permittee shall obtain HAP emission factors from Attachment B5.
[15] Monthly Individual HAP emissions (tons) = the sum of each emission sources Monthly Individual HAP emissions (tons). The installation is required to include start-up, shutdown, and malfunction (SSM) combined HAP emissions as reported to the Air Pollution Control Program's Compliance and Enforcement section for compliance with 10 CSR 10-6.050.
[16] 12-Month Rolling Total Individual HAP Emissions = the sum of the 12 most recent Monthly Individual HAP Emissions. 12-Month Rolling Total Individual HAP Emissions of less than 10.0 tons indicates compliance.

Attachment B3
Alternative Materials HAP Calculation Sheet

HAP (Name, CAS)	Material Used (Name, Type)	Maximum Application Rate[17] (gal/hr)	Density (lb/gal)	Individual HAP Content[18] (Wt%)	Individual HAP PTE[19] (Ton/yr)	Screen Modeling Action Level[20] (Ton/yr)

[17] Maximum application rate of the spray gun(s) that shall be used for the new material.
[18] From the SDS. If a range is given, use the maximum in the range.
[19] [Maximum Application Rate] × [Density] × [Individual HAP Content] × [4.38] = [Individual HAP PTE]. Compare potential emissions of the individual HAP in [Individual HAP PTE] to those from [Screen Modeling Action Level]. **If [Individual HAP PTE] is greater than [Screen Modeling Action Level], the permittee shall get permission from the Air Pollution Control program before using the new material.**
[20] Screen Modeling Action Levels for individual HAPs can be found in the SMAL table: https://dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf

Attachment B4
Existing HAP Materials in Use

HAP Containing Material (Paint, Paint supplies, etc.)	Vendor Code	HAP Containing Material (Paint, Paint supplies, etc.)	Vendor Code
DPC-36, Vanblend	UNI	M-25271 Rally Black Powder Paint	VAL
M-14318 Platinum - Trimite	TRI	Acrylic Enamel Reducer 8034S	DPT
M-15713 Fir Green	VAL	Dover White Enamel	DPT
M-15853 TGIC Rally Black Powder	VAL	Vectrocoat 300 Red	VAL
M-16368 Midnight Blue Powder	VAL	Flat Black Enamel	SWC
M-25270 Red TGIC Powder	VAL	Mint Green Enamel	SWC
Aeromatic 150 Solvent	UNI	Off White Enamel	SWC
Chemsolv DB	CII	OSHA Yellow Enamel	SWC
M-13502 Iron Blue	ACC	Press Blue Enamel	SWC
M-15756 High Gloss Midnight Blue	ACC	Slate Gray Centeri 6334a	DPT
M-6021 Silver Grey Metallic	VAL	Varitemp Enamel Reducer 3864S-5	DPT
ChemSolv EB	CII	Vectrocoat 330 Midnight Blue	VAL
Diisopropanolamine LFG 85	UNI	Vectrocoat 330 Red	VAL
DMEA	UNI	M-13900 Red Powder Coat	VAL
Vectrocoat 300 Black	VAL	M-14316 Cobalt Blue Power Paint	TRI
Ethyl Hexyl Alcohol	UNI	M-14317 Charcoal Powder	VAL
Formaldehyde	UNI	M-15238 High Gloss Rally Black Powder	VAL
Propyl Propasol P	CII	M-15338 Iron Blue Powder	VAL
Vectrocoat 330 Black	VAL	M-25093 PT Blue Powder	VAL
Vectrocoat 330 Clear	VAL	Hexyl Cellosolve Solvent	DOW

Attachment B5
HAP Emission Factors

The permittee shall use the following emission factors in Attachment B2.

Table 1: HAPs for Natural Gas Usage (SCC 10200602 & 10200603)	
HAP	**Emission Factor (lb/mmcf)**
2-Methylnaphthalene (91-57-6)	2.4E-05
3-Methylchlorantherene (56-49-5)	1.8E-06
7,12-Dimethylbenz(a)anthracene (56-49-5)	1.6E-05
Acenaphthene (83-32-9)	1.8E-06
Acenaphthylene (203-96-8)	1.8E-06
Anthracene (120-12-7)	2.4E-06
Benz(a)anthracene (56-55-3)	1.8E-06
Benzene (71-43-2)	2.1E-03
Benzo(a)pyrene (50-32-8)	1.2E-06
Benzo(b)fluoranthene (205-99-2)	1.8E-06
Benzo(g,h,i)perylene (191-24-2)	1.2E-06
Benzo(k)fluoranthene (207-08-9)	1.8E-06
Chrysene (218-01-9)	1.8E-06
Dibenzo(a,h)anthracene (53-70-3)	1.2E-03
Fluoranthene (206-44-0)	3.0E-06
Fluorene (86-73-7)	2.8E-06
Formaldehyde (50-00-0)	7.5E-02
Hexane (110-54-3)	1.8E+00
Indeno(1,2,3-cd)pyrene (193-39-5)	1.8E-06
Naphthalene (91-20-3)	6.1E-04
Phenanathrene (85-01-8)	1.7E-05
Pyrene (129-00-0)	5.0E-06
Toluene (108-88-3)	3.4E-03

Table 2: HAPs for EP-48 Emergency Generator (SCC 20300201)	
HAP	**Emission Factor (lb/mmcf)**
1,1,2,2,-Tetrachloroethane (79-34-5)	2.53E-05
1,1,2-Trichloroethane (79-00-5)	1.53E-05
1,3-Butadiene (106-99-0)	6.63E-04
1,3-Dichloropropene (542-75-6)	1.27E-05
Acetaldehyde (75-07-0)	2.79E-03
Acrolein (107-02-8)	2.63E-03
Benzene (71-43-2)	1.58E-03
Carbon Tetrachloride (56-23-5)	1.77E-05
Chlorobenzene (108-90-7)	1.29E-05
Chloroform (67-66-3)	1.37E-05
Ethylbenzene (100-41-4)	2.48E-05
Ethylene Dibromide (106-93-4)	2.13E-05
Formaldehyde (50-00-0)	2.05-E02
Methanol (67-56-1)	3.06E-03
Methylene Chloride (75-09-2)	4.12E-05
Naphthalene (91-20-3)	9.71E-05
PAHs	1.41E-04
Styrene (100-42-5)	1.19E-05
Toluene (108-88-3)	5.58E-04
Vinyl Chloride (75-01-4)	7.18E-06
Xylene (95-47-6)	1.95E-04

Attachment C1

Daily Ethylene Glycol Monohexyl Ether Tracking Record

This sheet covers the month of _____ in the year _____.

Date (Month / Day)	Name of Material Used	Amount of Material Used (gal)	Density of Material (lb/gal)	Ethylene Glycol Monohexyl Ether Content (Wt%)	Daily Ethylene Glycol Monohexyl Ether Emissions[21] (lb)

[21] [Daily HAP Emissions (tons)] = [Amount of Material Used (gal)] × [Density (lb/gal)] × [HAP Content (wt%)]. The installation is required to include start-up, shutdown, and malfunction (SSM) emissions as reported to the Air Pollution Control Program's Compliance and Enforcement section for compliance with 10 CSR 10-6.050. **Having a daily ethylene glycol monohexyl ether emissions of less than 54.7 pounds indicates compliance.**

Attachment C2
Monthly Ethylene Glycol Monohexyl Ether Tracking Record

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

Month, Year	Monthly Ethylene Glycol Monohexyl Ether Emissions[22] (tons)	12-Month Consecutive Total Ethylene Glycol Monohexyl Ether Emissions[23] (tons)

[22] Enter the total monthly ethylene glycol monohexyl ether emissions, which is the sum of the emissions calculated on Attachment C1 for the appropriate month and convert to tons.

[23] Add the monthly emissions of the current month to the sum of the monthly emissions of the previous eleven months. The installation is required to include start-up, shutdown, and malfunction (SSM) emissions as reported to the Air Pollution Control Program's Compliance and Enforcement section for compliance with 10 CSR 10-6.050. **A total of less than 4.3 tons indicates compliance.**

Attachment D1
Visible Emission Observations

Method 22 Visible Emissions Observations	
Installation Name	Observer Name
Location	Date
Sky Conditions	Wind Direction
Precipitation	Wind Speed
Time	Emission unit
Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.	

Minute	Seconds				Comments
	0	15	30	45	
	Visible Emissions Yes (Y) or No (N)				
0					
1					
2					
3					
4					
5					
6					

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.

Attachment D2

Method 9 Opacity Observations		
Installation Name:	Sketch of the observer's position relative to the emission unit	
Emission Point:		
Emission Unit:		
Observer Name and Affiliation:		
Observer Certification Date:		
Method 9 Observation Date:		
Height of Emission Point:		
Time:	Start of observations	End of observations
Distance of Observer from Emission Point:		
Observer Direction from Emission Point:		
Approximate Wind Direction:		
Estimated Wind Speed:		
Ambient Temperature:		
Description of Sky Conditions (Presence and color of clouds):		
Plume Color:		
Approximate Distance Plume is Visible from Emission Point:		

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

This facility manufactures metal storage products. Sheet metal is cut, formed, and spot-welded to form toolboxes, which are then cleaned and degreased. The toolboxes are painted using an electrodeposition and/or powder coat process. After being routed through a bake oven, the toolboxes are finished by attaching hardware such as nameplates, latches, handles, and locks. Packing materials for shipping the finished toolboxes are formed on-site using a process in which polystyrene beads are expanded and molded. The facility is a major source of Volatile Organic Compounds (VOCs).

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

Pollutants	PTE[24]	2017	2016	2015	2014	2013
Particulate Matter ≤ Ten Microns (PM_{10})	3.66	0.77	0.57	0.64	1.03	0.49
Particulate Matter ≤ 2.5 Microns ($PM_{2.5}$)	3.66	0.77	0.57	0.64	1.03	0.49
Sulfur Oxides (SO_x)	1.60	0.05	0.04	0.40	0.08	0.03
Nitrogen Oxides (NO_x)	42.83	9.26	6.26	5.89	12.89	5.66
Volatile Organic Compounds (VOCs)	< 250	40.38	38.54	33.93	32.42	31.91
Carbon Monoxide (CO)	12.19	7.78	5.26	4.95	10.83	4.76
Hazardous Air Pollutants[25] (HAPs)	< 10/25	2.18	1.76	1.85	1.85	1.86
Ethylene Glycol Monohexyl Ether (112-25-4)	< 4.3	2.09	1.65	1.79	1.79	1.79
Glycol Ethers (112-25-4)	< 10	0.01	0.01	0.01	0.01	0.01
Methyl Alcohol (67-56-1)	< 10	0.07	0.10	0.04	0.04	0.04

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 8, 2017;
2) 2016 Emissions Inventory Questionnaire, received March 24, 2017;

[24] Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. The PTE values were obtained from CP042009-016A.
[25] HAPs under 0.01 ton/yr not listed.

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) All construction permits listed in Construction Permit History.

Construction Permit History

Construction Permit 0489-003, issued April 14, 1989
This permit was issued for the construction of a Binks dry filter paint booth. It contains 7 special conditions. It contains operational limitations that have been superseded by limitations in Construction Permit 042009-016A.

Construction Permit 0987-004, issued September 29, 1987
Construction Permit 0987-004A, issued March 2, 1990
This permit was issued for the construction and operation of a controlled pyrolysis furnace. It contains 1 special condition. The amendment was issued to allow the burning of the polyester filter material in the pyrolysis furnace. It contains operational limitations that have been superseded by limitations in Construction Permit 042009-016A.

Construction Permit 0890-005, issued August 10, 1990
This permit was issued for the installation of a maintenance paint booth – dry filter operation. It contains 4 special conditions. It contains gallon and paint density limitations that have been superseded by limitations in Construction Permit 042009-016A.

Construction Permit 1294-003, issued December 2, 1994
This permit was issued for the installation of a new paint system. It contains 4 special conditions that apply to emission points that no longer exist at the installation. Because the emission points have been removed, none of the conditions are currently applicable to the installation. As a result, none of the special conditions have been included into this operating permit.

Construction Permit 0797-031, issued July 30, 1997
This permit was issued for the construction of an expanded polystyrene (EPS) bead expander (EP15), four EPS injection molders (EP16, EP17, EP18, and EP33), and forty-two natural gas-fired infrared heaters (EP26 and EP28) to allow more time for paint to cure at two existing bake ovens. It contains no special conditions.

Construction Permit 0897-012, issued August 12, 1997
This permit was issued for the replacement of one products washer, one dry-off oven, and two bake ovens, and for the addition of one electrodeposition dip tank and one bake oven. It contains emission limitations that have been superseded by newer emission limitations in Construction Permit 042009-016A.

Construction Permit 0699-014, issued June 8, 1999
This permit was issued to increase the capacity of an existing expanded polystyrene bead expander (EPS), to install a new polystyrene injection molder, and replace the existing 4.18 MMBtu/hr boiler (EP-14) with a new natural gas fired 8.4 MMBtu/hr boiler (EP-43). It contains emission limitations that have been superseded by newer emission limitations in Construction Permit 042009-016A.

Construction Permit 0699-014A, issued May 23, 2006

This amendment was issued in order to add HAP limitations to the entire installation. It contains emission limitations that have been superseded by newer emission limitations in Construction Permit 042009-016A.

Construction Permit 112006-013, issued November 22, 2006

This permit was for the installation of an electrodeposition coating booth, a 4.8 MMBtu/hr dual-fueled coating bake oven, and three electrodeposition coating paint storage tanks. It contains emission limitations that have been superseded by newer emission limitations in Construction Permit 042009-016A.

Construction Permit 042009-016, issued April 29, 2009

This permit was issued to take in account a new solvent being used in the E-coat paint booths. It contains emission limitations that have been superseded by newer emission limitations in Construction Permit 042009-016A.

Construction Permit 042009-016A, issued July 8, 2009

This amendment was issued to correct ethylene glycol monohexyl ether limitations after re-evaluating modeling done to the installation after the annual average concentration exceeded the 24-hour RAL. Modeling was redone for ethylene glycol monohexyl, resulting in new emission limitations. This permit supersedes all special conditions of Construction Permit 042009-016 and any other previous emission limitations.

- Special Condition 1 supersedes Special Condition 2 from Construction Permits 0699-014 and 0699-014A.
- Special Condition 2 limits the emissions of VOCs, HAPs, and ethylene glycol monohexyl ether with recordkeeping requirements. It also gives an alternative material option.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart Dc – *Small Industrial-Commercial-Institutional Steam Generating Units*

This subpart applies to EP-45 due to it having a heat capacity over 10 MMBtu/hr and less than 100 MMBtu/hr as required by §60.40c. The other boilers are not subject due to having a heat capacity below 10 MMBtu/hr.

40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*

This subpart does not apply. This subpart applies to tanks with a design capacity greater than 19,800 gallons used to store volatile organic liquids with a vapor pressure of 15 kPa or more, per §60.110b(a) and §60.110b(b). The 30,000 gallon electrodeposition coating storage tank stores paint with a vapor pressure below 15 kPa according to the operating permit application. 40 CFR Part 60, Subpart Kb does not apply to the 30,000 gallon electrodeposition because it stores a material with a vapor pressure below 15 kPa.

40 CFR Part 60, Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*

This subpart applies to the emergency generator EP-48 as required by 40 CFR Part 63, Subpart ZZZZ. See 40 CFR Part 63, Subpart ZZZZ for more details.

Maximum Achievable Control Technology (MACT) Applicability

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

This subpart does not apply. This subpart only applies to solvent cleaning process that containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The installation does not use any of these in the required concentrations.

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

This subpart does not apply. This subpart only applies to major sources of HAPs, according to §63.3881(b). The installation took a plant-wide de minimis HAP limit in Construction Permit 0699-014A (superseded by 042009-016A), issued May 24, 2006, prior to the compliance date of July 2, 2007. The installation is an area source of HAPs.

40 CFR Part 63, Subpart ZZZZ – *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

This subpart applies to emergency generator EP-48 because it is a stationary RICE at an area source of HAPs as required by §63.6585. However, according to §63.6590(c)(1), since the engine is new and located at an area source, the requirements of the subpart will be met by compiling with 40 CFR part 60 JJJJ.

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*

This subpart does not apply. This subpart only applies to boilers or process heaters at facilities that are a major source of HAPs, as stated in §63.7485. Construction Permit 042009-016A limited the installation to emit less than de minimis levels of HAPs before the subpart's effective date of January 31, 2013. This installation is an area source of HAPs due to HAP limitations; it is not a major 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*

This subpart does not apply. In order for this subpart to apply, the installation would have to meet any of the requirements found in §63.11170. The installation does not perform paint stripping using MeCl, as described in §63.11170(a)(1). The installation's coatings do not contain the target HAPs: compounds of chromium, lead, manganese, nickel, or cadmium required in §63.11170(a)(2) and §63.11170(a)(2). If the installation uses alternative material containing these HAPs, they may become subject to this subpart.

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

This subpart does not apply. This subpart applies to boilers in area sources of HAPs. The installation is an area source of HAPs; however, all the boilers at the installation are gas-fired boilers are defined by this subpart, which are exempt from this subpart according to §63.11195(e).

40 CFR Part 63, Subpart XXXXXX – *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*

This subpart does not apply. The NAICS 332439 category of "tool boxes, light gauge metal, manufacturing" is not one of the nine metal fabrication and finishing source categories covered by this subpart.

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.

Greenhouse Gas Emissions

Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO_2 emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO_2 emissions were not included within this permit. If applicable, the applicant is required to report the data directly to EPA. The public may obtain CO_2 emissions data for applicable installations by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Missouri Code of State Regulations (CSR) Applicability

10 CSR 10-6.100, *Alternate Emission Limits*

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

10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*
This rule applies. However, monitoring and recordkeeping is not required. The installation emits particulate matter in low quantities. Visible emissions beyond the boundaries are not expected.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*
This rule applies and has been incorporated into the operating permit to applicable paint booths EP-31, 64, 65, and 66.

EP-23, 24, 36, and 57 are e-coat booths. The coatings are not spray applied, material is dipped in the booth instead. As a result, particulate matter from these processes is not aerosolized into the air. No particulate matter emissions are expected from the e-coat booths.

Natural gas fired units are exempt from this rule per 10 CSR 10-6.220(1)(L).

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds
This rule is not applicable because the combustion units exclusively use natural gas or liquefied petroleum gas and are exempt per 10 CSR 10-6.260(1)(A)(2).

10 CSR 10-6.261 Control of Sulfur Dioxide Emissions
Missouri's SIP has not adopted this regulation; therefore, this regulation is a state only requirement. Upon adoption into Missouri's SIP this regulation will be both a state and federal requirement.

The combustion units only combust natural gas and are except from this rule per (l)(A), an individual unit fueled exclusively with natural gas or liquefied petroleum gas is exempt from this rule. [6.261(1)(A)]

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
This rule does not apply. EP-31, 64, 65, and 66 are exempt from the rule due to the fact that these pieces of equipment were exempt from construction permitting under 10 CSR 10-6.061. [10 CSR 10-6.400(1)(B)(8)]

EP-23, 24, 36, and 57 are e-coat booths. The coatings are not spray applied, material is dipped in the booth instead. As a result, particulate matter from these processes is not aerosolized into the air. Particulate matter emissions are not expected from the e-coat booths.

The natural gas burners, ovens, and emergency generator do not meet the definition of process weight and thus this rule is not applicable to them.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating*
This rule does not apply. All combustion equipment is fueled solely by natural gas or a combination of natural gas and LPG and thus exempt per 10 CSR 10-6.405(1)(E).

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

We received comments from Bob Cheever on January10, 2019. The comments are addressed in the order in which they appear within the letter(s).

Comment #1:

First, Permit Condition 004 specifies Operational Limitations, Monitoring/Record keeping, and Reporting requirements associated with particulate matter from one Maintenance Paint Spray Booth (Emission Source EP-31) and three Powder Coat Spray Booths (Emission Sources EP-64, EP-65 and EP-66). Permit Condition 004 indicates the citation for origin and authority for these requirements is 10 CSR 10-6.065-Operating Permits. Operating permits issued pursuant to 10 CSR 10-6.065 shall contain all applicable requirements under 40 CFR Part 60, Part 61, Part 63, SIP Requirements or other federally-enforceable permits such as preconstruction permits. Operating permits are for collecting all applicable requirements into a single document and are not a vehicle for establishing new permit conditions. Therefore, it appears to the EPA that the citation for origin and authority for Permit Condition 004 is incorrect, and a more appropriate citation might be 10 CSR 10-6.400, Restriction of Emissions of Particulate Matter from Industrial Processes. However, 10 CSR 10-6.400(B)8 says "the provisions of this rule shall not apply to emission sources that are exempt from construction permitting under 10 CSR 10-6.061." In a "No Construction Permit Required" letter, dated January 2015, the MoDNR informed Waterloo Industries, Inc., that "all of the equipment in the powder paint system meets one of the exemptions listed in 10 CSR 6.061." Therefore, it appears to the EPA that the requirements in Permit Condition 004 may not be applicable, and the EPA recommends the MoDNR to reconsider inclusion of Permit Condition 004 in the Waterloo Industries, Inc Part 70 Operating Permit.

Response to Comment:

MoDNR agrees with the comments and has removed Permit Condition 004 from the permit and amended the Statement of Basis to reflect this.

Comment #2:

Second, Permit Condition 001 incorporates requirements from 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, applicable to Emission Source EP-48. Emission source EP-48 is described as an "Emergency Generator." Emergency generators, subject to 40 CFR Part 60, Subpart JJJJ are powered by internal combustion engines which are the source of the emissions being controlled and the emission limitations are specified in units of g/HP-hr. Therefore, it would appear to be more appropriate to describe the engine, including the horsepower, in lieu of or in addition to providing the generator specifications in the emission unit description. The EPA recommends the MoDNR consider the addition of engine information in the emission source description of Permit Condition 001.

Response to Comment:

MoDNR agrees with the comments and has amended the engine description to include horsepower.

Comment #3:

Third, in the Missouri Code of State Regulations (CSR) Applicability section of the Statement of Basis, the MoDNR indicates the Waterloo Industries, Inc combustion units are exempt from 10 CSR 10-6.261, Control of Sulfur Dioxide Emissions, because their units are fueled exclusively with natural gas or liquefied petroleum gas. However, this same section of the Statement of Basis does not explain the absence of potentially applicable requirements pursuant to 10 CSR 10-6.260, Restriction of Emissions of Sulfur Compounds. 10 CSR 10-6.065 (5)(C)l requires every operating permit issued to contain all requirements applicable to the installation at the time of issuance. 10 CSR 10-6.020(A)54A defines applicable requirements to include any standard or requirement provided for in the implementation plan approved and promulgated by the EPA State Implementation Plan (SIP). 10 CSR 10-6.260 is included in the Missouri SIP, and therefore, is an applicable requirement to be included in the operating permit. The EPA recognizes that Waterloo Industries, Inc. may be exempt from the requirements of 10 CSR 10-6.260. However, the EPA encourages the MoDNR to include 10 CSR 10-6.260 as an applicable requirement.

Response to Comment:

MoDNR agrees and has reviewed the applicability of 10 CSR 10-6.260 to the installation. It was determined that 10 CSR 10-6.260 was not applicable and this is reflected in the Statement of Basis.

Comment #4:

Finally, plant wide Permit Condition PW003 establishes daily and 12-month continuous limitations on emissions of ethylene glycol monohexyl ether. Permit Condition PW003 also requires Attachments Cl and C2, or approved equivalent forms, for recording daily, monthly and consecutive 12-total emissions of Volatile Organic Compounds (VOCs)(emphasis added). However, Attachments Cl and C2 are more accurately titled "Daily Ethylene Glycol Monohexyl Ether Tracking Record" and "Monthly Ethylene Glycol Monohexyl Ether Tracking Record," respectively. The EPA suggests the MoDNR consider replacing VOCs with Ethylene Glycol Monohexyl Ether in the Monitoring/ Record keeping requirement 1 in Permit Condition PW003.

Response to Comment:

MoDNR agrees and has amended the Monitoring/Recordkeeping requirement to read “Ethylene Glycol Monohexyl Ether” as opposed to “VOC”