Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

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

Operating Permit Number: **OP2010-049**
Expiration Date: JUN 03 2015
Installation ID: 047-0075
Project Number: 2007-01-013

Installation Name and Address
Tnemec Company, Inc.
123 West 23rd Avenue
North Kansas City, MO 64116
Clay County

Parent Company's Name and Address
Tnemec Company, Inc.
6800 Corporate Drive
Kansas City, MO 64120

Installation Description:
Tnemec Company, Inc. manufactures specialty high performance paints and coatings in North Kansas City, Missouri. Batch process operations include raw material storage and conveying, milling, wetting in of dry raw materials, product mixing, product tinting and product packaging. Solvent is used to clean most production equipment and the installation operates a still to recover and reuse the cleaning solvents. The installation has limited volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions to remain below the major source level.

JUN 04 2010
Effective Date

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Tnemec Company, Inc. manufactures specialty high performance paints and coatings in North Kansas City, Missouri. Batch process operations include raw material storage and conveying, milling, wetting in of dry raw materials, product mixing, product tinting and product packaging. Solvent is used to clean most production equipment and the installation operates a still to recover and reuse the cleaning solvents. The installation has limited volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions to remain below the major source level.

The installation uses a variety of mixers and process tubs. The majority of the production equipment is vented through one emission point, with the exception of one solids mixer that is located in a different building. At the time of permit issuance, the facility is operating a vapor extraction system to remediate historic solvent contamination which also exhausts through a separate emission point.

The following table lists the emissions reported by the installation in the Emissions Inventory Questionnaire (EIQ) for the most recent five years.

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO_x)	Nitrogen Oxides (NO_x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs) [1]
2008	3.22	--	--	--	14.34	--	--	5.76
2007	2.83	--	--	--	13.64	--	--	5.75
2006	3.04	--	--	--	15.67	--	--	7.40
2005	2.98	--	--	--	15.51	--	--	7.48
2004	3.05	--	--	0.60	17.05	--	--	8.31

[1] HAP emissions are included in VOC total emissions.

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 Unit #	Description of Emission Unit	Emission Point No.
EU0010	Miscellaneous Natural Gas Equipment: Boiler #1	EP03
EU0020	Miscellaneous Natural Gas Equipment: Boiler #2	EP03
EU0030	Miscellaneous Natural Gas Equipment: Boiler #3	EP03
EU0050	Miscellaneous Natural Gas Equipment: Air Make Up Heating Unit #1	EP05
EU0055	Miscellaneous Natural Gas Equipment: Air Make Up Heating Unit #2	EP05
EU0060	Miscellaneous Natural Gas Equipment: Space Heater HV-1, New Warehouse	EP26
EU0065	Miscellaneous Natural Gas Equipment: Space Heater HV-2, New Warehouse	EP26
EU0070	Miscellaneous Natural Gas Equipment: Space Heater HVAC-1, New Warehouse	EP26
EU0075	Miscellaneous Natural Gas Equipment: Space Heater HVAC-2, New Warehouse	EP26

Emission Unit #	Description of Emission Unit	Emission Point No.
EU0080	Miscellaneous Natural Gas Equipment: Space Heater HVAC-3, New Warehouse	EP26
EU0085	Miscellaneous Natural Gas Equipment: Space Heater HVAC-4, New Warehouse	EP26
EU0090	Miscellaneous Natural Gas Equipment: Space Heater HVAC-5, New Warehouse	EP26
EU0095	Miscellaneous Natural Gas Equipment: Space Heater HVAC-6, New Warehouse	EP26
EU0100	Miscellaneous Natural Gas Equipment: Space Heater HVAC-7, New Warehouse	EP26
EU0105	Miscellaneous Natural Gas Equipment: Space Heater HVAC-7A, New Warehouse	EP26
EU0110	Miscellaneous Natural Gas Equipment: Space Heater HV-3, West Dock Area	
EU0115	Miscellaneous Natural Gas Equipment: Space Heater HV-4, West Dock Area	
EU0120	Miscellaneous Natural Gas Equipment: Space Heater HV-5, West Dock Area	
EU0125	Miscellaneous Natural Gas Equipment: Space Heater HV-6, Middle Building	
EU0130	Miscellaneous Natural Gas Equipment: Space Heater HV-7, Middle Building	
EU0135	Miscellaneous Natural Gas Equipment: Space Heater HV-8, Middle Building	
EU0140	Miscellaneous Natural Gas Equipment: Space Heater HV-9, Middle Building	
EU0145	Miscellaneous Natural Gas Equipment: Space Heater HV-10, Grinnell Building	
EU0150	Miscellaneous Natural Gas Equipment: Space Heater HV-11, Grinnell Building	
EU0155	Miscellaneous Natural Gas Equipment: Space Heater HV-12, Grinnell Building	
EU0160	Miscellaneous Natural Gas Equipment: Space Heater HV-13, Grinnell Building	
EU0165	Miscellaneous Natural Gas Equipment: Space Heater HV-14, Grinnell Building	
EU0170	Miscellaneous Natural Gas Equipment: Space Heater HVAC-8, Grinnell Roof	
EU0175	Miscellaneous Natural Gas Equipment: Space Heater HVAC-9, Grinnell Roof	
EU0180	Miscellaneous Natural Gas Equipment: Space Heater HVAC-10, Tech Service Roof	
EU0185	Miscellaneous Natural Gas Equipment: Space Heater HVAC-11, Tech Service Roof	
EU0190	Miscellaneous Natural Gas Equipment: Space Heater HVAC-12, Tech Service Roof	
EU0195	Miscellaneous Natural Gas Equipment: Space Heater HVAC-13, Tech Service Roof	
EU0200	Miscellaneous Natural Gas Equipment: Space Heater HVAC-14, Tech Service Roof	
EU0205	Miscellaneous Natural Gas Equipment: Space Heater HVAC-15, Tech Service Roof	
EU0210	Miscellaneous Natural Gas Equipment: Space Heater HVAC-16, Tech Service Roof	
EU0215	Miscellaneous Natural Gas Equipment: Space Heater HVAC-17, Tech Service Roof	
EU1700	Aggregate Mixing & Material Handling System: Bulk Bag Unloaders (3)	EP55
EU1705	Aggregate Mixing & Material Handling System: Feed Hopper	EP55
EU1710	Aggregate Mixing & Material Handling System: Raw Material Conveyors	EP55
EU1715	Aggregate Mixing & Material Handling System: Batch Mixer	EP55
EU1720	Aggregate Mixing & Material Handling System: Product Conveyor	EP55
EU1725	Aggregate Mixing & Material Handling System: Batch Hopper	EP55
EU6005	Cold Solvent Parts Washer	EP08
EU7100	Accelerated Remediation Technologies Vapor Extraction System	EP-VE

EMISSION UNITS WITHOUT LIMITATIONS

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

Emission Unit #	Description of Emission Unit	Emission Point No.
EU1000	Mixer #1/2/3 (Tk 1)	EP08
EU1005	Mixer #1/2/3 (Tk 2)	EP08
EU1010	Mixer #1/2/3 (Tk 3)	EP08
EU1015	Mixer #4/5 (Tk 4)	EP08
EU1020	Mixer #4/5 (Tk 5)	EP08
EU1025	Mixer #6/7 (Tk 6)	EP08
EU1030	Mixer #6/7 (Tk 7)	EP08
EU1045	Mixer #10/11 (Tk 10)	EP08
EU1050	Mixer #10/11 (Tk 11)	EP08
EU1055	Mixer #TMS25 (High Solids)	EP08
EU1060	Mixer #TMS26 (High Solids)	EP08
EU1065	Mixer #TMH27 (High Solids)	EP08
EU1070	Mixer #TMH28 (High Solids)	EP08
EU1075	Mixer #HS12	EP08
EU1080	Mixer #HS13	EP08
EU1085	Bay Mixer #1	EP08
EU1090	Bay Mixer #2	EP08
EU1095	Bay Mixer #3	EP08
EU1100	Bay Mixer #4	EP08
EU1105	Bay Mixer #5	EP08
EU1110	Bay Mixer #6	EP08
EU1115	Bay Mixer #7	EP08
EU1120	Bay Mixer #8	EP08
EU1125	Bay Mixer #9	EP08
EU1130	Bay Mixer #10	EP08
EU1135	Bay Mixer #11	EP08
EU1140	Bay Mixer #12	EP08
EU1145	Cowles Pigment Dissolver	EP08
EU1150	Reynold Dual Shaft Mixer	EP08
EU1155	Shar High Speed Disperser	EP08
EU1160	Shar High Speed Mixer	EP08
EU1165	Dual Shaft Hockmeyer High Speed Disperser	EP08
EU1170	Hockmeyer Dual Shaft 300 Horse Power Mixer	EP08
EU1400	Mixer #HS20 (Shade)	EP08
EU1405	Mixer #HS21 (Shade)	EP08
EU1410	Mixer #HS22 (Shade)	EP08

Emission Unit #	Description of Emission Unit	Emission Point No.
EU1415	Mixer #HS24 (Shade)	EP08
EU1420	Small Air Mixer #2	EP08
EU1425	Small Air Mixer #3	EP08
EU1430	Small Air Mixer #4	EP08
EU1435	Small Air Mixer #5	EP08
EU1440	Small Air Mixer #1	EP08
EU1445	Small Air Mixer #2	EP08
EU1450	Small Air Mixer #3	EP08
EU1455	Small Air Mixer #4	EP08
EU1460	Small Air Mixer #5	EP08
EU1465	Small Air Mixer #6	EP08
EU1470	Small Air Mixer #7	EP08
EU1475	Small Air Mixer #8	EP08
EU1480	Small Air Mixer #9	EP08
EU1485	Small Air Mixer #10	EP08
EU1490	Small Air Mixer #11	EP08
EU1495	Colorant Dispenser #3	EP08
EU1500	Small Air Mixer #12	EP08
EU1505	Small Air Mixer #13	EP08
EU1510	Small Air Mixer #14	EP08
EU1515	Small Air Mixer #15	EP08
EU1900	Putty Machine #1	EP08
EU1905	Putty Machine #2	EP08
EU1910	Aluminum Blend #1	EP08
EU2000	Solvent Storage Tank #1 (Xylene)	EP08
EU2005	Solvent Storage Tank #2 (Mineral Spirits)	EP08
EU2010	Solvent Storage Tank #3 (n-Butyl Alcohol)	EP08
EU2015	Solvent Storage Tank #4 (Methyl Isobutyl Ketone)	EP08
EU2020	Solvent Storage Tank #5 (Methyl Ethyl Ketone)	EP08
EU2025	Base Holding Tank #1	EP08
EU2030	Base Holding Tank #2	EP08
EU2035	Base Holding Tank #3	EP08
EU2040	Base Holding Tank #4	EP08
EU2045	Base Holding Tank #5	EP08
EU2050	Base Holding Tank #6	EP08
EU2055	Base Holding Tank #7	EP08
EU2060	Base Holding Tank #8	EP08
EU2065	Base Holding Tank #10	EP08
EU2070	Base Holding Tank #11	EP08
EU2075	Portable Base Holding Containers (5-gallon, 10-gallon, 30-gallon, 55-gallon)	EP08

Emission Unit #	Description of Emission Unit	Emission Point No.
EU2080	Base Holding Tank #15A	EP08
EU2085	Base Holding Tank #16A	EP08
EU2500	Resin Storage Tank #1	EP08
EU2505	Resin Storage Tank #2	EP08
EU2510	Resin Storage Tank #3	EP08
EU2515	Resin Storage Tank #4	EP08
EU2520	Resin Storage Tank #5	EP08
EU2525	Resin Storage Tank #6	EP08
EU2530	Resin Storage Tank #7	EP08
EU2535	Resin Storage Tank #8	EP08
EU2540	Resin Storage Tank #9	EP08
EU2545	Resin Storage Tank #10	EP08
EU2550	Resin Storage Tank #11	EP08
EU2555	Resin Storage Tank #12	EP08
EU3000	Hockmeyer Basket Media Mill	EP08
EU3100	Ball Mill #1	EP08
EU3105	Ball Mill #2	EP08
EU3110	Ball Mill #5	EP08
EU4000	Mixer #RW1 (Water Base)	EP08
EU4005	Mixer #RW2 (High Solids, Low VOC)	EP08
EU4010	Mixer #RW3 (Water Base)	EP08
EU4015	Letdown Tank #1	EP08
EU4020	Letdown Tank #2	EP08
EU4025	Letdown Tank #3	EP08
EU4030	Letdown Tank #4	EP08
EU4035	Letdown Tank #5	EP08
EU4040	Letdown Tank #6	EP08
EU4045	Letdown Tank #7	EP08
EU4050	Letdown Tank #8	EP08
EU4055	Letdown Tank #9	EP08
EU4060	Letdown Tank #10	EP08
EU4065	Portable Production Equipment (5-gallon, 10-gallon, 30-gallon, 55-gallon)	EP08
EU5000	Gallon Can Filling Machine	EP08
EU5005	Twin 5-Gallon Pail Weigh Filler	EP08
EU5010	Handfill Thinner Manifold	EP08
EU5015	Neupack 4-head paint filling machine	EP08
EU5100	Putty Filler #1	EP08
EU5105	Putty Filler #2	EP08
EU5110	Filler Pot #1	EP08
EU5115	Filler Pot #2	EP08

Emission Unit #	Description of Emission Unit	Emission Point No.
EU5120	Filler Pot #3	EP08
EU5125	Filler Pot #4	EP08
EU5130	Filler Pot #5	EP08
EU5135	Filler Pot #6	EP08
EU5140	Filler Pot #7	EP08
EU5145	Filler Pot #8	EP08
EU5150	Filler Pot #9	EP08
EU5155	Filler Pot #10	EP08
EU5160	Filler Pot #11	EP08
EU5200	Strainer #1	EP08
EU5205	Strainer #2	EP08
EU5210	Strainer #3	EP08
EU5215	Strainer #4	EP08
EU5220	Strainer #5	EP08
EU5225	Strainer #6	EP08
EU5230	Strainer #7	EP08
EU6000	Portable solvent wash containers (5-gallon, 10-gallon, 30-gallon, 55-gallon)	EP08
EU7000	Still	EP08
EU7005	Still Tank #1	EP08
EU7010	Still Tank #2	EP08
EU7015	Sludge Disposal Drums	EP08
EU8000	R&D Spray Booth, 1st Floor	EP20
EU8005	R&D Spray Booth, 2nd Floor	EP21
EU8010	R&D Large Spray Booth	EP31
EU8015	R&D Grit Blasting Cabinet	EP08
EU8020	R&D Hockmeyer High-Speed Disperser	EP08
EU8025	Technical Service Spray Booths (#1 and #2)	EP45

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

1) Construction Permit #0899-008, Issued May 20, 1999, (Permitting of equipment installed between 1986 and 1997).
2) Construction Permit #0899-008a, Issued March 13, 2001 (Permitting of equipment installed between 1986 and 1997).
3) Construction Permit #012000-003, Issued December 15, 1999 (Installation of a Cowles pigment dissolver).
4) Construction Permit #092001-001, Issued July 27, 2001 (Addition of a Reynold Dual Shaft Mixer).
5) Construction Permit #062002-014, Issued June 11, 2002 (Installation of a solvent recovery process and modification of an existing mixer from water base to low VOC, high solid mixer).
6) Construction Permit #012008-003, Issued January 7, 2008 (Installation of a mixer and an aggregate mixing and material handling system to transport and mix sand and cement).

7) Construction Permit #062009-008, Issued June 18, 2009 (Installation of a Vapor Extraction System).
8) Construction Permit Amendment #062009-008a, Issued October 28, 2009 (Installation of a Vapor Extraction System).

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.

PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) *Voluntary Limitation(s)*
10 CSR 10-6.060 *Construction Permits Required*
Construction Permit *012008-003, Issued January 7, 2008*

Emission / Operational Limitation:

1) The permittee shall emit less than 40 tons of volatile organic compounds (VOC) in any consecutive 12-month period from the entire installation.
2) The permittee shall emit less than 10 tons of any single hazardous air pollutant (HAP) and less than 25 tons of total HAPs in any consecutive 12-month period from the entire installation.

Monitoring / Recordkeeping Requirements:

1) The permittee shall maintain accurate records of the information necessary to calculate monthly VOC and HAP emissions from all sources.
2) The permittee shall calculate monthly VOC emissions associated with all operations at this installation. The permittee shall record all VOC emissions on a monthly basis with a consecutive 12-month total.
3) The permittee shall calculate monthly HAP emissions associated with all operations at this installation. The permittee shall record all HAP emissions on a monthly basis with a consecutive 12-month total.
4) Attachments B and C contain logs satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
5) The permittee shall maintain these records on site for the most recent 60 months.
6) The permittee shall immediately make such records available to any Department of Natural Resources' personnel upon request.

Reporting Requirements:

1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of 100 tons of VOC emissions.
2) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month, if the consecutive 12-month total records show that the source exceeded the limitation 10 tons of any single HAP emissions or 25 tons of total HAP emissions.
3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.060 *Construction Permits Required*
Construction Permit *0899-008, Issued May 20, 1999*
Construction Permit *0899-008A, Issued March 13, 2001*

Emission / Operational Limitation:

The permittee shall emit less than 40 tons of volatile organic compounds (VOC) from the paint production equipment installed per Construction Permit No. 0899-008 and like-kind replacements in any consecutive 12-month period.

Monitoring / Recordkeeping / Reporting Requirements:

Compliance with permit condition PW001 ensures compliance with the special conditions of Construction Permit 0899-008A therefore no additional monitoring, recordkeeping and reporting requirements are necessary for this permit condition.

PERMIT CONDITION PW003

10 CSR 10-6.060 *Construction Permits Required*
Construction Permit *062002-014, Issued June 11, 2002*

Emission / Operational Limitation:

1) All tanks at the installation which store VOC with a vapor pressure greater than or equal to 10 kilopascals (kPa) or 1.5 pounds per square inch (psi) at 20 °C shall be equipped with pressure / vacuum conservation vents set at 0.2 kPa (0.029 psi) except where more effective air pollution control is used and has been approved by the Director.
2) All stationary VOC containers at the installation with a capacity greater than 250 gallons shall be equipped with a submerged fill pipe or bottom fill, except where more effective air pollution control is used and has been approved by the Director.
3) Covers shall be installed on all open-top tanks at the installation used for the production of non-water based coating products. These covers shall remain closed except when production, sampling, maintenance or inspection procedures require operator access.
4) Covers shall be installed on all tanks containing VOC used for cleaning equipment. These covers shall remain closed except when operator access is required.

Monitoring / Recordkeeping Requirements:

1) The permittee shall maintain monthly records that include the composition and vapor pressure of the materials stored in the tanks at the installation and the vacuum conservation vent settings for each tank.
2) At least once each calendar month, the permittee shall monitor and record the setting of pressure/vacuum vent settings on each of the tanks that have been used to store VOC with a vapor pressure greater than or equal to 10 kPa or 1.5 psi within the most recent consecutive 30 day period.
3) The permittee shall maintain records that indicate that each open top tank used for the production of non-water base coating products and each tank containing VOC used for cleaning equipment is equipped with a cover. These records shall be maintained for the life of the equipment or a minimum of 5-years after the equipment is removed from service, whichever is longer.
4) The permittee shall maintain these records on site for the most recent 60 months unless a longer period is specified with the requirement.
5) The permittee shall immediately make such records available to any Department of Natural Resources' personnel upon request.

Reporting Requirements:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and Section V of this permit.

PERMIT CONDITION PW004

10 CSR 10-6.075 *Maximum Achievable Control Technology Regulations*
40 CFR Part 63, Subpart A *General Provisions* and Subpart CCCCCCC *National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing*

Note: The requirements of this permit condition will be applicable to any units that handle pigments and solids regulated by this rule.

Emission / Operational Limitations:

1) The permittee shall add dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process.
   a) *Process Vessels*: The permittee shall control particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel using one of the following methods:
      1. Capture particulate emissions and route them to a particulate control device meeting the visible emissions requirements of ***paragraph 2)***, below.
      2. Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel only in paste, slurry, or liquid form.
   b) *Grinding and Milling Process*: The permittee shall control particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process using one of the following methods:
      1. Capture particulate emissions and route them to a particulate control device meeting the visible emissions requirements of ***paragraph 2)***, below.
      2. Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form.
   c) *Grinding and Milling of Materials*: The permittee shall control particulate emissions during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel using one of the following methods:
      1. Capture particulate emissions and route them to a particulate control device meeting the visible emissions requirements of ***paragraph 2)***, below.
      2. Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel.
      3. Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel.
2) The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere.
3) The permittee shall ensure that all affected emission units meet the following compliance dates:
   a) *Existing Units*: Any unit that began construction or reconstruction on or before June 1, 2009 shall be in compliance with the applicable provisions by December 3, 2012.

b) *New Units*: Any unit that began construction or reconstruction after June 1, 2009 shall be in compliance by December 3, 2009 or the start-up of the unit, whichever is later.

Monitoring / Recordkeeping Requirements:

Initial Compliance Requirements, §63.11602(a)(1):

1) The permittee shall conduct an initial inspection of each particulate control device according to the following requirements:
   a) For each wet particulate control system, the permittee shall verify the presence of water flow to the control equipment. The permittee shall also visually inspect the system ductwork and control equipment for leaks and inspect the interior of the control equipment (if applicable) for structural integrity and the condition of the control system.
   b) For each dry particulate control system, the permittee shall visually inspect the system ductwork and dry particulate control unit for leaks. The permittee shall also inspect the inside of each dry particulate control unit for structural integrity and condition.
   c) An initial inspection of the internal components of a wet or dry particulate control system is not required if there is a record that an inspection meeting the requirements permit condition has been performed within the past 12 months and any maintenance actions have been resolved.
2) The permittee shall perform a visible emissions test consisting of three 1-minute test runs using Method 203C (40 CFR Part 51, appendix M). The visible emission test runs must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If the average test results of the visible emissions test runs indicate an opacity greater than the limitation listed in ***Emission / Operational Limitations, paragraph [2)]***, above, the permittee must take corrective action and retest within 15 days.
3) The permittee shall record the results of each inspection and test and perform corrective action as necessary. The permittee shall record the following information for each activity:
   a) The date, place, and time;
   b) Person conducting the activity;
   c) Technique or method used;
   d) Operating conditions during the activity;
   e) Results; and
   f) Description of correction actions taken.
4) The permittee shall conduct an inspection for each affected emission unit no later than 180 days after the applicable compliance date for each control device which has been operated within 60 days following the compliance date. For a control device which has not been installed or operated within 60 days following the compliance date, the permittee shall conduct an initial inspection prior to startup of the control device.

Ongoing Compliance Requirements, §63.11602(a)(2):

5) The permittee shall perform periodic inspections of each particulate control device as follows:
   a) The permittee shall inspect and maintain each wet particulate control system according to the following requirements:
      1. Conduct a daily inspection to verify the presence of water flow to the wet particulate control system.
      2. Conduct weekly visual inspections of any flexible ductwork for leaks.
      3. Conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the wet control system (if applicable) to determine the structural integrity and condition of the control equipment every 12 months.

b) The permittee shall inspect and maintain each dry particulate control unit according to the following requirements:
   1. Conduct weekly visual inspections of any flexible ductwork for leaks.
   2. Conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.

6) The permittee shall perform the following visible emissions observations:
   a) Conduct a 5-minute visual determination of emissions from the particulate control device every 3 months (or upon first use of the equipment following three months of non-use) using Method 22 (40 CFR Part 60, appendix A-7). The visible emission test must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment.
   b) If visible emissions are observed for two minutes of the required 5-minute observation period, the permittee shall conduct a Method 203C (40 CFR Part 51, appendix M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment.
   c) If the Method 203C test runs indicates an opacity greater than the limitation in ***Emission / Operational Limitations, paragraph [2)]***, above, the permittee shall comply with the following requirements:
      1. The permittee shall take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. The permittee must continue to take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in ***Emission / Operational Limitations, paragraph [2)]***, above.
      2. The permittee shall prepare a deviation report in accordance with ***Reporting Requirements, paragraph [2)c)]***, below, for each instance in which the Method 203C opacity results were greater than the limitation in ***Emission / Operational Limitations, paragraph [2)]***, above.
      3. The permittee shall resume the visible determinations of emissions from the particulate control device in accordance with the requirements of this section 3 months after the previous visible determination.

7) The permittee shall record the results of each inspection and test and perform corrective action as necessary. The permittee shall record the following information for each activity:
   a) The date, place, and time;
   b) Person conducting the activity;
   c) Technique or method used;
   d) Operating conditions during the activity;
   e) Results; and
   f) Description of correction actions taken.

General, §63.11603(c) and §63.10(b)(1):

8) The permittee shall keep copies of all reports, notifications, inspections, and tests performed and all documentation supporting any Notification of Applicability and Notification of Compliance Status submitted. The records must be in a form suitable and readily available for expeditious review.

9) The permittee shall keep copies of any determination showing that the provisions of this rule are not applicable to the emission units at the installation.
10) The permittee shall maintain all records for a minimum of 5 years after the date of each recorded action or submittal.
    a) The permittee shall keep each record onsite for at least 2 years after the date of each recorded action.
    b) The permittee may keep the records offsite for the remaining 3 years.
11) The permittee shall immediately make such records available to any Department of Natural Resources' personnel upon request.

Reporting Requirements:

Notifications required by §63.11603(a) and §63.9:

1) The permittee shall submit the following notifications to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as applicable for the emission unit(s) subject to the rule:
    a) The permittee shall submit an initial notification of applicability as specified in §63.9(b) to the Air Pollution Control Program which indicates that the installation is subject to 40 CFR Part 63 Subpart CCCCCCC. For existing equipment, the initial notification must be submitted no later than June 1, 2010. For new equipment, the initial notification must be submitted no later than 180 days after initial start-up of the operations or June 1, 2010, whichever is later. Notification of applicability must contain the following information:
        1. The name and address of the owner or operator;
        2. The address (i.e., physical location) of the affected source; and
        3. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date.
    b) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). For existing equipment, the Notification of Compliance Status must be submitted by June 3, 2013. For new equipment, the Notification of Compliance Status must be submitted within 180 days after initial start-up, or by June 1, 2010, whichever is later. For existing equipment which commences using, processing, or generating HAP regulated by this rule [see §63.11599(b)(3)], the Notification of Compliance Status must be submitted within 180 days of the date that the permittee commences processing, using, or generating materials containing HAP, as defined in §63.11607. The Notification of Compliance Status must contain the following information:
        1. The permittee's name and address;
        2. A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification, a description of the method of compliance (i.e., compliance with management practices, installation of a wet or dry scrubber) and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.
    c) The permittee shall submit additional notifications specified in §63.9, as applicable.

Annual Compliance Certification and Deviation Reports required by §63.11603(b):

2) The permittee shall prepare an Annual Compliance Certification report as applicable for the emission units subject to this rule according to the following requirements:
    a) The reporting period shall be:
        1. The first Annual Compliance Certification report must cover the first annual reporting period which begins the day of the compliance date and ends on December 31.

2. Each subsequent Annual Compliance Certification report must cover the annual reporting period from January 1 through December 31.

b) Each Annual Compliance Certification report shall contain the following information:
   1. The permittee's name and address;
   2. A statement in accordance with §63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and
   3. Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31.

c) Deviation Report. If a deviation has occurred during the reporting period, the permittee shall include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken.

3) The Annual Compliance Certification report shall be prepared no later than April 1st. The permittee shall keep the completed report in a readily-accessible location for inspector review. The permittee is not required to submit the Annual Compliance Certification unless a deviation from the requirements of this rule has occurred during the reporting year.

4) If a deviation has occurred during the reporting year, the permittee shall submit the Annual Compliance Certification along with the Deviation Report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. Both reports shall be postmarked no later than February 15 following the end of the reporting year.

Additional Notifications required by §63.11603(e):

5) If the permittee no longer processes, uses, or generates materials containing HAP after December 3, 2009, the permittee shall submit a Notification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, in accordance with §63.11599(d), which must include the following information:
   a) The permittee's name and address;
   b) A statement by a responsible official indicating that the facility no longer processes, uses, or generates materials containing HAP, as defined in §63.11607, and that there are no plans to process, use or generate such materials in the future. This statement should also include the date by which the company ceased using materials containing HAP, as defined in 63.11607, and the responsible official's name, title, phone number, e-mail address and signature.

General, All:

6) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and 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.

EU0010 through EU0215 – Natural Gas Fired Equipment Used for Indirect Heating			
Emission Unit	Description	Manufacturer/Model #	2007 EIQ Reference #
EU0010	Boiler #1 (2.049 MM Btu/hr)	Weil McLain 788 (1995)	N/A
EU0020	Boiler #2 (0.104 MM Btu/hr)	Smith; Model GB100W (2001)	N/A
EU0030	Boiler #3 (0.104 MM Btu/hr)	Smith; Model GB100W (2001)	N/A
EU0050	Air Make Up Heating Unit #1 (1.9 MM Btu/hr)	King National, 88DF4851 (1988)	N/A
EU0055	Air Make Up Heating Unit #2 (1.9 MM Btu/hr)	King National, 88DF4852 (1988)	N/A
EU0060	Space Heater HV-1, New Warehouse (1.5 MM Btu/hr)	Rapid Engineering, 160096 (1986)	N/A
EU0065	Space Heater HV-2, New Warehouse (1.5 MM Btu/hr)	Rapid Engineering, 160096 (1986)	N/A
EU0070	Space Heater HVAC-1, New Warehouse (0.0924 MM Btu/hr)	Carrier, 3885G66195 (1986)	N/A
EU0075	Space Heater HVAC-2, New Warehouse (0.0410 MM Btu/hr)	York, NAXM033528 (1990)	N/A
EU0080	Space Heater HVAC-3, New Warehouse (0.103 MM Btu/hr)	York, NKWM460064 (1990)	N/A
EU0085	Space Heater HVAC-4, New Warehouse (0.103 MM Btu/hr)	York, NKWM460093 (1990)	N/A
EU0090	Space Heater HVAC-5, New Warehouse (0.103 MM Btu/hr)	York, NAXM026688 (1990)	N/A
EU0095	Space Heater HVAC-6, New Warehouse (0.103 MM Btu/hr)	York, NGWM368140 (1990)	N/A
EU0100	Space Heater HVAC-7, New Warehouse (0.162 MM Btu/hr)	York, NBXM101878 (1990)	N/A
EU0105	Space Heater HVAC-7A, New Warehouse (0.080 MM Btu/hr)	Trane, K12167088 (1995)	N/A
EU0110	Space Heater HV-3, West Dock Area (1.5 MM Btu/hr)	ca 1986	N/A
EU0115	Space Heater HV-4, West Dock Area (1.5 MM Btu/hr)	ca 1986	N/A
EU0120	Space Heater HV-5, West Dock Area (1.5 MM Btu/hr)	ca 1986	N/A
EU0125	Space Heater HV-6, Middle Building (1.5 MM Btu/hr)	ca 1986	N/A
EU0130	Space Heater HV-7, Middle Building (1.5 MM Btu/hr)	ca 1986	N/A

EU0010 through EU0215 – Natural Gas Fired Equipment Used for Indirect Heating			
Emission Unit	Description	Manufacturer/Model #	2007 EIQ Reference #
EU0135	Space Heater HV-8, Middle Building (1.5 MM Btu/hr)	ca 1986	N/A
EU0140	Space Heater HV-9, Middle Building (1.5 MM Btu/hr)	ca 1986	N/A
EU0145	Space Heater HV-10, Grinnell Building (1.5 MM Btu/hr)	ca 1986	N/A
EU0150	Space Heater HV-11, Grinnell Building (1.5 MM Btu/hr)	ca 1986	N/A
EU0155	Space Heater HV-12, Grinnell Building (1.5 MM Btu/hr)	ca 1986	N/A
EU0160	Space Heater HV-13, Grinnell Building (1.5 MM Btu/hr)	ca 1986	N/A
EU0165	Space Heater HV-14, Grinnell Building (1.5 MM Btu/hr)	ca 1986	N/A
EU0170	Space Heater HVAC-8, Grinnell Roof (0.103 MM Btu/hr)	ca 1990	N/A
EU0175	Space Heater HVAC-9, Grinnell Roof (0.103 MM Btu/hr)	ca 1990	N/A
EU0180	Space Heater HVAC-10, Tech Service Roof (0.103 MM Btu/hr)	ca 1990	N/A
EU0185	Space Heater HVAC-11, Tech Service Roof (0.103 MM Btu/hr)	ca 1990	N/A
EU0190	Space Heater HVAC-12, Tech Service Roof (0.103 MM Btu/hr)	ca 1990	N/A
EU0195	Space Heater HVAC-13, Tech Service Roof (0.103 MM Btu/hr)	ca 1990	N/A
EU0200	Space Heater HVAC-14, Tech Service Roof (0.103 MM Btu/hr)	ca 1990	N/A
EU0205	Space Heater HVAC-15, Tech Service Roof (0.103 MM Btu/hr)	ca 1990	N/A
EU0210	Space Heater HVAC-16, Tech Service Roof (0.103 MM Btu/hr)	ca 1990	N/A
EU0215	Space Heater HVAC-17, Tech Service Roof (0.103 MM Btu/hr)	ca 1990	N/A

PERMIT CONDITION EU0010-001 through EU0215-001

10 CSR 10-2.040 *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

Emission Limitation:

Particulate matter shall not be emitted from the new indirect heating sources at the installation, EU0010 through EU0215, in excess of 0.29 pounds per million BTU of heat input.

Monitoring / Recordkeeping Requirements:

1) Attachment E contains a worksheet calculation demonstrating compliance with this rule. The permittee shall keep Attachment H with this permit.
2) The permittee shall maintain all records onsite for a minimum of five years.

3) The permittee shall immediately make any record available for inspection to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and Section V of this permit.

EU1700 through EU1730 – Aggregate Mixing and Handling System			
Emission Unit	Description	Manufacturer/Model #	2007 EIQ Reference #
EU1700	Bulk Bag Unloaders (3)		EP55
EU1705	Feed Hopper		EP55
EU1710	Raw Material Conveyors		EP55
EU1715	Batch Mixer		EP55
EU1720	Product Conveyor		EP55
EU1725	Batch Hopper		EP55
	All transfer points are enclosed by ductwork and vented to a cartridge filter		

PERMIT CONDITION EU1700-001 through EU1730-001

10 CSR 10-6.060 *Construction Permits Required*
Construction Permit *012008-003, Issued January 7, 2008*

Emission / Operational Limitation:

1) The permittee shall control emissions from the aggregate mixing and materials handling system by enclosing all transfer points with ductwork and venting emission from these transfer points to the cartridge filter.
2) The cartridge filter shall be operated and maintained in accordance with the manufacturer's specifications.

Monitoring / Recordkeeping Requirements:

1) The permittee shall equip the cartridge filter with a gauge or meter which indicates the pressure drop across the control device. The gauge or meter shall be located such that it may be easily observed by Missouri Department of Natural Resources' personnel.
2) The permittee shall maintain the operating pressure drop within the design conditions specified by the manufacturer's performance warranty.
3) The permittee shall monitor and record the operating pressure drop across the cartridge filters at least once every 24 hours.
4) Replacement filters shall be kept on hand at all times. The filters shall be suitable to the operating conditions that are expected to occur during use.
5) The permittee shall maintain an operating and maintenance log for the cartridge filters which includes the following:
   a) Incidence of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   b) Maintenance activities, with inspection schedule, repair actions, replacements, etc.

Attachment A contains a log satisfying these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

6) The permittee shall maintain these records on site for a minimum of five years.
7) The permittee shall immediately make such records available to any Department of Natural Resources' personnel upon request.

Reporting Requirements:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B and Section V of this permit.

EU6006 – Cold Solvent Parts Washer			
Emission Unit	Description	Manufacturer/Model #	2007 EIQ Reference #
EU6005	Cold Solvent Parts Washer	Crystal Clean	N/A

PERMIT CONDITION EU6005-001

10 CSR 10-2.210 *Control of Emissions from Solvent Metal Cleaners*

Emission / Operational Limitation:

1) The permittee shall not use cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at twenty degrees Celsius (20°C) in the EU6005 Cold Solvent Parts Washer.
2) The EU6005 cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir which will limit the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
3) The cover on the EU6005 Cold Solvent Parts Washer shall be closed whenever parts are not being handled in the cleaner or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
   a) The EU6005 cold cleaner shall have a drainage facility which will be internal so that parts are enclosed under the cover while draining.
   b) If an internal drainage facility cannot fit into the cleaning system and the solvent volatility is less than six-tenth pounds per square inch (psi) measured at 100 degrees F, then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
   c) Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until the dripping ceases, whichever is longer.

Monitoring / Recordkeeping Requirements:

1) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment.
2) Only persons trained in at least the operational and equipment requirements specified in this rule for their particular solvent metal cleaning process shall be permitted to operate the equipment. The supervisor of any person who operates a solvent metal cleaning process shall receive equal or greater operational training than the operator. Refresher training shall be given to all solvent metal cleaning equipment operators at least once each twelve (12) months.
3) If the EU6005 cold cleaner fails to perform within the operating parameters established, the unit shall be shut down immediately and shall remain shut down until trained service personnel are able to restore operation of the unit within established parameters.

4) Solvent leaks shall be repaired immediately or the solvent parts cleaner shall be shutdown until the leaks are repaired.
5) Any waste material removed from a cold cleaner shall be disposed of by one (1) of the following methods or an equivalent method approved by the Director and EPA:
   a) Reduction of the waste material to less than twenty percent (20%) VOC solvent by distillation and proper disposal of the still bottom waste; or
   b) Stored in closed containers for transfer to a contract reclamation service; or a disposal facility approved by the Director and EPA.

   Waste solvent shall be stored in closed containers only.
6) The permittee shall maintain records which include for each purchase of cold cleaning solvent:
   a) The name and address of the solvent supplier;
   b) The date of purchase;
   c) The type of solvent; and
   d) The vapor pressure of the solvent in mmHg at twenty degrees Celsius (20°C).
7) The permittee shall keep records of all types and amounts of solvent containing waste material from EU6005 operations which are transferred to either a contract reclamation service or to a disposal facility and all amounts distilled on the premises. The records also shall include maintenance and repair logs for both the degreaser and any associated control equipment. These records shall be kept current and made available for review on a monthly basis. The Director may require additional record keeping if necessary to adequately demonstrate compliance with this rule.
8) A record shall be kept of solvent metal cleaning training for each employee.
9) The permittee shall maintain these records on site for a minimum of 5 years.
10) The permittee shall immediately make such records available to any Department of Natural Resources' personnel upon request.

Reporting Requirements:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B and Section V of this permit.

EU7100 – Vapor Extraction System			
Emission Unit	Description	Manufacturer/Model #	2007 EIQ Reference #
EU7100	Dynamic Subsurface Circulation System	Accelerated Remediation Technologies	EP-VE

PERMIT CONDITION EU7100-001

10 CSR 10-6.060 *Construction Permits Required*
Construction Permit *062009-008, Issued June 18, 2009*
Construction Permit *062009-008A, Issued October 29, 2009*

Emission / Operational Limitation:

1) The permittee shall emit less than 40 tons of volatile organic compounds (VOC) from the Accelerated Remediation Technologies' Dynamic Subsurface Circulation System in any consecutive 12-month period.

2) The permittee shall emit less than 10 tons of any single hazardous air pollutant (HAP) and less than 25 tons of total HAPs from the Accelerated Remediation Technologies' Dynamic Subsurface Circulation System in any consecutive 12-month period

Monitoring / Recordkeeping Requirements:

1) The permittee shall conduct performance tests in order to develop emission factors for VOC and HAP emissions from EU7100. The following schedule shall be used for performance testing:
   a) The first test shall be performed within fifteen (15) days after achieving the maximum production rate of the equipment, but not later than 30 days after initial start-up of operation and shall be conducted in accordance with the Stack Test Procedures outlined in Special Condition Number 4.
   b) Stack testing shall be performed on the Accelerated Remediation Technologies' Dynamic Subsurface Circulation systems' stack (EP-VE) once per month for the first three months, quarterly for the remainder of the first two years, and semi-annually for any years of operation after the first two years.
   c) Performance test results shall be recorded as indicated on Attachments F-1 and F-2, or equivalent forms created by the permittee.
   d) The permittee shall maintain copies of each test summary report as described in ***Reporting Requirements, [3)]*** below, on-site for a minimum of (5) five years after completion of the test.
2) Each time a performance test is conducted, the permittee shall calculate the flow rate from EU7100 in cubic feet per hour (CFH) using the following method:
   a) Record the vacuum reading (IWC; inches of water column) on the vacuum gauge on the Soil Vapor Extraction (SVE) blower.
   b) Measure the flow differential (Delta P) in the 4-inch influent line to the blower using the Dwyer Digital Manometer and installed Pilot tube assembly on the 4-inch line.
   c) Refer to the collection of graphs of Delta P v Flow Rate found in Attachment D to Construction Permit 062009-008A. Using the graph for the vacuum reading recorded in ***[2)a)]*** above, record the vapor flow from the X-axis that corresponds to the Delta P point on the Y-axis that was measured in 1)b) above. The vapor flow shall be recorded as indicated on Attachments F-1 and F-2, or equivalent forms created by the permittee.
   d) Graphs are currently included for vacuum readings between 30" to 70" inches of water column. If the vacuum reading is outside of this range, the permittee shall apply to the Department within 45 days for an amendment to receive approval to obtain additional graphs.
3) The permittee shall calculate VOC and individual HAP emission factors following each performance test. Emission factors shall be recorded as indicated on Attachments F-1 and F-2, or equivalent forms created by the permittee.
4) The permittee shall calculate an average VOC and individual HAP emission factors following each performance test. The average VOC emission factor shall be calculated by adding each VOC emission factor calculated for each performance test and dividing the total by the total number of performance tests conducted. The average emission factor for each HAP which is monitored shall be calculated in a similar manner. Average emission factors shall be recorded as indicated on Attachment F-3. Attachment f-3 shall be maintained for a minimum of 5 years after the Vapor Extraction System has ceased operation.
5) The permittee shall calculate monthly VOC and HAP emissions associated with EU7100. The permittee shall record all VOC and HAP emissions on a monthly basis with a consecutive 12-month total. Attachments F-1 and F-2 contain logs satisfying these recordkeeping requirements. These logs, or equivalent logs created by the permittee, must be used to certify compliance with this requirement.

6) The permittee shall maintain these records on site for the most recent 60 months unless a longer period is specified with the requirement.
7) The permittee shall immediately make such records available to any Department of Natural Resources' personnel upon request.

Reporting Requirements:

1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen days after the end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of 40 tons of VOC emissions, and/or 10 tons of any individual HAP or 25 tons of total HAP.
2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B and 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) 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 following is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
   a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
      1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
      2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
      3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
      4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
   b) Land clearing of vegetative debris, provided all burning occurs -
      1. Outside of any incorporated area or municipality and outside of the Kansas City metropolitan area, Springfield-Greene County area, and the St. Louis metropolitan area;
      2. At least two hundred (200) yards from the nearest occupied structure; and
      3. Land clearing of vegetative debris that does not meet the conditions of subparagraphs d)(1) and d)(2) of this rule may be open burned provided an open burning permit is obtained as found in paragraph 3) below;
   c) Yard waste, with the following exceptions:
      1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
      2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
      3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
         i. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;

ii. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
iii. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
iv. In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and

4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities.

d) Fire training exercises. Fires set for the purposes of training fire fighters and industrial employees in fire fighting methods provided that -
1. The training is conducted in accordance with National Fire Protection Association standards, NFPA 1403, Standard on Live Fire Training Evolutions (2002 Edition), for fire fighters and NFPA 600, Standard on Industrial Fire Brigades (2005 Edition), for industrial employees. The provisions of NFPA 1403 and 600 shall apply and are hereby incorporated by reference in this rule, as published by the National Fire Protection Association, 11 Tracy Drive, Avon, MA 02322. This rule does not incorporate any subsequent amendments or additions. These exercises include, but are not limited to, liquefied gas propane fueled simulators, flashover simulators and stationary live burn towers; and
2. Acquired structures to be used for training exercises are subject to the requirements of 10 CSR 10-6.080, subsection (3)(M), National Emission Standard for Asbestos. These requirements include, but are not limited to, inspection of and notification to the Director. All petroleum-based products are to be removed from any acquired structure that is to be burned as part of a training exercise;

3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if Tnemec Company, Inc. fails to comply with the conditions or any provisions of the permit.
4) Tnemec Company, Inc. may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Tnemec Company, Inc. fails to comply with the provisions or any condition of the open burning permit.
5) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
6) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby

incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.

7) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2) The permittee shall submit the paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

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

1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
2) 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.
3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.

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

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

10 CSR 10-6.150 Circumvention

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

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

Emission Limitation:

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

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 10-2.070 Restriction of Emission of Odors
This requirement is not federally enforceable.

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

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
   b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
   f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as

used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*.

10 CSR 10-6.280 Compliance Monitoring Usage

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

V. General Permit Requirements

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

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

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

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

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

ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than fifteen days after any exceedance of any applicable rule, regulation, or other restriction.

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

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

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

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

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

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

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

None

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

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

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

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

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

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

The application utilized in the preparation of this permit was signed by Kyle Frakes, Manager of Environmental Health and Safety. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants

made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment A

Inspection/Maintenance/Repair/Malfunction Log

Date / Time	Emission Unit # / Equipment Name	Description of Activity / (Type: *Scheduled Inspection / Preventive Maintenance / Emergency Repair*)	Malfunction					
			Malfunction	Impact	Duration	Cause	Description of Repair / Corrective Action	Initials

DUPLICATE THIS FORM AS NEEDED

Attachment B

Plantwide Volatile Organic Compound (VOC) Emissions Log

This record keeping sheet or something similar may be used to demonstrate compliance with PW001.

Month / Year	Equipment Name / (EP/EU ID)	Material Handled	Amount (units)	Emission Factor	VOC Emissions [1] (tons)	12-month Rolling Total VOC [2] (tons)
	Total All:					
	Total All:					
	Total All:					

Note 1: All facility VOC emissions, including working and breathing losses from tank storage, emissions from natural gas combustion, and emissions from the operation of the Vapor Extraction System, must be counted towards the plantwide emission limit.

Note 2: The 12-month rolling total is calculated by adding the Total VOC Emissions for the current month to the monthly totals for the previous eleven (11) months. A 12-month rolling total of less than 100 tons VOC indicates compliance.

DUPLICATE THIS FORM AS NEEDED

Attachment C

Plantwide Hazardous Air Pollutant (HAP) Emissions Log

This record keeping sheet or something similar may be used to show compliance with Permit Condition PW002.

Month / Year	Equipment Name / (EP/EU ID)	Material Handled	Amount (gallons)	HAP1 [Name] Emissions	HAP2 [Name] Emissions	HAP2 [Name] Emissions	HAP2 [Name] Emissions	HAP2 [Name] Emissions	Total HAP Emissions
				(tons)					
	Monthly Total HAP (tons):								
	12-Month Rolling Total HAP (tons):								
	Monthly Total HAP (tons):								
	12-Month Rolling Total HAP (tons):								

Note 1: All facility HAP emissions, including working and breathing losses from tank storage and emissions from the operation of the Vapor Extraction System, must be counted in the totals.

Note 2: The 12-month rolling total is calculated by adding the Total HAP Emissions for the current month to the monthly totals for the previous eleven (11) months. A 12-month rolling total of less than 10 tons of any individual HAP and less than 25 tons of total HAP indicates compliance.

DUPLICATE THIS FORM AS NEEDED

Attachment E

Compliance Documentation: Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Tnemec Company, Inc. has the potential to emit particulate matter less than ten microns (PM_{10}) from fourteen (14) indirect heating sources subject to 10 CSR 10-2.040. These sources burn pipeline grade natural gas exclusively. This attachment documents that these sources will always be in compliance with the rule since the potential to emit will remain below the regulatory allowable emission rate.

A. Emission Limitations

Table H-1 lists the indirect heating sources located at the facility. Indirect heating sources which were installed after February 15, 1979 are considered to be a new source; otherwise they are considered to be an existing source. Each source was classified as follows:

Table H-1: Total Heat Input for All Indirect Heating Sources

Emission Source	Date Installed	Regulatory Applicability	Maximum Capacity (MMBtu/hr)
Boiler #1	Nov 1995	10 CSR 10-2.040 [New Source]	2.0490
Boiler #2	2001	10 CSR 10-2.040 [New Source]	0.1040
Boiler #3	2001	10 CSR 10-2.040 [New Source]	0.1040
Air Make-Up Heating #1	Nov 1988	10 CSR 10-2.040 [New Source]	1.9000
Air Make-Up Heating #2	Nov 1988	10 CSR 10-2.040 [New Source]	1.9000
Space Heater HV-1	Aug 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-2	Aug 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HVAC-1	Aug 1986	10 CSR 10-2.040 [New Source]	0.0924
Space Heater HVAC-2	May 1990	10 CSR 10-2.040 [New Source]	0.0410
Space Heater HVAC-3	May 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-4	May 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-5	May 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-6	May 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-7	May 1990	10 CSR 10-2.040 [New Source]	0.1620
Space Heater HVAC-7A	Oct 1995	10 CSR 10-2.040 [New Source]	0.0800
Space Heater HV-3, West Dock Area	ca 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-4, West Dock Area	ca 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-5, West Dock Area	ca 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-6, Middle Building	ca 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-7, Middle Building	ca 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-8, Middle Building	ca 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-9, Middle Building	ca 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-10, Grinnell Building	ca 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-11, Grinnell Building	ca 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-12, Grinnell Building	ca 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-13, Grinnell Building	ca 1986	10 CSR 10-2.040 [New Source]	1.5000
Space Heater HV-14, Grinnell Building	ca 1986	10 CSR 10-2.040 [New Source]	1.5000

Table H-1: Total Heat Input for All Indirect Heating Sources			
Emission Source	Date Installed	Regulatory Applicability	Maximum Capacity (MMBtu/hr)
Space Heater HVAC-8, Grinnell Roof	ca 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-9, Grinnell Roof	ca 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-10, Tech Service Roof	ca 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-11, Tech Service Roof	ca 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-12, Tech Service Roof	ca 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-13, Tech Service Roof	ca 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-14, Tech Service Roof	ca 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-15, Tech Service Roof	ca 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-16, Tech Service Roof	ca 1990	10 CSR 10-2.040 [New Source]	0.1030
Space Heater HVAC-17, Tech Service Roof	ca 1990	10 CSR 10-2.040 [New Source]	0.1030
Total Installation Heat Input – Existing + New Sources (Q):			**29.7704**

Per 10 CSR 10-2.040, the maximum allowable particulate emission rate, in pounds per million Btu of heat input, was determined as follows:

- Existing Sources, $\leq$ 10 MMBtu/hr maximum rated heat capacity: 0.60 lbs/MMBtu
- New Sources, $\leq$ 10 MMBtu/hr maximum rated heat capacity: 0.40 lbs/MMBtu
- Existing Sources, maximum rated heat capacity between 10 and 5,000 MMBtu/hr: $E = 1.09(Q_E)^{-0.259}$
- New Sources, maximum rated heat capacity between 10 and 1,000 MMBtu/hr: $E = 0.80(Q_N)^{-0.301}$

Where Q_E = the total installation heat input for all existing sources and Q_N = the total installation heat input for all new and existing sources.

The aggregated rated capacity for the indirect heating sources at the facility is 29.7704 MMBtu/hr. Therefore, as new indirect heating sources with a heating capacity greater than 10 MM Btu per hour and less than or equal to 1,000 MM Btu per hour, the emission limit for all sources is was calculated to be 0.29 lbs / MMBtu heat input.

B. Compliance with Emission Limitations

1) Assumptions:

a) The average heating value of natural gas is 1,020 BTU/scf. [AP42, Chapter 1.4]
b) The emission factor for sources burning natural gas is 7.6 lbs/MMscf. [AP42, Table 1.4-1]

2) Potential PM_{10} Emission Factors:

The potential PM_{10} emissions factor for natural gas combustion was calculated using the following formula:

$$\text{Natural Gas, Potential } PM_{10} \text{ EF (lbs/MMBtu)} = \left[\frac{\text{Max Capacity MMBtu}}{\text{Hr}}\right] \times \left[\frac{\text{MMcf}}{1020\ \text{MMBtu}}\right] \times \left[\frac{\text{Emission Factor , lbs}}{\text{MMcf}}\right] = 0.007$$

3) Summary and Conclusions:

Tnemec Company, Inc. will always be in compliance with the applicable emission limit of 0.29 lbs/MMBtu since the calculated emission factor, based on the potential fuel used, is 0.007 lbs/MMBtu which is less than the regulatory limit.

Attachment F-1

Volatile Organic Compound (VOC) Compliance Worksheet for Vapor Extraction System Operations

This record keeping sheet or something similar may be used to demonstrate compliance with permit condition EU7100-001 and Construction Permit 062009-008A.

Month / Year	Results of the most recent Performance Test			Total Monthly Hours of Operation	Average VOC Emission Factor [4] (lbs/hr)	Monthly VOC Emissions [5] (tons)	12-Month Rolling Total VOC Emissions [6] (tons)
	Flow Rate [1] (CF/hr)	VOC Concentration [2] (lbs/CF)	Current VOC Emission Factor [3] (lb/hr)				

Note 1: Each time a performance test is run, record the flow rate calculated during the performance test according to the requirements of permit condition ***EU7100-001, Monitoring/Recordkeeping Conditions 1)***. Otherwise leave this cell blank.

Note 2: Each time a performance test is run, record the VOC concentration measured during the performance test according to the requirements of permit condition ***EU7100-001, Monitoring/Recordkeeping Conditions 2).*** Otherwise leave this cell blank.

Note 3: Each time a performance test is run, calculate a current emission factor by multiplying the Flow Rate by the VOC Concentration. Otherwise leave this cell blank.

Note 4: If a performance test was run during the current month, enter the current emission factor calculated. Otherwise, enter the current average VOC emission factor calculated on Attachment I-3.

Note 5: Calculate monthly emissions by multiplying the Total Monthly Hours of Operation by the Average Emission Factor, divided by 2000.

Note 6: The 12-month rolling total is calculated by adding the Monthly Total VOC Emissions for the current month to the monthly totals for the previous eleven (11) months. A 12-month rolling total of less than 40 tons VOC indicates compliance.

DUPLICATE THIS FORM AS NEEDED

Attachment F-2

Hazardous Air Pollutant (HAP) Compliance Worksheet for Vapor Extraction System Operations

This record keeping sheet or something similar may be used to demonstrate compliance with permit condition EU7100-001 and Construction Permit 062009-008A.

Month / Year	HAP Measured	Results of the most recent Performance Test			Total Monthly Hours of Operation	Average HAP Emission Factor [4] (lbs/hr)	Monthly HAP Emissions [5] (tons)	12-Month Rolling Total HAP Emissions [6] (tons)
		Flow Rate [1] (CF/hr)	HAP Concentration [2] (lbs/CF)	Current HAP Emission Factor [3] (lb/hr)				
	HAP1 [Name]							
	HAP2 [Name]							
	HAP3 [Name]							
	HAP4 [Name]							
	HAP5 [Name]							
						Total HAP:		
	HAP1 [Name]							
	HAP2 [Name]							
	HAP3 [Name]							
	HAP4 [Name]							
	HAP5 [Name]							
						Total HAP:		

Note 1: Each time a performance test is run, record the flow rate calculated during the performance test according to the requirements of permit condition ***EU7100-001, Monitoring/Recordkeeping Conditions 1)***. Otherwise leave this cell blank.

Note 2: Each time a performance test is run, record the concentration for each HAP measured during the performance test according to the requirements of permit condition ***EU7100-001, Monitoring/Recordkeeping Conditions 2).*** Otherwise leave this cell blank.

Note 3: Each time a performance test is run, calculate a current emission factor by multiplying the Flow Rate by the HAP Concentration. Otherwise leave this cell blank.

Note 4: If a performance test was run during the current month, enter the current emission factor calculated. Otherwise, enter the current average HAP emission factor calculated on Attachment I-3.

Note 5: Calculate monthly emissions by multiplying the Total Monthly Hours of Operation by the Average Emission Factor, divided by 2000.

Note 6: The 12-month rolling total is calculated by adding the Monthly Total HAP Emissions for the current month to the monthly totals for the previous eleven (11) months. A 12-month rolling total of less than 10 tons of any individual HAP and less than 25 tons total HAP indicates compliance.

DUPLICATE THIS FORM AS NEEDED

Attachment F-3

Average Emission Factor Worksheet for Vapor Extraction System Operations

This record keeping sheet or something similar may be used to demonstrate compliance with permit condition EU7100-001 and Construction Permit 062009-008A

Month [1]	VOC Emission Factors (lbs/hr)		HAP1 [Name] Emission Factors (lbs/hr)		HAP2 [Name] Emission Factors (lbs/hr)		HAP3 [Name] Emission Factors (lbs/hr)		HAP4 [Name] Emission Factors (lbs/hr)		HAP5 [Name] Emission Factors (lbs/hr)	
	Current [2]	Average [3]	Current [2]	Average [3]	Current [2]	Average [3]	Current [2]	Average [3]	Current [2]	Average [3]	Current [2]	Average [3]

Note 1: Record the month from Attachments I-1 and I-2 each time a performance is run.
Note 2: Record the current VOC and HAP emission factors calculated from Attachments I-1 and I-2 each time a performance test is run.
Note 3: Calculate an average emission factor by summing all current emission factors recorded and divided by the total number of tests run.

DUPLICATE THIS FORM AS NEEDED

STATEMENT OF BASIS

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

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

1) Intermediate Operating Permit Application, received January 3, 2007; revised December 3, 2009;
2) 2007 Emissions Inventory Questionnaire, received May 20, 2008; and
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*
This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit Revisions
The following revisions were made to construction permits for this installation:

1) Construction Permit 0385-001A, Issued February 26, 1985. This construction permit was superseded by Construction Permit 0390-003. Therefore, no permit conditions were included in the operating permit for this construction permit.
2) Construction Permit 0390-003, Issued March 7, 1990. This equipment has been removed from service and disconnected. A new construction permit would be required to reactivate it. Therefore, no permit conditions were included in the operating permit for this construction permit.

3) Construction Permit 0899-008, Issued May 20, 1999 and Construction Permit #0899-008a, Issued March 13, 2001. This construction permit limited the emissions from equipment installed without a construction permit during the period between 1986 and 1997.
   a) Special Condition 1: This condition limits VOC emissions to less than 40 tons/year from the equipment specifically listed in the permit
   b) Special Condition 2: This condition requires the permittee to maintain records to verify compliance with the 40 ton/year VOC emission limit.
   c) Although Special Condition 1 is included in this operating permit as Permit Condition PW002, no recordkeeping and reporting is required for the specific equipment addressed by this construction permit. Permit Condition PW001 requires that the permittee maintain records for all equipment at the facility and limits the *entire facility* to less than 40 tons/year VOC emissions (voluntary limitation). If the facility maintains compliance with PW001 then it will also maintain compliance with PW002, therefore no additional monitoring, recordkeeping or reporting is required.
4) Construction Permit 062009-008, Issued June 18, 2009. Special Condition 5 of Construction Permit 062009-008A states that the conditions of this permit supersede all special conditions found in the previously issued construction permit (Permit Number 062009-008) from the Air Pollution Control Program. Therefore, none of the special conditions in this construction permit were included in the Operating Permit.
5) Construction Permit 062009-008A, Issued October 29, 2009 (Installation of a Vapor Extraction System).
   a) Special Condition 1: The permit engineer for the Construction Permit confirmed the procedures for calculating current and average emission factors as described on Attachments A, B, and C of the Construction Permit. The reviewer modified the Monitoring / Recordkeeping Requirements for EU7100-001 to detail the methods to be used to record and calculate emission factors within the permit condition. The reviewer incorporated the attachments from the Construction Permit as follows: Attachment A became Attachment F-1, Attachment B became Attachment F-2, and Attachment C became Attachment F-3.
   b) Special Condition 1: The method to be used for calculating the average emission factor requires summing all current emission factors determined by the performance tests and dividing by the total number of performance tests run. This is documented on Attachment F-3. The reviewer modified the Monitoring / Recordkeeping Requirements to require records of Attachment F-3 to be maintained for a minimum of 5 years after the vapor extraction system ceases to operate.
   c) Special Condition 2: The permit engineer for the Construction Permit confirmed that flow measurements were to be obtained on the same frequency as the performance testing described in Special Condition 3.B. and C. The reviewer modified the Monitoring / Recordkeeping Requirements for EU7100-001 to include this frequency.
6) Construction Permit 12008-003, Issued January 7, 2008 (Installation of a Mixer)
   a) Special Condition 1: This special condition limits the facility to emit less than 100 tons of VOC from the installation in any consecutive 12-month period. However, during the review process for the operating permit the permittee agreed to limit the installation VOC emissions to less than 40 tons per year in order to simplify the monitoring and recordkeeping requirements. Therefore Permit Condition PW001 limits the installation to less than 40 tons VOC in any consecutive 12-month period.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart D, *Standards of Performance for Fossil-Fuel-Fired Stem Generators for Which Construction is Commenced After August 17, 1971*
40 CFR Part 60, Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*

40 CFR Part 60 Subpart D is applicable to steam generating units with a rated heat capacity of 250 MM Btu/hour for which construction, reconstruction or modification commenced after August 17, 1971. 40 CFR Part 60 Subpart Db is applicable steam generating units that commence construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 100 MMBtu/hr. These rules were determined not to be applicable to Boiler #1 (EU0010), Boiler #2 (EU0020), and Boiler #3 (EU0030) although these units were installed within the relevant time period because the rated heat capacity of each boiler is less than 100 MM Btu/hr.

40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

This rule is applicable to steam generating units that have a maximum heat input capacity greater than or equal to 10 MMBtu/hr but less than or equal to 100 MMBtu/hr for which construction, modification, or reconstruction is commenced after June 9, 1989. These rules were determined not to be applicable to Boiler #1 (EU0010), Boiler #2 (EU0020), and Boiler #3 (EU0030) although these units were installed within the relevant time period because the rated heat capacity of each boiler is less than 10 MM Btu/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 rule is applicable to tanks storing volatile organic liquids (VOL) with a capacity greater than or equal to 75 m^3 (19,812 Gal).

1) The rule was determined not to be applicable to the five (5) solvent storage tanks (EU2000, EU2005, EU2010, EU2015, and EU2020). These tanks store volatile organic liquids, but each has capacity less than 75m^3. In addition, these tanks were constructed ca 1960 and have not been reconstructed or modified since installation so as to meet the definition under this rule.
2) This rule was determined not to be applicable to the twelve (12) base holding tanks (EU2025, EU2030, EU2035, EU2040, EU2045, EU2050, EU2055, EU2060, EU2065, EU2070, EU2080, and EU2085) or to the portable base holding tanks (EU2075). These tanks store product, prior to additional processing, which may contain volatile organic liquids. However each tank has capacity less than 75m^3.
3) This rule was determined not to be applicable to the twelve (12) resin storage tanks (EU2500, EU2505, EU2510, EU2515, EU2520, EU2525, EU2530, EU2535, EU2540, EU2545, EU2550, and EU2555). These tanks store alkyd and epoxy raw material resins, which may be dispersed in a volatile organic liquid. However each tank has capacity less than 75m^3.
4) This rule was determined not to be applicable to the ten (10) letdown tanks (EU4015, EU4020, EU4025, EU4030, EU4035, EU4040, EU4045, EU4050, EU4055, and EU4060) or to the portable production equipment (EU4065). These tanks have mixers and are primarily used as process tanks, but are also used for temporary storage of products that contain volatile organic liquids. However each tank has a capacity less than 75m^3.

5) This rule was determined not to be applicable to the three (3) process mixers with tanks (EU4000, EU4005, and EU4010). These are primarily used as process tanks, but are also used for temporary storage of products that contain volatile organic liquids. However each tank has a capacity less than $75m^3$.
6) This rule was determined not to be applicable to the solvent recovery still (EU7000) because it is considered to be a process tank. The rule was determined not to be applicable to the solvent recovery still tanks (EU7005 and EU7010) although each is used to store volatile organic liquids because each tank has a capacity less than $75m^3$.

Maximum Available Control Technology (MACT) Applicability

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

This rule is applicable to sources who operate miscellaneous coating manufacturing operations which process, use, or produce hazardous air pollutants (HAP) and are located at or are part of a major source of HAP emissions. This rule was determined not to be applicable to the installation although it manufactures coatings that meet the definition of the rule because Construction Permit #012008-003 established a federally enforceable permit limit which limits HAP emissions to below the major source level.

40 CFR Part 63 Subpart CCCCCCC, *National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing*

This rule became effective on December 3, 2009 and the compliance deadline for existing sources of December 3, 2012 will occur within the effective period of this permit. Any affected source which began construction after June 1, 2009 must be in compliance with the rule by December 3, 2009 or the start-up of the unit, whichever is later.

Emission units subject to this rule include those where the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process occurs. Emission units subject to this rule also include process and storage vessels that store or process materials containing benzene or methylene chloride.

The installation currently handles several pigments and solids which may be subject to the rule. These pigments and solids are handled in existing emission units. The installation does not handle any materials which contain benzene or methylene chloride. Plantwide permit condition PW004 has been included in this permit to provide compliance requirements for emission units determined to be subject to the rule. The permittee is expected to determine whether or not there are emission units subject to the rule by the initial notification deadline. Those units would then be subject to PW004.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
None

Other Regulatory Determinations

10 CSR 10-2.215, *Control of Emissions from Solvent Cleanup Operations*
This rule is applicable to installations that perform any cleaning operation involving the use of a VOC solvent or solvent solution. However, the provisions of this rule are not applicable to installations at which cleaning solvent VOCs are emitted at less than five hundred (500) pounds per day. Once a source is determined to exceed the applicability level of this rule, it remains subject to this rule even if its actual emissions drop below the applicability level. This rule was determined not to be applicable because VOC emissions from cleaning activities do not currently exceed 500 pounds per day and there is no evidence that previous cleaning activities exceeded 500 pounds per day.

10 CSR 10-2.300, *Control of Emissions From the Manufacturing of Paints, Varnishes, Lacquers, Enamels and Other Allied Surface Coating Products*
This regulation applies to installations which have the uncontrolled potential to emit more than two hundred fifty kilograms per day (250 kg/day) or one hundred (100) tons per year of volatile organic compounds (VOC) from the manufacture of paints, varnishes, lacquers, enamels and other allied surface coating products. This rule was determined not to be applicable because Construction Permit #012008-003 established a federally enforceable permit limit which limits VOC emissions to less than 100 tons per year. Construction Permit 062002-014 established plantwide operating conditions that incorporate certain of the provisions of this rule. These are included in PW003, but the regulatory reference is to the construction permit since the rule itself is not applicable.

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

This rule restricts the emission of particulate matter from an industrial process based on the maximum design capacity of that process. The rule was determined not to be applicable to the installation for the following reasons:

1) 10 CSR 10-6.400 exempts emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter. The mixing equipment at the installation was determined to be exempt based on the following calculations:
   - The highest capacity mixer at the installation can process 1,500 gallons of paint per hour.
   - A high solids paint was assumed to have a maximum density of 9.75 pounds per gallon.
   - Therefore the mixer can process (1,700) x (9.75) = 14,625 pounds of paint per hour.
   - A high solids paint was assumed to have a maximum solids content of 90% by weight.
   - This implies that the mixer can process (16,575) x (90%) = 13,162.5 pounds of solids per hour.
   - However, the actual solids addition process takes a minimum of 2 hours.
   - Therefore, the mixer actually processes (14,917.5) / (2) = 6,581.25 pounds of solids per hour.
   - This is (7,458.75) / (2,000) = 3.29 tons per hour.
   - Using an emission factor of 0.134 pounds PM / ton processed from AP-42 Table 11.12-2, the maximum potential emissions rate was calculated to be (0.134) x (3.73) = 0.4409 pounds per hour.
   - Since all other mixers have a capacity of less than 1,700 gallons of paint per hour, it was determined that the maximum emission rate from mixing operations is less than 0.5 pounds per hour.

2) 10 CSR 10-6.400 exempts emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter. The milling equipment at the installation was determined to be exempt based on the following calculations:

- The highest capacity mill at the installation can process 25 gallons of paint per hour.
- A high solids mill grind was assumed to have a maximum density of 10.5 pounds per gallon.
- Therefore the mixer can process (25) x (10.5) = 262.5 pounds of grind per hour.
- A high solids grind was assumed to have a maximum solids content of 90% by weight.
- This implies that the mill can process (262.5) x (90%) = 236.25 pounds of solids per hour.
- The actual solids addition process was assumed to take a minimum of 1 hour.
- Therefore, the mill actually processes (236.25) / (1) = 236.25 pounds of solids per hour.
- This is (236.25) / (2,000) = 0.118 tons per hour.
- Using an emission factor of 0.134 pounds PM / ton processed from AP-42 Table 11.12-2, the maximum potential emissions rate was calculated to be (0.134) x (0.118) = 0.016 pounds per hour.
- Since all other mills have a capacity of less than 25 gallons of mill grind per hour, it was determined that the maximum emission rate from milling operations is less than 0.5 pounds per hour.

3) 10 CSR 10-6.400 exempts emission units that are subject to a federally enforceable requirement to install, operate, and maintain a particulate matter control device system that controls at least ninety percent (90%) of particulate matter emissions. The emission units installed per Construction Permit 012008-003, EU1700, EU1705, EU1710, EU1715, EU1720, and EU1725 are required to control emissions by enclosing all transfer points and using the cartridge filter whenever these units are operated. This cartridge filter was determined in the construction permit to have a control efficiency of 99%. Therefore, this rule was determined not to be applicable to these units.

Emission Units Without Limitations

The installation is a batch process operation which uses a variety of manufacturing equipment. Plant wide permit conditions were used in place of emission unit specific permit conditions wherever appropriate. Many of the emission units without limitations are subject to the requirements for one or more of the plant wide permit conditions. Table 1 presents the requirements determined to apply to each emission unit reviewed for this operating permit.

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
Combustion Equipment														
EU0010	01	Boiler #1	3	Weil McLain 788	Nov 1995	2.049 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0020		Boiler #2	3	Smith; Model GB100W	2001	0.104 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0030		Boiler #3	3	Smith; Model GB100W	2001	0.104 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0050	01	Air Make Up Heating Unit #1	5	King National, 88DF4851	Nov 1988	1.9 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0055	01	Air Make Up Heating Unit #2	5	King National, 88DF4852	Nov 1988	1.9 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0060	01	Space Heater HV-1, New Warehouse	26	Rapid Engineering, 160096	Aug 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0065	01	Space Heater HV-2, New Warehouse	26	Rapid Engineering, 160096	Aug 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0070	01	Space Heater HVAC-1, New Warehouse	26	Carrier, 3885G66195	Aug 1986	0.0924 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0075	01	Space Heater HVAC-2, New Warehouse	26	York, NAXM033528	May 1990	0.041 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0080	01	Space Heater HVAC-3, New Warehouse	26	York, NKWM460064	May 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0085	01	Space Heater HVAC-4, New Warehouse	26	York, NKWM460093	May 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0090	01	Space Heater HVAC-5, New Warehouse	26	York, NAXM026688	May 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0095	01	Space Heater HVAC-6, New Warehouse	26	York, NGWM368140	May 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU0100	01	Space Heater HVAC-7, New Warehouse	26	York, NBXM101878	May 1990	0.162 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0105	01	Space Heater HVAC-7A, New Warehouse	26	Trane, K12167088	Oct 1995	0.08 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0110		Space Heater HV-3, West Dock Area		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0115		Space Heater HV-4, West Dock Area		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0120		Space Heater HV-5, West Dock Area		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0125		Space Heater HV-6, Middle Building		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0130		Space Heater HV-7, Middle Building		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0135		Space Heater HV-8, Middle Building		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0140		Space Heater HV-9, Middle Building		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0145		Space Heater HV-10, Grinnell Building		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0150		Space Heater HV-11, Grinnell Building		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0155		Space Heater HV-12, Grinnell Building		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU0160		Space Heater HV-13, Grinnell Building		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0165		Space Heater HV-14, Grinnell Building		Unknown – similar to EU0055-60	ca 1986	1.5 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0170		Space Heater HVAC-8, Grinnell Roof		Unknown – similar to EU0080-95	ca 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0175		Space Heater HVAC-9, Grinnell Roof		Unknown – similar to EU0080-95	ca 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0180		Space Heater HVAC-10, Tech Service Roof		Unknown – similar to EU0080-95	ca 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0185		Space Heater HVAC-11, Tech Service Roof		Unknown – similar to EU0080-95	ca 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0190		Space Heater HVAC-12, Tech Service Roof		Unknown – similar to EU0080-95	ca 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0195		Space Heater HVAC-13, Tech Service Roof		Unknown – similar to EU0080-95	ca 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0200		Space Heater HVAC-14, Tech Service Roof		Unknown – similar to EU0080-95	ca 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0205		Space Heater HVAC-15, Tech Service Roof		Unknown – similar to EU0080-95	ca 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0210		Space Heater HVAC-16, Tech Service Roof		Unknown – similar to EU0080-95	ca 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
EU0215		Space Heater HVAC-17, Tech Service Roof		Unknown – similar to EU0080-95	ca 1990	0.103 MM Btu/hr	Yes	N/A	N/A	N/A	X (VOC)			
Production Mixers														

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU1000	01	Mixer #1/2/3 (Tk 1)	8	Scholds, VHS-601	Jun 1989	40 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1005	01	Mixer #1/2/3 (Tk 2)	8	Scholds, VHS-601	Jun 1989	40 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1010	01	Mixer #1/2/3 (Tk 3)	8	Scholds, VHS-601	Jun 1989	40 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1015	01	Mixer #4/5 (Tk 4)	8	Morehouse, 720-VHV	Feb 1969	17 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1020	01	Mixer #4/5 (Tk 5)	8	Morehouse, 720-VHV	Feb 1969	17 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1025	01	Mixer #6/7 (Tk 6)	8	Morehouse, 520-VHV	Nov 1963	11 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1030	01	Mixer #6/7 (Tk 7)	8	Morehouse, 520-VHV	Nov 1963	11 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1045	01	Mixer #10/11 (Tk 10)	8	Meyers, 850A-75-75	Apr 1986	93 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1050	01	Mixer #10/11 (Tk 11)	8	Meyers, 850A-75-75	Apr 1986	93 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1055	08	Mixer #TMS25 (High Solids)	8	Scholds, VLS-400	Aug 1991	14 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1060	08	Mixer #TMS26 (High Solids)	8	Scholds, VLS-400	Feb 1986	25 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1065	08	Mixer #TMH27 (High Solids)	8	Scholds, VLS-400	May 1985	12 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1070	08	Mixer #TMH28 (High Solids)	8	Scholds, 54453	May, 1997	16 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1075	09	Mixer #HS12	8	Meyers, 775A-10	Sep 1981	12 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1080	09	Mixer #HS13	8	Meyers, W-24X	Sep 1981	12 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1085	10	Bay Mixer #1	8	Meyers, H200-15-835	Nov 1981	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1090	10	Bay Mixer #2	8	Meyers, H200-15-835	Nov 1981	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1095	10	Bay Mixer #3	8	Meyers, H200-15-835	Nov 1981	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1100	10	Bay Mixer #4	8	Meyers, H200-15-835	Nov 1981	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU1105	10	Bay Mixer #5	8	Meyers, H200-15-835	Nov 1981	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1110	10	Bay Mixer #6	8	Meyers, H200-15-835	Nov 1981	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1115	10	Bay Mixer #7	8	Meyers, H200-15-835	Nov 1981	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1120	10	Bay Mixer #8	8	Meyers, H200-15-835	Nov 1981	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1125		Bay Mixer #9	8	Meyers H200-20-155	Feb 2009	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1130		Bay Mixer #10	8	Meyers H200-20-155	Feb 2009	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1135		Bay Mixer #11	8	Meyers H200-20-155	Feb 2009	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1140		Bay Mixer #12	8	Meyers H200-20-155	Feb 2009	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1145		Cowles Pigment Dissolver	8	Cowles, Model 520-VHV	ca 2000	12 Gal/hr	N/A	N/A	X (3)	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1150		Reynold Dual Shaft Mixer	8	Reynold S/N TN1846	Oct 2001	20.6 Gal/hr	N/A	N/A	X (4)	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1155		Shar High Speed Disperser	8	Shar S/N05314001	Jul 2001	13.74 Gal/hr	N/A	N/A	Not required	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1160		Shar High Speed Mixer	8	Shar S/N 09312801	Oct. 2001	77 Gal/hr	N/A	N/A	Not required	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1165		Dual Shaft Hockmeyer High Speed Disperser	8	Hockmeyer M/N99-3613	Oct 2001	12.5 Gal/hr	N/A	N/A	Not required	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1170		Hockmeyer Dual Shaft 300 Horse Mixer	8	Hockmeyer S/N 4383/12/07	Apr 2008	70 Gal/hr	N/A	N/A	X (6)	< 0.5 lb/hr	X (VOC & HAP)		X	
Shade / Tint Mixers														
EU1400	05	Mixer #HS20 (Shade)	8	Morehouse, W-24X	Dec 1979	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1405	05	Mixer #HS21 (Shade)	8	Cyuga, L7BVS19-25	Feb 1972	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU1410	05	Mixer #HS22 (Shade)	8	Meyers, 775A-10	Sep 1981	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1415	05	Mixer #HS24 (Shade)	8	Morehouse, W-24X	Sep 1981	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1420	08	Small Air Mixer #2	8	Fawcett Co.	Apr 1989	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1425	08	Small Air Mixer #3	8	Fawcett Co.	Sep 1991	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1430	08	Small Air Mixer #4	8	Fawcett Co.	Sep 1991	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1435	08	Small Air Mixer #5	8	Grovac 1305	Jul 1996	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1440	11	Small Air Mixer #1	8	Fawcett Co., 104A	Feb 1982	1 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1445	11	Small Air Mixer #2	8	Fawcett Co., 104A	Feb 1982	1 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1450	11	Small Air Mixer #3	8	Fawcett Co., 104A	Aug 1986	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1455	11	Small Air Mixer #4	8	Fawcett Co., 104A	Jul 1955	1 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1460	11	Small Air Mixer #5	8	Fawcett Co., 104A	May 1987	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1465	11	Small Air Mixer #6	8	Fawcett Co., 104A	Oct 1988	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1470	11	Small Air Mixer #7	8	Fawcett Co., 104A	Nov 1989	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1475	11	Small Air Mixer #8	8	Fawcett Co., 104A	Aug 1990	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1480	11	Small Air Mixer #9	8	Fawcett Co., 105B	Nov 1990	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1485	11	Small Air Mixer #10	8	Fawcett Co., 305	Mar 1993	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1490	11	Small Air Mixer #11	8	Fawcett Co., 102	Nov 1995	1 Gal/hr	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1495	12	Colorant Dispenser #3	8	Harbil, 16DP232	Jan 1984		N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU1500		Small Air Mixer #12	8	Grovac 1305	ca 2001	2.5 Gal/hr	N/A	N/A	Not required,	< 0.5 lb/hr	X (VOC & HAP)	X	X	

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU1505		Small Air Mixer #13	8	Grovac 1306	ca 2001	2.5 Gal/hr	N/A	N/A	but determi-nation references limits to (1).	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1510		Small Air Mixer #14	8	Grovac 1305	ca 2001	2.5 Gal/hr	N/A	N/A		< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU1515		Small Air Mixer #15	8	Grovac 1306	ca 2001	2.5 Gal/hr	N/A	N/A		< 0.5 lb/hr	X (VOC & HAP)	X	X	
Putty Mixers														
EU1900	15	Putty Machine #1	8	U.S. Varadrive VEVSEVGY	Mar 1980	3 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)			
EU1905	15	Putty Machine #2	8	Unknown	Apr 1978	10 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)			
EU1910	15	Aluminum Blend #1	8	Custom (Tnemec) fabricated	Dec 1978	19 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)			
Storage Tanks														
EU2000		Solvent Storage Tank #1 (Xylene)	40	Vertical fixed roof aboveground storage tank	ca 1960	14,000 gallons	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU2005		Solvent Storage Tank #2 (Mineral Spirits)	41	Vertical fixed roof aboveground storage tank	ca 1960	4,000 gallons	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU2010		Solvent Storage Tank #3 (n-Butyl Alcohol)	42	Vertical fixed roof aboveground storage tank	ca 1960	4,000 gallons	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU2015		Solvent Storage Tank #4 (Methyl Isobutyl Ketone)	43	Vertical fixed roof aboveground storage tank	ca 1960	4,000 gallons	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU2020		Solvent Storage Tank #5 (Methyl Ethyl Ketone)	44	Vertical fixed roof aboveground storage tank	ca 1960	4,000 gallons	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU2025	41	Base Holding Tank #1 (Storage)	8	Lightnin, 91Q3	Jun 1985	1,000 gallons	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU2030	41	Base Holding Tank #2 (Storage)	8	Lightnin, 91Q3	Jun 1985	2,000 gallons	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU2035	41	Base Holding Tank #3 (Storage)	8	Lightnin, 91Q3	Jun 1985	2,000 gallons	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU2040	41	Base Holding Tank #4 (Storage)	8	Lightnin, 91Q3	Nov 1972	1,600 gallons	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU2045	41	Base Holding Tank #5 (Storage)	8	Lightnin, 14-O-3	Nov 1972	1,600 gallons	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU2050	41	Base Holding Tank #6 (Storage)	8	Lightnin, 14-O-3	Nov 1972	1,600 gallons	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU2055	41	Base Holding Tank #7 (Storage)	8	Lightnin, 91Q3	Nov 1972	1,600 gallons	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU2060	41	Base Holding Tank #8 (Storage)	8	Lightnin, 14-O-3	Nov 1972	1,600 gallons	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU2065	41	Base Holding Tank #10 (Storage)	8	Perfection Gear Co. RS225B	Jun 1985	1,000 gallons	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU2070	41	Base Holding Tank #11 (Storage)	8	Perfection Gear Co. RS225B	Jun 1985	1,000 gallons	N/A	N/A	X (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU2075	42	Portable Base Holding Containers	8	Various 5, 10, 30, 55-gallon containers, and tubs			N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & HAP)		X	
EU2080		Base Holding Tank #15A (Storage)	8	S/N 34389-1	Sep 2002	350 gallons	N/A	N/A	Like-kind replace-ment for equipment subject to (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU2085		Base Holding Tank #16A (Storage)	8	S/N 34389-2	Sep 2002	350 gallons	N/A	N/A	Like-kind replace-ment for equipment subject to (1) & (2)	< 0.5 lb/hr	X (VOC & HAP)	X	X	
EU2500		Resin Storage Tank #1	8	1st floor: Epoxy or alkyd resin storage tank, may contain solvent.	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	
EU2505		Resin Storage Tank #2		1st floor: Epoxy or alkyd resin storage tank	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	
EU2510		Resin Storage Tank #3		1st floor: Epoxy or alkyd resin storage tank	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	
EU2515		Resin Storage Tank #4		1st floor: Epoxy or alkyd resin storage tank	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	
EU2520		Resin Storage Tank #5		1st floor: Epoxy or alkyd resin storage tank	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	
EU2525		Resin Storage Tank #6		1st floor: Epoxy or alkyd resin storage tank	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	
EU2530		Resin Storage Tank #7		1st floor: Epoxy or alkyd resin storage tank	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	
EU2535		Resin Storage Tank #8		1st floor: Epoxy or alkyd resin storage tank	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	
EU2540		Resin Storage Tank #9		2nd floor: Epoxy or alkyd resin storage tank	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	
EU2545		Resin Storage Tank #10		2nd floor: Epoxy or alkyd resin storage tank	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU2550		Resin Storage Tank #11		2nd floor: Epoxy or alkyd resin storage tank	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	
EU2555		Resin Storage Tank #12		2nd floor: Epoxy or alkyd resin storage tank	ca 1980	2,500 gallons	N/A	N/A	N/A	N/A	X (VOC & HAP)		X	
Mills														
EU3000		Hockmeyer Basket Media Mill	8	Hockmeyer	ca 2001	15 Gal/hr	N/A	N/A	Like-kind replace-ment for equipment subject to (1) & (2)	< 0.5 lb/hr	X (VOC & (HAP)	X		
EU3100	06	Ball Mill #1	8	Patterson	Apr 1950	3 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & (HAP)			
EU3105	06	Ball Mill #2	8	Patterson	Dec 1948	3 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & (HAP)			
EU3110	06	Ball Mill #5	8	Patterson	Jul 1969	25 Gal/hr	N/A	N/A	N/A	< 0.5 lb/hr	X (VOC & (HAP)			
Process Tanks														
EU4000	03	Mixer #RW1 (Water Base)	8	Meyers, 600/350-75-832	May 1985	2,000 gallons	N/A	N/A	N/A	N/A	N/A		X	
EU4005	03	Mixer #RW2 (High Solids, Low VOC)	8	Meyers, 600/350-75-832	Apr 1986	1,100 gallons	N/A	N/A	X (5)	N/A	X (VOC & (HAP)		X	
EU4010	03	Mixer #RW3 (Water Base)	8	Meyers, 600/500-50-885	Apr 1986	2,000 gallons	N/A	N/A	N/A	N/A	N/A		X	
EU4015	14	Letdown Tank #1	8	Lightnin	May 1981	90 Gal/hr	N/A	N/A	N/A	N/A	X (VOC & (HAP)		X	
EU4020	14	Letdown Tank #2	8	Lightnin	May 1981	186 Gal/hr	N/A	N/A	N/A	N/A	X (VOC & (HAP)		X	

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU4025	14	Letdown Tank #3	8	Lightnin	Apr 1982	186 Gal/hr	N/A	N/A	N/A	N/A	X (VOC & (HAP)		X	
EU4030	14	Letdown Tank #4	8	Lightnin	Apr 1982	41 Gal/hr	N/A	N/A	N/A	N/A	X (VOC & (HAP)		X	
EU4035	14	Letdown Tank #5	8	Lightnin	Apr 1982	52 Gal/hr	N/A	N/A	N/A	N/A	X (VOC & (HAP)		X	
EU4040	14	Letdown Tank #6	8	Lightnin	Apr 1982	52 Gal/hr	N/A	N/A	N/A	N/A	X (VOC & (HAP)		X	
EU4045	14	Letdown Tank #7	8	Lightnin	Apr 1982	94 Gal/hr	N/A	N/A	N/A	N/A	X (VOC & (HAP)		X	
EU4050	14	Letdown Tank #8	8	Lightnin	Apr 1982	94 Gal/hr	N/A	N/A	N/A	N/A	X (VOC & (HAP)		X	
EU4055	14	Letdown Tank #9	8	Lightnin	Apr 1982	63 Gal/hr	N/A	N/A	N/A	N/A	X (VOC & (HAP)		X	
EU4060	14	Letdown Tank #10	8	Silverstreak	Apr 1982	32 Gal/hr	N/A	N/A	N/A	N/A	X (VOC & (HAP)		X	
EU4065		Portable production equipment		Various 5, 10, 30, 55-gallon containers, and tubs			N/A	N/A	N/A	N/A	X (VOC & (HAP)		X	
Paint Filling Equipment														
EU5000	13	Gallon Can Filling Machine	8	Thiele Eng., AF-1T-B1	Sep 1977		N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5005	13	Twin 5-Gallon Pail Weigh Filler	8	Neupak, M3763-1	Jun 1996		N/A	N/A	X (1) & (2)	N/A	X (VOC & (HAP)	X		
EU5010	13	Handfill Thinner Manifold	8	None	Jun 1981		N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5015		Neupack 4-head paint filling machine	8	Neupak	ca 1998	2400 Gal/hr	N/A	N/A	Not required	N/A	X (VOC & (HAP)			
Fillers														
EU5100	16	Putty Filler #1	8	Graco 5:1 #205-997	Feb 1996	55 gallons	N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5105	16	Putty Filler #2	8	Graco 20:1 #207-279	Apr 1980	55 gallons	N/A	N/A	N/A	N/A	X (VOC & (HAP)			

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU5110	45	Filler Pot #1	8	N/A	Apr 1950	15 gallons	N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5115	45	Filler Pot #2	8	N/A	Apr 1950	15 gallons	N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5120	45	Filler Pot #3	8	N/A	Apr 1950	15 gallons	N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5125	45	Filler Pot #4	8	N/A	Apr 1950	15 gallons	N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5130	45	Filler Pot #5	8	N/A	Apr 1971	15 gallons	N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5135	45	Filler Pot #6	8	N/A	Jul 1972	15 gallons	N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5140	45	Filler Pot #7	8	N/A	Feb 1981	15 gallons	N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5145	45	Filler Pot #8	8	N/A	Apr 1983	15 gallons	N/A	N/A	X (1) & (2)	N/A	X (VOC & (HAP)	X		
EU5150	45	Filler Pot #9	8	N/A	May 1986	15 gallons	N/A	N/A	X (1) & (2)	N/A	X (VOC & (HAP)	X		
EU5155	45	Filler Pot #10	8	N/A	Feb 1988	15 gallons	N/A	N/A	X (1) & (2)	N/A	X (VOC & (HAP)	X		
EU5160	45	Filler Pot #11	8	N/A	Jun 1991	15 gallons	N/A	N/A	X (1) & (2)	N/A	X (VOC & (HAP)	X		
Strainers														
EU5200	44	Strainer #1	8	Russell Finex, 16350	Apr 1971		N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5205	44	Strainer #2	8	Russell Finex, 16350	Jul 1972		N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5210	44	Strainer #3	8	Russell Finex, 16350	Feb 1981		N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU5215	44	Strainer #4	8	Russell Finex, 16350	Apr 1983		N/A	N/A	X (1) & (2)	N/A	X (VOC & (HAP)	X		
EU5220	44	Strainer #5	8	Russell Finex, 16350	May 1986		N/A	N/A	X (1) & (2)	N/A	X (VOC & (HAP)	X		
EU5225	44	Strainer #6	8	Russell Finex, 16350	Feb 1988		N/A	N/A	X (1) & (2)	N/A	X (VOC & (HAP)	X		
EU5230	44	Strainer #7	8	Russell Finex, 16350	Jun 1991		N/A	N/A	X (1) & (2)	N/A	X (VOC & (HAP)	X		

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
Cleaning Equipment														
EU6000		Portable solvent wash containers		Various 5, 10, 30, 55-gallon containers, and tubs			N/A	N/A	X (1) & (2)	N/A	X (VOC & (HAP)	X		
EU6005		Cold Solvent Parts Washer		Crystal Clean		30 gallon	N/A	X	N/A	N/A	X (VOC)			
Still & Associated Equipment														
EU7000	SCR - Still	Still	8	S/N SCR-550E	Sep 2002	806 gallons	N/A	N/A	X (5)	N/A	X (VOC & (HAP)	X		
EU7005	DST - dirty	Still Tank #1	8	S/N 2440-DST	Sep 2002	3,000 gallons	N/A	N/A	X (5)	N/A	X (VOC & (HAP)	X	X	
EU7010	CST - clean	Still Tank #2	8	S/N 2440-CST	Sep 2002	3,000 gallons	N/A	N/A	X (5)	N/A	X (VOC & (HAP)	X	X	
EU7015	Drum	Sludge Disposal Drums	8	N/A	Sep 2002	55 gallons	N/A	N/A	X (5)	N/A	X (VOC & (HAP)	X		
Remediation Equipment														
EU7100		Accelerated Remediation Technologies Vapor Extraction System	VE	Dynamic Subsurface Circulation System	2009		N/A	N/A	X (7) & (8)	N/A	X (VOC & (HAP)			
R&D Laboratory Equipment														
EU8000	01	Spray Booth, 1st Floor (R&D)	20	Binks BB-4-RS	Mar 1964		N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU8005	01	Spray Booth, 2nd Floor (R&D)	21	Sprayking SSN 68-1	Feb 1977		N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU8010	01	R&D Large Spray Booth	31	Sprayking LDI 72C	May 1990		N/A	N/A	N/A	N/A	X (VOC & (HAP)			
EU8015		R&D Grit Blasting Cabinet			ca 2001		N/A	N/A	Not required	N/A	N/A	N/A	EU8015	

Emission Unit (EU)	Old Emission Unit ID	Equipment Name	EIQ EP	Model / Serial Number	Month / Year Installed	Design Capacity (Units)	10 CSR 10-2.040	10 CSR 10-2.210	10 CSR 10-6.060 [1]	10 CSR 10-6.400	PW001	PW002	PW003	PW004 [2]
EU8020		R&D Hockmeyer High-Speed Disperser		Hockmeyer	ca 2001		N/A	N/A	Not required	N/A	X (VOC & (HAP)			

[1] Construction Permits are referenced as follows:
(1) Construction Permit #0899-008, Issued May 20, 1999.
(2) Construction Permit #0899-008a, Issued March 13, 2001.
(3) Construction Permit #012000-003, Issued December 15, 1999.
(4) Construction Permit #092001-001, Issued July 27, 2001.
(5) Construction Permit #062002-014, Issued June 11, 2002.
(6) Construction Permit #012008-003, Issued January 7, 2008.
(7) Construction Permit #062009-008, Issued June 18, 2009.
(8) Construction Permit Amendment #062009-008a, Issued October 28, 2009.

"Not Required" means that an applicability determination was issued by the MDNR indicating that a construction permit was not required.
"N/A" means that the equipment was not required to obtain a permit because it is exempt from the rule, and/or it was installed prior to the effective date of the rule, and/or the facility determined that it was essentially similar to a previously issued applicability determination.

[2] Equipment subject to the PW004 has not yet been determined, although the effective date of the rule will occur during the period covered by this operating permit.

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

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

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

Prepared by:

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Environmental Engineer