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Air Enforcement: Missouri Department of Natural Resources and Jackson County Lighting Systems Manufacturing Plant Enter into Administrative Order on Consent

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The Missouri Department of Natural Resources (“MDNR”) and Peterson Manufacturing Company (“Peterson”) entered into an August 22nd Administrative Order on Consent (“AOC”) addressing alleged violations of an air permit. See No. APCP-2023-031.

The AOC provides that Peterson owns and operates a vehicles safety lighting systems and accessories manufacturing plant (“Plant”) in Jackson County, Missouri.

An inspector from MDNR is stated to have conducted a routine compliance inspection on January 17, 2023, of the Plant. The inspector is stated to have identified the following violations:

- Failure to submit an operating permit renewal application at least six months prior to the expiration date.
- Failure to conduct inspection of the solids discharge valve on the fluidized bed cyclone at least once a week and record the results of each weekly inspection.
- Failure to record pressure drop across the autobody refinishing spray paint booth filter at least once every 24 hours while operating.
- Failure to maintain an operating and maintenance log for the autobody refinishing spray paint booth filters.
- Failure to conduct annual training for solvent cleaning equipment operators.
- Failure to calculate the monthly and rolling 12-month Hazardous Air Pollutant emissions for each individual HAP and total combined HAP.
- Failure to calculate the monthly emissions of Volatile Organic Compounds for each emission unit and the 12-month rolling total of VOC emissions.
- Failure to calculate monthly emissions of VOC and 12-month rolling total emissions of VOC for autobody refinishing spray paint booth and general maintenance spray paint booth.
- Failure to conduct observations for visible air emissions.
- Failure to conduct monitoring for fugitive particulate matter emissions beyond the property boundaries.

The AOC provides that since January 13, 2023, Peterson has returned or taken steps to return to compliance.

These steps have included:

- Submission of a renewal application for the operating permit.
- Began conducting monthly inspections on the fluidized bed cyclone.
- Began recording pressure drop across filters once every 24 hours.
- Started maintaining the operating and maintenance log for the autobody refinishing spray booth filters.
- Conducted parts washer training in February of 2023.
- Updated and submitted total and rolling VOC and HAP emissions.
- Began conducting opacity observations for visible air emissions.
- Began conducting monitoring for fugitive particulate matter emissions beyond the property of origin.
- Delivered the missing 12-month rolling total HAP emissions from September 2017 through March 2022.

The AOC assesses a civil penalty in the amount of \$198,125.00. However, \$158,500.00 is suspended on the condition that there are no violations of the AOC, the Missouri Air Conservation Law, or its regulations during the two-year period following the effective date of the AOC.

A copy of the AOC can be downloaded [here](#).