



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 082009-006 Project Number: 2009-06-050

Parent Company: Tracker Marine Group

Parent Company Address: 2500 East Kearney, Springfield, MO 65898

Installation Name: Tracker Marine - Lebanon Plant

Installation Address: 1500 Maple Lane, Lebanon, MO 65536

Location Information: Laclede County, S14, T34N, R16W

Application for Authority to Construct was made for:
Construction of a dual paint booth (EP-10[seg.3], single paint booth (EP-10[seg.4])) and plasma cutters (EP-11[seg.1 and seg.2]) in the former Myacht building (to be renamed Plant #2). This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

AUG 19 2009

EFFECTIVE DATE

Steven J. Jellison for JLK

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the departments' Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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Project No.	2009-06-050

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Tracker Marine - Lebanon Plant
Laclede County, S14, T34N, R16W

1. **Superseding Condition**
The conditions of this permit supersede Special Condition 2 and 3 found in the previously issued construction permit (Permit Number 022009-003) from the Air Pollution Control Program.
2. **Emission Limitation – Volatile Organic Compounds (VOCs)**
 - A. Tracker Marine - Lebanon Plant shall emit less than 250.0 tons of VOCs from the installation in any consecutive 12-month period. This limit applies to the VOC emissions from all equipment/ processes installed or permitted at the Tracker Marine - Lebanon Plant as of the issuance date of this permit.
 - B. Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A. Tracker Marine - Lebanon Plant shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in conjunction with all emission points.
 - C. Tracker Marine - Lebanon Plant shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2.B indicate that the source exceeds the limitation of Special Conditions Number 2.A.
3. **Use of Alternative Coatings in Paint Booths EP-10[Seg.1], EP-10[Seg.3] and EP-10[Seg.4]**
 - A. When considering using an alternative material in the paint booths that is different than the materials listed in the Application for Authority to Construct, Tracker Marine - Lebanon Plant shall calculate the potential emissions of volatile organic compounds (VOCs) in the alternative

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

material.

- B. Tracker Marine - Lebanon Plant shall seek approval from the Air Pollution Control Program before use of the alternative material in the following cases:
- i. For EP-10[Seg.1], if the potential VOC emissions for the alternative material is equal to or greater than 43.8 tons per year (tpy) for the paint, 16.5 tpy for the hardener or 19.0 tpy for the primer.
 - ii. For EP-10[Seg.3], if the potential VOC emissions for the alternative material is equal to or greater than 62.5 tpy for the paint or 39.1 tpy for the primer.
 - iii. For EP-10[Seg.4], if the potential VOC emissions for the alternative material is equal to or greater than 57.0 tpy for the paint, 2.7 tpy for the hardener, 36.3 tpy for the primer, 1.75 tpy for the polyurea liner or 28.1 tpy for the camouflage paint combined.
- C. Attachment B or an equivalent form shall be used to show compliance with Special Condition 3.A and 3.B. Tracker Marine - Lebanon Plant shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
4. Control Device –Filters
When either paint booths (EP-10[Seg.3]) or (EP-10[Seg.4]) is operating, Tracker Marine shall control Particulate Matter less than ten microns in diameter (PM₁₀) using the following filters as specified in the permit application. The filters shall be operated and maintained in accordance with the manufacturer's specifications.
- MAT filter (C-1G), fabric filter (C-1H) and fiberglass filter (C-1I) for EP-10[Seg.3]
 - MAT filter (C-1J), fabric filter (C-1K) and fiberglass filter (C-1L) for EP-10[Seg.4]
5. Solvent and Cleaning Cloths
Tracker Marine - Lebanon Plant shall keep the solvent and cleaning solutions in sealed containers whenever the materials are not in use. Tracker Marine - Lebanon Plant shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with this equipment.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2009-06-050
Installation ID Number: 105-0046
Permit Number:

Tracker Marine - Lebanon Plant
1500 Maple Lane
Lebanon, MO 65536

Complete: June 17, 2009

Parent Company:
Tracker Marine Group
2500 East Kearney
Springfield, MO 65898

Laclede County, S14, T34N, R16W

REVIEW SUMMARY

- Tracker Marine - Lebanon Plant (Tracker Marine) has applied for authority to install a dual paint booth (EP-10[Seg.3], single paint booth (EP-10[Seg.4])) and plasma cutters (EP-11[seg.1 and seg.2]) in the former Myacht building (to be renamed Plant #2)
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are ethylbenzene (CAS # 100-41-4), isomers of xylene (CAS # 1330-20-7), cobalt compounds, methyl isobutyl ketone (CAS # 108-10-1), toluene (CAS # 108-88-3), hexamethylene diisocyanate (CAS # 822-06-0), phosphorous compounds, 4,4'-methylenediphenyl diisocyanate (MDI, CAS # 101-68-8) and chromium compounds.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to the proposed equipment.
- The installation-wide 10 ton individual and 25 ton combined annual HAP limitations from Permit No. 022009-003 have been superceded in this permit making Tracker Marine a major source with regards to HAPs. Since Tracker is now considered a major source of HAPs, the Maximum Achievable Control Technology (MACT) standard, 40 CFR Part 63, Subpart VVVV, *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing* and Subpart III, *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production* apply to the facility.
- A MAT filter (C-1G), fabric filter (C-1H) and fiberglass filter (C-1I) are being used

to control PM₁₀ emissions from paint booth (EP-10[Seg.3]). A MAT filter (C-1J), fabric filter (C-1K) and fiberglass filter (C-1L) are being used to control PM₁₀ emissions from paint booth (EP-10[Seg.4])

- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs and HAPs for this project are above major source levels; however, potential emissions of VOCs for the installation are conditioned to less than major levels. All other pollutants are below de minimis levels.
- This installation is located in Laclede County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed for this review. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions.
- Emissions testing is not required for the new equipment.
- A Part 70 Operating Permit application is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Tracker Marine operates an aluminum boat manufacturing installation in Lebanon, Missouri (Laclede County). Raw materials are brought to the installation, cut to appropriate sizes and welded together. Additional materials are added to the craft, including floatation foaming for buoyancy, various pumps and other assorted watercraft necessities. The boat is then wiped down with a toluene solution before being painted in paint booths. The painted boats are then transferred into ovens to allow the paint to cure. After drying, glue is sprayed into the interior and covered with carpeting. Finally, the entire boat is assembled, including attaching the engine and fuel tanks to the main assembly. The final product is then taken to an on-site storage yard to await shipping to customers.

Tracker Marine submitted a renewal to the installation's Intermediate Operating Permit on November 19, 2007 which is currently under Technical Review. This renewal however, does not take into account the removal of the HAP limitations which now makes them a major source for HAPs. Therefore, Tracker Marine will be required to submit a Part 70 Operating Permit Application.

The following Construction permits have been issued to Tracker Marine - Lebanon Plant from the Air Pollution Control Program.

Table 1: Previously Issued Construction Permits

Permit Number	Description
0497-017	Installation of an aluminum boat manufacturing facility
0599-005	Installation of a new paint booth
042001-007	Modification to 0497-017 for an increase in VOC emissions restrictions
072003-017	Installation of a new paint booth
072003-017A	Alternative VOC reporting
022009-003	Installation of a new paint booth (EP-10[Seg.1]) and heat treat oven (EP-11)

PROJECT DESCRIPTION

The Tracker Marine Group (Tracker Marine) seeks authority to move three paint booths (one dual booth and one single booth), two heated/drying ovens and one plasma cutter from the Boat Plant in Bolivar to Plant #2 at the Boat Plant in Lebanon. The paint booths will be used for priming and painting aluminum boats. The plasma cutter will be used for cutting boat parts. In addition, Tracker would like to permit a plasma cutter from the main manufacturing building (Plant #1) that had not been previously permitted.

Due to the proximity in timing of Permit No. 022009-003 (Project No. 2008-11-052) and this project (Project No. 2009-06-050), the potential emissions of both projects will be combined for permit type determination. In the previous project, Tracker Marine installed a new paint booth (EP-10[seg.1]) and a heat treat oven (EP-11). Information relating to the process description and emissions evaluation for these pieces of equipment can be found in Permit No. 022009-003.

Tracker Marine has requested to remove the 10 ton individual and 25 ton combined annual HAP limitations from Permit No. 022009-003. As a result this facility will become subject to the MACT standard, Subpart VVVV. Since this facility is subject to a MACT, this project is not subject to the requirements of Missouri Rule 10 CSR 10-6.060, Section (9), *Hazardous Air Pollutant Permits* even though the potential to emit for several individual HAPs and the combined HAPs exceed the major source levels of 10.0/25.0 tons per year, respectively.

Dual Paint Booth (EP-10[seg.3])

The dual paint booth (EP-10[seg.3]) is comprised of two chambers: one chamber to apply primer and another chamber to apply paint. Each chamber has an associated stack (stacks S-1F and S-1G). The boats will be wiped down with toluene (EP-10A[seg.3]) before being primed and painted. PM₁₀ emissions will be captured with filters before exiting the stack. After painting at EP-10[seg.3], each boat will be dried within a heated/drying oven fueled by propane. The oven has a maximum design rate of 1.5 million British thermal units (Btus) per hour. (Note: The toluene wipe is considered a different emission point than the paint booth.)

The amount of primer, paint and toluene used per boat are derived from historical usage

data and the projected production rate of one new boat line. The maximum hourly design rates are based on usage of 0.73 gallons of paint, 0.35 gallons of primer and 0.25 gallons of toluene per boat. The maximum boat production for this line is one boat every 15 minutes.

Single Paint Booth (EP-10[seg.4])

The single paint booth (EP-10[seg.4]) is comprised of one chamber to apply primer, hardener, paint or a polyurea liner. The chamber has an associated stack (S-1H). The boats will be wiped down with toluene (EP-10A[seg.4]) before being primed and painted.

PM₁₀ emissions will be captured with filters before exiting the stack. After painting at EP-10[seg.4], each boat will be dried within a heated/drying oven fueled by propane. The oven has a maximum design rate of 1.5 million British thermal units (Btus) per hour. (Note: The toluene wipe is considered a different emission point than the paint booth.)

The amount of primer, hardener, paint, polyurea liner and toluene used per boat are derived from historical usage data and projected production rate of three new boat lines.

These three boat lines are different than the boat line to be painted in EP-10[seg.3] and require different amounts of coatings. The maximum hourly design rates are based on usage of 1.33 gallons of paint, 0.65 gallons of primer, 0.0665 gallons of hardener, 1.5 gallons of polyurea coating and 0.25 gallons of toluene per boat. The maximum boat production combined for these lines is one boat every 30 minutes. Tracker Marine estimates that less than 8 percent of the total boats produced will receive a polyurea liner. Since no limits are being put on the amount of boats receiving the liner, the potential emission assume that all boats will receive the liner.

Tracker Marine is also planning to paint a portion of the boats receiving a base coat in EP-10[seg.4]) with additional camouflage paint. They estimate that approximately 16 percent of the boats in EP-10[seg.4]) will also be painted with two types of camouflage paint and 2.5 percent of the boats will receive a third type of camouflage paint. Since no limits are being put on the amount of boats to be painted with camouflage paints, the potential emissions assume that all boats will receive all three types of camouflage paint. The maximum hourly design rates are based on usage of 0.88 gallons of marsh green, 0.65 gallons of charcoal green, and 0.33 gallons of mud brown per boat.

Plasma Cutters (EP-11[seg.1]) and (EP-11[seg.2])

A current on-site plasma cutter (EP-11[seg.1]) is located in Plant #1. Tracker Marine has requested that the plasma cutter be included with this project. The plasma cutter was installed in 2000 and has a maximum operation cutting speed of 25,800 inches per hour. However, its maximum hourly design rate (MHDR) is limited by the number of boats that can be produced in the year. Tracker Marine estimates that the plasma cutter will perform approximately 875.2 inches of cut per boat. With one boat produced every 15 minutes, the limited MHDR is equal to 3500.8 inches cut per hour.

The other plasma cutter is being transferred from the Bolivar facility to Lebanon Plant #2 (EP-11[seg.2]). It has a maximum operation cutting speed of 14,056 inches per hour. Tracker Marine estimates that the plasma cutter will perform approximately 6,255.2 inches of cut per boat. With one boat produced every 30 minutes, the limited MHDR is equal to 12,512.4 inches cut per hour.

EMISSIONS/CONTROLS EVALUATION

The project's potential emissions are primarily VOCs and HAPs that are associated with the new spray booths (EP-10[seg.3]), (EP-10[seg.4]) and toluene wipe (EP-10A). Potential emissions were estimated using a mass balance approach and information obtained from the Material Safety Data Sheets (MSDS). 100 percent of the VOC and HAP content of the paints, primers, hardeners, polyurea liner and toluene are assumed to be emitted into the atmosphere. PM₁₀ emissions from the application of the coatings were evaluated based on the solids content of the paint and the transfer efficiency from electrostatic spray application. A 65 percent transfer efficiency was given by the manufacturer. If not specifically stated in the MSDS, the solids content of the material was estimated by taking the density of the material and subtracting out the volatile content. The remainder was assumed to be PM₁₀. The combined control/capture efficiency of 96% was given for use of three filters in series in the paint booth. The potential emissions for total VOCs, combined HAPs, each individual HAPs and PM₁₀ were evaluated based on the worst case potential emissions for each type of coating.

The emission factor for the plasma cutter was derived from a 1994 study by the American Welding Society (published in Sweden). The emission factor in the Welding study is 0.1622 pounds (lbs) of PM₁₀ per 1,000 inches (") cut for a 1" thick aluminum cut. The PM₁₀ emissions generated is assumed to be proportional to the thickness of the aluminum. Thus, for 1/8" thickness, the emission factor becomes 0.0203 lb/1,000" and for 0.1019" thickness is 0.0165 lb/1000".

The emission factors used for estimating the emissions from propane combustion in the heat treat oven were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.5, *Liquefied Petroleum Gas Combustion* (07/2008).

The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit Number 072003-017. Since the previous paint booth permitted in 072003-017 has been removed, the existing potential emissions do not include its potential emissions. Existing actual emissions were taken from the installation's 2008 Emission Inventory Questionnaire (EIQ). Potential emissions of the application represent the potential of the equipment associated with this project: dual paint booth (EP-10[Seg.3]), single paint booth (EP-10[Seg.4]) and plasma cutters (EP-11[seg.1 and seg.2]). Potential emissions of 2008-11-052 (Permit No. 022009-003) represent emission associated paint booth (EP-10[Seg.1]) and heat treat oven (EP-11). All potential emissions assume continuous operation (8760 hours per year).

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2008 EIQ)	Potential Emissions of Project ¹	Potential Emissions of 2008-11-052 ¹	Combined Potential Emissions ²
PM ₁₀	15.0	14.72	26.25 ³	6.45	0.88	7.33
SO _x	40.0	0.01	<<0.001	0.01	<<0.01	0.02
NO _x	40.0	5.60	1.35	1.87	0.93	2.80
VOC	40.0	<100	28.72	274.6	98.04	372.7
CO	100.0	1.00	0.23	1.08	0.54	1.62
HAPs	10.0/25.0	<10.0/25.0	N/D	142.0	42.6	184.5
Methanol	10.0	6.3	N/D	N/A	N/A	N/A
Methylene Chloride	10.0	8.7	N/D	N/A	N/A	N/A
Toluene	10.0	<10.0	N/D	47.1	18.8	65.9
Xylene	10.0	<10.0	N/D	51.9	18.8	70.7
Methyl Isobutyl Ketone	10.0	N/A	N/A	7.80	3.90	11.7
HDI	10.0	N/A	N/A	0.014	0.06	0.08
Ethyl Benzene	10.0	N/A	N/A	11.9	1.04	13.0
Phosphorous	10.0	N/A	N/A	0.56	N/A	0.56
Cobalt compounds	10.0	N/A	N/A	<<0.01	N/A	<<0.01
Chromium III compounds	10.0	N/A	N/A	<<0.01	N/A	<<0.01
Chromium VI compounds	10.0	N/A	N/A	0.051	N/A	0.051
MDI	10.0	N/A	N/A	16.5	N.A	16.5

N/A = Not Applicable; N/D = Not Determined

¹Changes were made to potential emissions of Permit No. 022009-003. The transfer efficiency and combined capture/control efficiency were adjusted to 65% and 96%, respectively. The emissions for the heat treat oven were originally based on natural gas; They are now based on propane.

²The combined potential emissions represent the emissions from the equipment associated with Permit No. 022009-003 (Project No. 2008-11-052) and this project (Project No. 2009-06-050).

³Actual PM₁₀ emissions for 2008 exceeded potential emissions due to problems associated with EP-01's filter. The problems have since been remedied.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs and HAPs for this project are above major source levels; however, potential emissions of VOCs for the installation are conditioned to less than major levels. All other pollutants are below de minimis levels.

APPLICABLE REQUIREMENTS

Tracker Marine - Lebanon Plant shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *Maximum Achievable Control Technology (MACT) Regulations*, 10 CSR 10-6.075, *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*, 40 CFR Part 63, Subpart VVVV
- *MACT Regulation*, 10 CSR 10-6.075, Subpart III, *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production*, 40 CFR Part 63, Subpart III
- *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*, 10 CSR 10-3.060

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Susan Heckenkamp
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated June 12, 2009, received June 17, 2009, designating Tracker Marine Group as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southwest Regional Office Site Survey, dated July 10, 2009.
- Material Safety Data Sheets.

Mr. Phil Kelsay
Air Compliance Manager
Tracker Marine - Lebanon Plant
1500 Maple Lane
Lebanon, MO 65536

RE: New Source Review Permit - Project Number: 2009-06-050

Dear Mr. Kelsay:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Susan Heckenkamp, at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:smh

Enclosures

c: Southwest Regional Office
PAMS File: 2009-06-050

Permit Number: