



Missouri Department of dnr.mo.gov

**NATURAL RESOURCES**

Michael L. Parson, Governor

Carol S. Comer, Director

May 21, 2020

Bill Hayes  
Facilities/SSE Manager  
Generation III Boats  
901 Cowan Drive  
Lebanon, MO 65536

RE: New Source Review Permit Amendment - Permit Number: 072006-001B,  
Project Number: 2020-04-039; Installation Number: 105-0038

Dear Bill Hayes:

This amendment of Construction Permit No. 072006-001A corrects the combustion unit equipment list included in Attachment A.

Following issuance of 072006-001A, the Air Pollution Control Program (APCP) received notice from the installation that eight (8) emission units were unaccounted for in the permit. The emission units are associated with curing and heat treat oven natural gas burners, and were excluded by mistake.

Construction Permit No. 072006-001A is revised by addition of the curing oven and heat treat ovens to Attachment A on the attached pages. Please use the new Attachment A, or equivalent methodology, for tracking your VOC emissions. Demonstration of compliance with the limitation(s) imposed by your permit, as amended, shall begin on the month of issuance at zero (0.0) tons of rolling consecutive 12-month VOC emissions.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty 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 administrative hearing commission, whose contact information



Bill Hayes  
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is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).

If you have any questions regarding this amendment, please do not hesitate to contact Liberty Sitzes, at the department's 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

A handwritten signature in blue ink that reads "Kendall B. Hale". The signature is written in a cursive style.

Kendall B. Hale  
Permits Section Chief

KBH:slj

Enclosures

c: Southwest Regional Office  
PAMS File: 2020-04-039

## Attachment A – Rolling Consecutive 12-Month VOC Emissions Compliance Worksheet

Generation III Boats

Laclede County, S12, T34, R16

Project Number: 2020-04-039

Installation ID Number: 105-0038

Permit Number: 072006-001B

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_.  
(month, year) (month, year)

### Step No. 1: Calculate Current Month's Non-Combustion-Related VOC Emissions

Material (conditioners, paints, primers, thinners, catalysts, hardeners, solvents, adhesives, etc.)	Monthly Throughput, $T_{Mat}$ (gallons)	Density, $D^1$ (pounds per gallon)	Total VOC Content <sup>2</sup> , $C_{VOC,tot}$ (weight percent)	VOC <sub>Mat,tot</sub> Emissions <sup>3</sup> (tons)
<b>Total Current Month's Non-Combustion-Related VOC Emissions</b>				

1 Obtained from the Safety Data Sheet (SDS) for each material. If the specific gravity of the material is listed instead, multiply the specific gravity by the density of water, 8.345 pounds per gallon, to obtain the material density in units of pounds per gallon.

2 Obtained from the Safety Data Sheet (SDS) for each material. If a range is listed for any individual or total VOC content, use the maximum value in the range. Only include VOCs not on the list of exempt VOCs included in 10 CSR 10-6.020(2)(V)13.A.

3 Calculate VOC<sub>Mat,tot</sub> for each material using the following equation:

$$VOC_{Mat,tot} = \frac{T_{Mat} \times D \times \left( \frac{C_{VOC,tot}}{100\%} \right)}{2000 \frac{lb}{ton}}$$

## Attachment A – Rolling Consecutive 12-Month VOC Emissions Compliance Worksheet (continued)

### Step No. 2: Calculate Current Month's Combustion-Related VOC Emissions

Equipment	Monthly Throughput, T <sub>NG</sub> [million Standard Cubic Feet (SCF)]	VOC <sub>Comb,tot</sub> Emissions <sup>4</sup> (tons)
Five (5) Natural Gas-Fired Paint Booth Oven Burners (1.7496 million Btus per hour each)		
Two (2) Natural Gas-Fired Dry-Off Oven Burners (1.944 million Btus per hour each)		
Six (6) Natural Gas-Fired Curing Oven Burners (0.205 million Btus per hour each)		
Two (2) Natural Gas-Fired Heat Treat Oven Burners (0.4 million Btus each)		
<b>Total Current Month's Combustion-Related VOC Emissions</b>		

### Step No. 3: Calculate Rolling Consecutive 12-Month VOC Emissions

Description	VOC Emissions (tons)
Total Current Month's Non-Combustion-Related VOC Emissions From Step No. 1	
Total Current Month's Combustion-Related VOC Emissions From Step No. 2	
Current Month's Start-up, Shutdown, and Malfunction Emissions	
Current Month's Total VOC Recovered and Shipped Off-Site	
Current Month's Total VOC Emissions <sup>5</sup>	
Previous Eleven Months' Total VOC Emissions	
<b>Rolling Consecutive 12-Month VOC Emissions<sup>6</sup></b>	

4 Calculate VOC<sub>Comb,tot</sub> for natural gas combustion units using the following equation (VOC emission factor obtained from Section 1.4 of EPA's *Compilation of Air Pollutant Emission Factors, Fifth Edition, Volume 1: Stationary Point and Area Sources* (AP-42):

$$VOC_{Comb,tot} = \left[ \frac{\left( T_{NG} \times 5.5 \frac{lb\ VOC}{million\ SCF} \right)}{2000 \frac{lb}{ton}} \right]$$

5 The Current Month's Total VOC Emissions equals the sum of the Total Current Month's Non-Combustion-Related VOC Emissions, the Total Current Month's Combustion-Related VOC Emissions, and the Current Month's Start-up, Shutdown, and Malfunction Emissions, minus the Current Month's Total VOC Recovered and Shipped Off-Site.

6 The Rolling Consecutive 12-Month VOC Emissions equals the sum of the Current Months Total VOC Emissions and the Previous Eleven Months' Total VOC Emissions. Rolling Consecutive 12-Month VOC Emissions of less than **235.0 tons** demonstrates compliance.