

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

JUL 11 2007

Mr. John Parkhurst
Plant Manager
Lowe Boats, Inc.
2900 Industrial Drive
Lebanon, MO 65536

Re: Lowe Boats, Inc., 105-0006
Permit Number: **OP2007-032**

Dear Mr. Parkhurst:

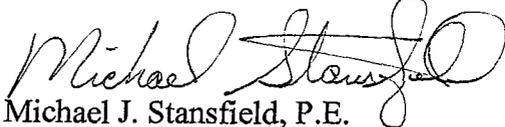
Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations, cited in this document, is necessary for continued compliance. It is very important you read and understand the requirements contained in your permit.

You may appeal this permit 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 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 AHC.

If you have any questions or need additional information regarding this permit, please contact Jill Wade at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or telephone (573) 751-4817. Thank you for your time and cooperation.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS: jwk

Enclosures

c: Ms. Tamara Freeman, U.S. EPA Region VII
Southwest Regional Office
PAMS File: 2003-06-023





PART 70 PERMIT TO OPERATE

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

Operating Permit Number: OP2007-032
Expiration Date: JUL 10 2012
Installation ID: 105-0006
Project Number: 2003-06-023

Installation Name and Address

Lowe Boats, Inc.
2900 Industrial Drive
Lebanon, MO 65536
Laclede County

Parent Company's Name and Address

Brunswick Corporation
1 N. Field Court
Lake Forest, IL 60045-4811

Installation Description:

Lowe Boats Inc. operates an aluminum boat manufacturing plant in Lebanon Missouri. The major operations at the installation are metal fabrication, woodworking, surface coating, adhesive application, solvent wipedown, drying ovens, and general assembly and storage of finished units.

JUL 11 2007

Effective Date

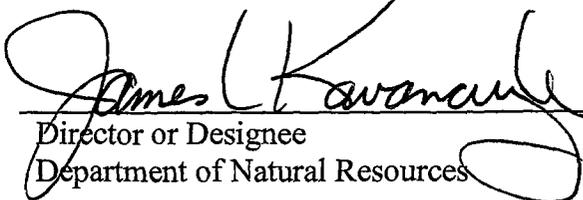

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING.....	4
INSTALLATION DESCRIPTION.....	4
EMISSION UNITS WITH LIMITATIONS.....	4
EMISSION UNITS WITHOUT LIMITATIONS.....	5
DOCUMENTS INCORPORATED BY REFERENCE.....	5
II. PLANT WIDE EMISSION LIMITATIONS.....	6
PERMIT CONDITION PW001.....	6
10 CSR 10-6.060, Construction Permits Required.....	6
Construction Permit 042005-008, Issued March 24, 2005.....	6
Construction Permit 1097-005, Issued September 22, 1997.....	6
PERMIT CONDITION PW002.....	7
10 CSR 10-6.075, Maximum Achievable Control Technology.....	7
40 CFR Part 63, Subpart A General Provisions and Subpart VVVV National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.....	7
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS.....	15
EU0010 – PLYWOOD CUTTING.....	15
PERMIT CONDITION EU0010-001.....	15
10 CSR 10-6.060, Construction Permits Required.....	15
Construction Permit 1097-005, Issued September 22, 1997.....	15
10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes.....	15
PERMIT CONDITION EU0010-002.....	16
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants.....	16
EU0020 THROUGH EU0060 – SURFACE COATING OPERATIONS.....	17
PERMIT CONDITION (EU0020 THROUGH EU0060)-001.....	18
10 CSR 10-6.060, Construction Permits Required.....	18
Construction Permit 042005-008, Issued March 24, 2005.....	18
Construction Permit 1097-005, Issued September 22, 1997.....	18
PERMIT CONDITION (EU0020 THROUGH EU0060)-002.....	18
10 CSR 10-6.060, Construction Permits Required.....	18
Construction Permit 1097-005, Issued September 22, 1997.....	18
Construction Permit 042005-008, Issued March 24, 2005.....	18
10 CSR 10-6.400, Restriction of Particulate Matter From Particulate Matter.....	18
PERMIT CONDITION (EU0020 THROUGH EU0060)-003.....	19
10 CSR 10-6.075, Maximum Achievable Control Technology.....	19
40 CFR Part 63, Subpart A General Provisions and Subpart VVVV National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.....	19
EU0070 AND EU0080 – SOLVENT OPERATIONS.....	19
PERMIT CONDITION (EU0070 AND EU0080)-001.....	19
10 CSR 10-6.060, Construction Permits Required.....	19
Construction Permit 042005-008, Issued March 24, 2005.....	19
Construction Permit 1097-005, Issued September 22, 1997.....	19
PERMIT CONDITION (EU0070)-002.....	20
10 CSR 10-6.075, Maximum Achievable Control Technology.....	20
40 CFR Part 63, Subpart A General Provisions and Subpart VVVV National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.....	20
EU0090 THROUGH EU0110 – CARPET GLUING.....	20
PERMIT CONDITION (EU0090 THROUGH EU0110)-001.....	20
10 CSR 10-6.060, Construction Permits Required.....	20
Construction Permit 042005-008, Issued March 24, 2005.....	20
Construction Permit 1097-005, Issued September 22, 1997.....	20
PERMIT CONDITION (EU0090 THROUGH EU0110)-002.....	20
10 CSR 10-6.060, Construction Permits Required.....	20
Construction Permit # 1097-005, Issued September 22, 1997.....	20
10 CSR 10-6.400, Restriction of Particulate Matter From Particulate Matter.....	20

PERMIT CONDITION (EU0090 THROUGH EU0110)-003.....	21
10 CSR 10-6.075, Maximum Achievable Control Technology.....	21
40 CFR Part 63, Subpart A General Provisions and Subpart VVVV National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.....	21
EU0120 – NON-CARPET/FABRIC ADHESIVE OPERATIONS.....	21
PERMIT CONDITION EU0120-001.....	22
10 CSR 10-6.060, Construction Permits Required.....	22
Construction Permit 042005-008, Issued March 24, 2005.....	22
Construction Permit 1097-005, Issued September 22, 1997.....	22
EU0130 THROUGH EU0160 – DRYING OVENS.....	22
PERMIT CONDITION (EU0130 THROUGH EU0160)-001.....	22
10 CSR 10-6.060, Construction Permits Required.....	22
Construction Permit 042005-008, Issued March 24, 2005.....	22
Construction Permit 1097-005, Issued September 22, 1997.....	22
PERMIT CONDITION (EU0130 THROUGH EU0160)-002.....	22
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds.....	22
IV. CORE PERMIT REQUIREMENTS.....	24
V. GENERAL PERMIT REQUIREMENTS.....	29
VI. ATTACHMENTS.....	34
ATTACHMENT A.....	35
ATTACHMENT B.....	36
ATTACHMENT C.....	37
ATTACHMENT D-1.....	38
ATTACHMENT D-2.....	39
ATTACHMENT E.....	40
ATTACHMENT F.....	41

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Lowe Boats Inc. operates an aluminum boat manufacturing plant in Lebanon Missouri. The major operations at the installation are metal fabrication, woodworking, surface coating, adhesive application, solvent wipedown, drying ovens, and general assembly and storage of finished units.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2005	0.37	9.70	1.39	82.88	0.35	0.0	0.40
2004	0.36	10.09	1.45	101.23	0.36	0.0	0.56
2003	0.38	11.90	1.71	124.27	0.43	0.0	0.65
2002	0.33	10.17	1.46	103.98	0.36	0.0	0.56
2001	0.22	5.50	0.79	57.08	0.20	0.0	0.33

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit	EIQ EP#
EU0010	Plywood Cutting	EP-5
EU0020	Paint Room #1 – Primer Booth	EP-7
EU0030	Paint Room #1 – Top Coat Booth	EP-8
EU0040	Paint Room #2 – Spray Booth	EP-10
EU0050	Paint Room #3 – Paint Booth	EP-21
EU0060	Paint Room #2 – Multipurpose Booth	EP-23
EU0070	Boat Assembly/Solvent Usage	EP-15
EU0080	Other Cleaning Solutions	EP-18
EU0090	Carpet Gluing 12	EP-12
EU0100	Carpet Gluing 12A	EP-12A
EU0110	Carpet Gluing 12B	EP-12B
EU0120	Non-Carpet/Fabric Adhesive Operations	EP-17
EU0130	Paint Room #1 – Drying Oven	EP-16
EU0140	Paint Room #3 – Paint Booth Drying Oven	EP-16
EU0150	Paint Room #2 – Drying Oven	EP-16
EU0160	Paint Room #3 – Wash Booth Drying Oven	EP-16

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.

Description of Emission Source

Welding (fugitive) (EP-19)
Plasma cutters (EP-20)
Three wash booths
Four spray foam dispensers
Space heaters (< 10 MMBtu/hr each, LPG fired)

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit 1097-005, amended 4/30/2001
- 2) Construction Permit 092002-011
- 3) Construction Permit 022004-002
- 4) Construction Permit 042005-008

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 10-6.060, Construction Permits Required
Construction Permit 042005-008, Issued March 24, 2005
Construction Permit 1097-005, Issued September 22, 1997

Superseding Condition:

The conditions of Construction Permit 042005-008 supersede all special conditions found in previously issued construction permits (Permit Numbers 092002-011 and 022004-002) from the Air Pollution Control Program. [Construction Permit 042005-008, Special Condition 1]

Emission Limitation/Operational Limitation:

- 1) Lowe Boats shall not emit Volatile Organic Compounds (VOC) from the entire installation in excess of 249 tons in any consecutive 12-month period. [Construction Permit 042005-008, Special Condition 2(A)]
- 2) Lowe Boats Incorporated shall keep all VOC and hazardous air pollutants (HAP) emitting paints, solvents and cleaners in sealed containers whenever the materials are not in use. Lowe Boats shall provide and maintain suitable, easily read, permanent markings on all VOC and HAP emission paints, solvents and cleaner containers used in this installation. [Construction Permit 042005-008, Special Condition 3]

Monitoring/Recordkeeping:

Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with emission limitation. Lowe Boats 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 this installation. [Construction Permit 042005-008, Special Condition 2(B)]

Reporting:

- 1) If a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.090, *Restriction of Emission of Odors*, the Director may require the source to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. The source shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of the permit. [Construction Permit 1097-005, Special Condition 1]
- 2) Lowe Boats shall report to the Air Pollution Control Program's (APCP) Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of each month during which the records from Special Condition Number 2(B) indicate that the source exceeds the limitation of Special Condition Number 2(A). [Construction Permit 042005-008, Special Condition 2(C)]

PERMIT CONDITION PW002

10 CSR 10-6.075, Maximum Achievable Control Technology
40 CFR Part 63, Subpart A General Provisions and Subpart VVVV National Emission Standards for
Hazardous Air Pollutants for Boat Manufacturing

Emission Limitation:

- 1) *Carpet and Fabric Adhesives*: The permittee must use carpet and fabric adhesives that contain no more than five (5) percent organic HAP by weight. [§63.5740(a)]
- 2) *Aluminum Wipedown Solvent Operations and Aluminum Surface Coating Operations*: For aluminum wipedown solvent operations and aluminum surface coating operations, you must comply with either the separate emission limits in §63.5743(a)(1) and (2), or the combined emission limit in §63.5743(a)(3). Compliance with these limitations is based on a 12-month rolling average that is calculated at the end of every month. [§63.5743(a)]
 - a) You must limit emissions from aluminum wipedown solvents to no more than 0.33 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. No limit applies when cleaning surfaces are receiving decals or adhesive graphics. [§63.5743(a)(1)]
 - b) You must limit emissions from aluminum recreational boat surface coatings (including thinners, activators, primers, topcoats, and clear coats) to no more than 1.22 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. [§63.5743(a)(2)]
 - c) You must limit emissions from the combined aluminum surface coatings and aluminum wipedown solvents to no more than 1.55 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. [§63.5743(a)(3)]
- 3) You must comply with the work practice standard in §63.5743(b)(1), (2), (3), or (4) when cleaning aluminum coating spray guns with solvents containing more than five percent organic HAP by weight. [§63.5743(b)]
 - a) Clean spray guns in an enclosed device. Keep the device closed except when you place the spray guns in or remove them from the device. [§63.5743(b)(1)]
 - b) Disassemble the spray gun and manually clean the components in a vat. Keep the vat closed when it is not in use. [§63.5743(b)(2)]
 - c) Clean spray guns by placing solvent in the pressure pot and forcing the solvent through the gun. Do not use atomizing air during this procedure. Direct the used cleaning solvent from the spray gun into a container that is kept closed when not in use. [§63.5743(b)(3)]
 - d) An alternative gun cleaning process or technology approved by the Administrator according to the procedures in §63.6(g). [§63.5743(b)(4)]

Monitoring:

- 1) *Carpet and Fabric Adhesives*: To demonstrate compliance with the carpet and adhesive emission limitation in §63.5740(a), you must determine the organic HAP content of the carpet and fabric adhesives using the methods in §63.5758. [§63.5740(b)]
- 2) *Aluminum Wipedown Solvent Operations and Aluminum Surface Coating Operations*: To demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum coatings specified in §63.5743(a), you must meet the requirements of §63.5746(a) through (f) listed below. [§63.5746]
 - a) Determine and record the organic HAP content (kilograms of organic HAP per kilogram of material, or weight fraction) of each aluminum wipedown solvent and aluminum coating (including primers, topcoats, clear coats, thinners, and activators). Use the methods in §63.5758 to determine organic HAP content. [§63.5746(a)]

- b) Use the methods in §63.5758(b) to determine the solids content (liters of solids per liter of coating, or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats. Keep records of the solids content. [§63.5746(b)]
 - c) Use the methods in §63.5758(c) to determine the density of each aluminum surface coating and wipedown solvent. [§63.5746(c)]
 - d) Compliance is based on a 12-month rolling average calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in §63.5695. [§63.5746(d)]
 - e) At the end of the twelfth month after the compliance date and at the end of every subsequent month, use the procedures in §63.5749 to calculate the organic HAP from aluminum wipedown solvents per liter of coating solids, and use the procedures in §63.5752 to calculate the kilograms of organic HAP from aluminum coatings per liter of coating solids. [§63.5746(e)]
 - f) Keep records of the calculations used to determine compliance. [§63.5746(f)]
- 3) *Approval of alternative means of demonstrating compliance.* You may apply to the Administrator for permission to use an alternative means (such as an add-on control system) of limiting emissions from aluminum wipedown solvent and coating operations and demonstrating compliance with the emission limits in §63.5743(a). [§63.5746(g)]
- a) The application must include the information listed in §63.5746(g)(1)(i) through (iii). [§63.5746(g)(1)]
 - i) An engineering evaluation that compares the emissions using the alternative means to the emissions that would result from using the strategy specified in §63.5746(a) through (e). The engineering evaluation may include the results from an emission test that accurately measures the capture efficiency and control device efficiency achieved by the control system and the composition of the associated coatings so that the emissions comparison can be made. [§63.5746(g)(1)(i)]
 - ii) A proposed monitoring protocol that includes operating parameter values to be monitored for compliance and an explanation of how the operating parameter values will be established through a performance test. [§63.5746(g)(1)(ii)]
 - iii) Details of appropriate recordkeeping and reporting procedures. [§63.5746(g)(1)(iii)]
 - b) The Administrator will approve the alternative means of limiting emissions if the Administrator determines that HAP emissions will be no greater than if the source uses the procedures described in §63.5746(a) through (e) to demonstrate compliance. [§63.5746(g)(2)]
 - c) The Administrator's approval may specify operation, maintenance, and monitoring requirements to ensure that emissions from the regulated operations are no greater than those that would otherwise result from regulated operations in compliance with subpart VVVV. [§63.5746(g)(3)]

Compliance Demonstration/Calculations:

- 1) *Calculating Organic HAP Content of Aluminum Wipedown Solvents:* Use equation 1 to calculate the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months. [§63.5749(a)]

$$HAP_{WD} = \frac{\sum_{j=1}^n (Vol_j)(D_j)(W_j)}{\sum_{i=1}^m (Vol_i)(Solids_i)} \quad \text{(Equation 1)}$$

Where:

HAP_{WD} = weighted-average organic HAP content of aluminum wipedown solvents, kilograms of HAP per liter of total coating solids from aluminum primers, top coats, and clear coats.

n = number of different wipedown solvents used in the past 12 months.

Vol_j = volume of aluminum wipedown solvent j used in the past 12 months, liters.

D_j = density of aluminum wipedown solvent j , kilograms per liter.

W_j = mass fraction of organic HAP in aluminum wipedown solvent j .

m = number of different aluminum surface coatings (primers, top coats, and clear coats) used in the past 12 months.

Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

$Solids_i$ = solids content aluminum primer, top coat, or clear coat i , liter solids per liter of coating.

- 2) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 0.33 kilograms of organic HAP per liter of total coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(1). [§63.5749(b)]
- 3) *Calculating Organic HAP Content for All Aluminum Surface Coatings:* Use equation 2 to calculate the weighted-average HAP content for all aluminum surface coatings used in the past 12 months. [§63.5752(a)]

$$HAP_{SC} = \frac{\sum_{i=1}^m (Vol_i)(D_i)(W_i) + \sum_{k=1}^D (Vol_k)(D_k)(W_k)}{\sum_{i=1}^m (Vol_i)(Solids_i)} \quad \text{(Equation 2)}$$

Where:

HAP_{SC} = weighted-average organic HAP content for all aluminum coating materials, kilograms of organic HAP per liter of coating solids.

m = number of different aluminum primers, top coats, and clear coats used in the past 12 months.

Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

D_i = density of coating i , kilograms per liter.

W_i = mass fraction of organic HAP in coating i , kilograms of organic HAP per kilogram of coating.

p = number of different thinners, activators, and other coating additives used in the past 12 months.

Vol_k = total volume of thinner, activator, or additive k used in the past 12 months, liters.

D_k = density of thinner, activator, or additive k , kilograms per liter.

W_k = mass fraction of organic HAP in thinner, activator, or additive k , kilograms of organic HAP per kilogram of thinner or activator.

$Solids_i$ = solids content of aluminum primer, top coat, or clear coat i , liter solids per liter of coating.

- 4) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 1.22 kilograms of organic HAP per liter of coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(2). [§63.5752(b)]
- 5) *Calculating Combined Organic HAP Content of Aluminum Wipedown Solvents and Aluminum Recreational Boat Surface Coatings:* Use equation 3 to calculate the combined weighted-average

organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings. [§63.5753(a)]

$$HAP_{Combined} = HAP_{WD} + HAP_{SC} \quad (\text{Equation 3})$$

Where:

HAP_{WD} = the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months, calculated using equation 1 of §63.5749.

HAP_{SC} = the weighted average organic HAP content of aluminum recreational boat surface coatings used in the past 12 months, calculated using equation 1 of §63.5752.

- 6) Compliance is based on a 12-month rolling average. If the combined organic HAP content does not exceed 1.55 kilograms of organic HAP per liter of total coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(3). [§63.5753(b)]
- 7) *Aluminum Coating Spray Gun Cleaning Work Practice Standards:* You must demonstrate compliance with the aluminum coating spray gun cleaning work practice standards by meeting the requirements of §63.5755(a) or (b). [§63.5755]
 - a) Demonstrate that solvents used to clean the aluminum coating spray guns contain no more than five percent organic HAP by weight by determining organic HAP content with the methods in §63.5758. Keep records of the organic HAP content determination. [§63.5755(a)]
 - b) For solvents containing more than 5 percent organic HAP by weight, comply with the requirements in §63.5755(b)(1) or (b)(2), and §63.5755(b)(3). [§63.5755(b)]
 - i) If you are using an enclosed spray gun cleaner, visually inspect it at least once per month to ensure that covers are in place and the covers have no visible gaps when the cleaner is not in use, and that there are no leaks from hoses or fittings. [§63.5755(b)(1)]
 - ii) If you are manually cleaning the gun or spraying solvent into a container that can be closed, visually inspect all solvent containers at least once per month to ensure that the containers have covers and the covers fit with no visible gaps. [§63.5755(b)(2)]
 - iii) Keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers. [§63.5755(b)(3)]
- 8) *Determining Organic HAP Content:* To determine the organic HAP content for each material used, one of the options in §63.5758(a)(1) through (6) can be used. [§63.5758(a)]
 - a) *Method 311 (appendix A to 40 CFR part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in 63.5758(a)(1)(i) and (ii), listed below, when determining organic HAP content by Method 311. [§63.5758(a)(1)]
 - i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at one percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the facility does not need to include it in the organic HAP total. Express the mass fraction of each organic HAP measured, as a value truncated to four places after the decimal point (for example, 0.1234). [§63.5758(a)(1)(i)]
 - ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123). [§63.5758(a)(1)(ii)]
 - b) *Method 24 (appendix A to 40 CFR part 60).* You may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP. [§63.5758(a)(2)]

- c) *ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins)*. You may use ASTM D1259-85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP. [§63.5758(a)(3)]
- d) *Alternative method*. You may use an alternative test method for determining mass fraction of organic HAP if the facility obtains prior approval by the Administrator. You must follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.5758(a)(4)]
- e) *Information from the supplier or manufacturer of the material*. You may rely on information other than that generated by the test methods specified in §63.5758(a)(1) through (4), such as manufacturer's formulation data, according to §63.5758(a)(5)(i) through (iii) listed below. [§63.5758(a)(5)]
- i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at one percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the facility does not have to include it in the organic HAP total. [§63.5758(a)(5)(i)]
- ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in §63.5758(a)(1) through (4) exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance. [§63.5758(a)(5)(ii)]
- iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in §63.5758(a)(1) through (4) is less than two percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by two percentage points or more, then you must use the measured organic HAP content to determine compliance. [§63.5758(a)(5)(iii)]
- f) *Solvent blends*. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in Table 5 or 6 to subpart VVVV. You may use Table 6 to subpart VVVV only if the solvent blends in the materials used, do not match any of the solvent blends in Table 5 to subpart VVVV and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to subpart VVVV, then the test results must be used for determining compliance. [§63.5758(a)(6)]
- 9) *Determining Volume Fraction of Coating Solids in Aluminum Recreational Boat Surface Coatings*: To determine the volume fraction of coating solids (liters of coating solids per liter of coating) for each aluminum recreational boat surface coating, you must use one of the methods specified in §63.5758(b)(1) through (3). If the results obtained with §63.5758(b)(2) or (3) do not agree with those obtained according to §63.5758(b)(1), you must use the results obtained with §63.5758(b)(1) to determine compliance. [§63.5758(b)]
- a) *ASTM Method D2697-86(1998) or D6093-97*. You may use ASTM Method D2697-86(1998) or D6093-97 (available for purchase from ASTM) to determine the volume fraction of coating

solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. [§63.5758(b)(1)]

- b) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. [§63.5758(b)(2)]
- c) *Calculation of volume fraction of coating solids.* You may determine it using equation 4: [§63.5758(b)(3)]

$$\text{Solids} = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad (\text{Equation 4})$$

Where:

Solids = volume fraction of coating solids, liters coating solids per liter coating.

$m_{\text{volatiles}}$ = Total volatile matter content of the coating, including organic HAP, volatile organic compounds, water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

D_{avg} = average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-90 (available for purchase from ASTM), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-90 test results and other information sources, the test results will take precedence.

- 10) *Determining Density of Aluminum Recreational Boat Wipedown Solvents:* Determine the density of all aluminum recreational boat wipedown solvents, surface coatings, thinners, and other additives from test results using ASTM Method D1475-90, information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-90 test results and other information sources, you must use the test results to demonstrate compliance. [§63.5758(c)]

Recordkeeping:

- 1) You must record the organic HAP content of the carpet and fabric adhesives using the methods in §63.5758. [§63.5740(b)]
- 2) You must keep records of the solids contents (liters of solid per liter of coating, or volume fraction) of each aluminum surface coating, including primers, top coats, and clear coats. [§63.5746(b)]
- 3) You must keep records of the calculations used to determine compliance. [§63.5746(f)]
- 4) You must keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers. [§63.5755(b)(3)]
- 5) You must keep a copy of each notification and report that you submitted to comply with subpart VVVV. [§63.5767(a)]
- 6) You must keep all documentation supporting any notification or report that you submitted. [§63.5767(b)]
- 7) You must keep records of the total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in §63.5752. [§63.5767(c)(2) and §63.5746(a)]
- 8) You must keep records of the total amount of each aluminum wipedown solvent used per month and the weighted-average organic HAP content as determined in §63.5749. [§63.5767(c)(3)]
- 9) Your records must be readily available and in a form so they can be easily inspected and reviewed. [§63.5770(a)]

- 10) You must keep each record for five years following the date that each record is generated. [§63.5770(b)]
- 11) You must keep each record on site for at least two years after the date that each record is generated. The records can be kept offsite for the remaining three years. [§63.5770(c)]
- 12) You can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche. [§63.5770(d)]

Reporting:

- 1) You must submit all of the notifications that apply to you in Table 7 of subpart VVVV. The notifications are described more fully in 40 CFR part 63, subpart A, General Provisions, referenced in Table 8 to subpart VVVV. [§63.5761(a)]
- 2) You must submit an initial notification containing the information specified in §63.9(b)(2). [Table 7 to Subpart VVVV]
- 3) If you qualify for a compliance extension as specified in §63.9(c), then you must submit a request for a compliance extension as specified in §63.9(c). [Table 7 to Subpart VVVV]
- 4) You must submit a notification of compliance status as specified in §63.9(h). [Table 7 to Subpart VVVV]
- 5) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change. [§63.5761(b)]
- 6) You must submit the applicable reports specified in §63.5764(b) through (e). To the extent possible, you must organize each report according to the operations covered by subpart VVVV and the compliance procedure followed for that operation. [§63.5764(a)]
- 7) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the dates in §63.5764(b)(1) through (5). [§63.5764(b)]
 - a) The first compliance report must cover the period beginning 12 months after August 23, 2004 and ending on December 31. [§63.5764(b)(1)]
 - b) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in §63.5764(b)(1). [§63.5764(b)(2)]
 - c) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. [§63.5764(b)(3)]
 - d) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period. [§63.5764(b)(4)]
 - e) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in §63.5764(b)(1) through (4). [§63.5764(b)(5)]
- 8) The compliance report must include the information specified in §63.5764(c)(1) through (7). [§63.5764(c)]
 - a) Company name and address. [§63.5764(c)(1)]
 - b) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report. [§63.5764(c)(2)]
 - c) The date of the report and the beginning and ending dates of the reporting period. [§63.5764(c)(3)]
 - d) A description of any changes in the manufacturing process since the last compliance report. [§63.5764(c)(4)]
 - e) A statement or table showing, for each regulated operation, the applicable organic HAP content limit or the application equipment requirement with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average

MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period. [§63.5764(c)(5)]

- f) If you were in compliance with the emission limits and work practice standards during the reporting period, the permittee must include a statement to that effect. [§63.5764(c)(6)]
- g) If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed in §63.5764(c)(7)(i) through (iv) in the semiannual compliance report. [§63.5764(c)(7)]
 - i) A description of the operation involved in the deviation. [§63.5764(c)(7)(i)]
 - ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation. [§63.5764(c)(7)(ii)]
 - iii) A description of any corrective action you took to minimize the deviation and actions that have been taken to prevent it from happening again. [§63.5764(c)(7)(iii)]
 - iv) A statement of whether or not you were in compliance for the 12-month averaging period that ended at the end of the reporting period. [§63.5764(c)(7)(iv)]

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 – PLYWOOD CUTTING			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0010	Plywood Cutting: wood cutting, grinding, and drilling using various hand-held and stationary machinery; MHDR 0.55 ton/hr; equipped with dust collection and capture baghouse system; installed 1986	Powermatic, Dewalt, Black & Decker	EP-5

<p align="center">PERMIT CONDITION EU0010-001 10 CSR 10-6.060, Construction Permits Required Construction Permit 1097-005, Issued September 22, 1997 10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes</p>
--

Emission Limitation:

- 1) Particulate matter shall not be emitted from EU0010 in excess of 2.75 lb/hr.
- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grain per standard cubic feet of exhaust gases.

Monitoring:

- 1) The fabric filter (CD-01) on the plywood cutting process (EU0010) shall be in use at all times when the associated process (EU0010) is in operation, and shall be operated and maintained in accordance with the manufacturer's specifications. The fabric filter shall be equipped with a gauge or meter which indicates the pressure drop across it. This gauge or meter shall be located such that it may be easily observed by the Department of Natural Resources' employees. [Construction Permit #1097-005, Special Condition 3]
- 2) The permittee shall check and document the baghouse pressure drops daily, whenever the emission unit is in operation. If either pressure drop falls out of the normal operating range, corrective action shall be taken as soon as practicable but within eight hours to return the pressure drop to normal.
- 3) Baghouse maintenance monitoring:
 - a) Check and document the cleaning sequence of the dust collector every six months.
 - b) Inspect bags for leaks and wear every six months.
 - c) Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods every six months.
- 4) Maintain a written record of all observations, deficiencies and any action resulting from inspections.
- 5) All instruments and control equipment shall be calibrated, maintained and operated according to the manufacturer's instructions.

Recordkeeping:

- 1) The permittee shall document all pressure drop readings. (see Attachment B)
- 2) All inspections, corrective actions, and instrument calibration shall be recorded. (see Attachment C)
- 3) Attachments B and C contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, must be used to certify compliance with this requirement.

- 4) These records shall be made available to the Missouri Department of Natural Resources' personnel upon request.
- 5) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the emission limitation and/or pressure drop range listed above.
- 2) Reports of any deviations from monitoring other than the pressure drop range, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION EU0010-002

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on this emission unit (EU0010) using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made semi-annually. If a violation is noted, monitoring reverts to weekly. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. If the source has already performed the weekly and biweekly monitoring and is doing monitoring in compliance with a previous permit, the weekly and biweekly monitoring do not need to be repeated.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachments D1 or D2), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.

- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment C)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment E)
- 4) Attachments C, D1, D2 and E contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available to the Missouri Department of Natural Resources' personnel upon request.
- 6) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0020 THROUGH EU0060 – SURFACE COATING OPERATIONS			
Emission Unit	Description	Manufacturer/ Model #	2004 EIO Reference #
EU0020	Paint Room #1-Primer Booth: various primers, paints and solvents are applied using pneumatic hand held conventional and HVLP, airless, and air-assist spray equipment in semi-enclosed and ventilated booth; MHDR 18.0 gal/hr; equipped with mat filter; installed 1972	Custom built spray booth	EP-7
EU0030	Paint Room #1-Top Coat Booth: various primers, paints and solvents are applied using pneumatic hand held conventional and HVLP, airless, and air-assist spray equipment in semi-enclosed and ventilated booth; MHDR 18.0 gal/hr; equipped with mat filter; installed 1972	Custom built spray booth	EP-8
EU0040	Paint Room #2-Spray Booth: various primers, paints and solvents are applied using pneumatic hand held conventional and HVLP, airless, and air-assist spray equipment in enclosed and ventilated booth; MHDR 18.0 gal/hr; equipped with mat filter; installed 1989	Custom built spray booth	EP-10
EU0050	Paint Room #3-Paint Booth: various paints and coating are applied using pneumatic hand held conventional and HVLP, airless, and air-assist spray equipment in enclosed and ventilated booth; MHDR 18.8 gal/hr; equipped with mat filter; installed 2003	Manufactured Spray booth	EP21
EU0060	Paint Room #2-Multipurpose Booth: both paints and adhesives are applied; MHDR for paints 18.8 gal/hr; MHDR for adhesives 28.2 gal/hr equipped with panel filter; installed 2005	Custom built spray booth	EP23

PERMIT CONDITION (EU0020 THROUGH EU0060)-001

10 CSR 10-6.060, Construction Permits Required
Construction Permit 042005-008, Issued March 24, 2005
Construction Permit 1097-005, Issued September 22, 1997

All surface coating operations (EU0020 through EU0060) are subject to the emission limitation in Permit Condition PW001, and their VOC emissions must be reported on Attachment A, VOC Emissions Tracking Record or an equivalent form created by the permittee.

PERMIT CONDITION (EU0020 THROUGH EU0060)-002

10 CSR 10-6.060, Construction Permits Required
Construction Permit 1097-005, Issued September 22, 1997¹
Construction Permit 042005-008, Issued March 24, 2005²
10 CSR 10-6.400, Restriction of Particulate Matter From Particulate Matter

Emission Limitation:

- 1) The permittee shall not emit particulate matter from each emission unit EU0020 through EU0060 in excess of the emission rates calculated using the following equation:
For process weight rates of 60,000 lb/hr or less:
$$E = 4.10(P)^{0.67}$$

Where:
E = rate of emission in lb/hr
P = process weight rate in ton/hr
- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grain per standard cubic feet of exhaust gases.

Monitoring:

- 1) The paint overspray collection system (CD-4) shall be in use at all times when the associated process (EU0040) is in operation, and shall be operated and maintained in accordance with the manufacturer's specifications. The paint particulate mat or filter shall be replaced as deemed necessary by visual inspection. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance.) [Construction Permit #1097-005, Special Condition 3]
- 2) Booths shall not be operated without a mat/panel filter in place.
- 3) A panel filter must be in use at all times when the Multi-Purpose Booth (EU0060) is in operation and shall be operated and maintained in accordance with the manufacturer's specifications. [Construction Permit #042005-005, Special Condition 4]
- 4) The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 5) The filters shall be inspected each shift before spraying begins and after installation of a new filter.
- 6) The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

¹ Construction Permit 1097-005 applies to New Paint Shop Spray Booth (EU0040)

² Construction Permit 042005-008 applies to the Multi-Purpose Booth (EU0060)

Recordkeeping:

- 1) The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule. (See Attachment F)
- 2) The permittee shall maintain records of inspections of filters when they occur. (See Attachment C)
- 3) Attachments C and F contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, shall be used to certify compliance with this requirement.
- 4) These records shall be made available to the Missouri Department of Natural Resources' personnel upon request.
- 5) All records shall be maintained for five years.

Reporting:

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION (EU0020 THROUGH EU0060)-003
10 CSR 10-6.075, Maximum Achievable Control Technology
40 CFR Part 63, Subpart A General Provisions and Subpart VVVV National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

All surface coating operation (EU0020 through EU0060), including primers, top coats, clear coats, thinners, and activators, and all carpet and fabric adhesive operations in Multi-Purpose Booth (EU0060) are subject to the emission limitations in Permit Condition PW002. All aluminum coating spray gun cleaning is subject to the work practice standards in Permit Condition PW002.

EU0070 AND EU0080 – SOLVENT OPERATIONS			
Emission Unit	Description	Manufacturer/ Model #	2004 EIQ Reference #
EU0070	Boat Assembly/Solvent Usage: hand applied solvent to clean and prepare aluminum surfaces of a boat for further finishing; fugitive source	NA	EP-15, EP-18
EU0080	Other Cleaning Solutions: miscellaneous solvents usage; fugitive source	NA	EP-15, EP-18

PERMIT CONDITION (EU0070 AND EU0080)-001
10 CSR 10-6.060, Construction Permits Required
Construction Permit 042005-008, Issued March 24, 2005
Construction Permit 1097-005, Issued September 22, 1997

Solvent operations (EU0070 and EU0080) are subject to the emission limitation in Permit Condition PW001, and their VOC emissions must be reported on Attachment A, VOC Emissions Tracking Record or an equivalent form created by the permittee.

PERMIT CONDITION (EU0070)-002
 10 CSR 10-6.075, Maximum Achievable Control Technology
 40 CFR Part 63, Subpart A General Provisions and Subpart VVVV National Emission Standards for
 Hazardous Air Pollutants for Boat Manufacturing

Assembly/Solvent Usage (EU0070) includes aluminum wipedown solvents, i.e. solvents used to remove oil, grease, welding smoke, or other contaminants from the aluminum surfaces of a boat before priming or painting. These solvents are subject to emission limitations in Permit Condition PW002.

EU0090 THROUGH EU0110 – CARPET GLUING			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0090	Carpet Gluing 12: various glues and adhesives applied using pneumatic hand-held spray equipment in semi-enclosed and ventilated booth; MHDR 28.2 gal/hr; equipped with mat filter	Custom build booth with DeVilbis, Graco, or equivalent spray equipment	EP-12
EU0100	Carpet Gluing 12A: various glues and adhesives applied using pneumatic hand-held spray equipment in semi-enclosed and ventilated booth; MHDR 28.2 gal/hr; equipped with mat filter	Custom build booth with DeVilbis, Graco, or equivalent spray equipment	EP-12
EU0110	Carpet Gluing 12B: various glues and adhesives applied using two pneumatic hand-held spray equipment with an overhead hood; MHDR 28.2 gal/hr; equipped with mat filter	Custom build booth with DeVilbis, Graco, or equivalent spray equipment	EP-12

PERMIT CONDITION (EU0090 THROUGH EU0110)-001
 10 CSR 10-6.060, Construction Permits Required
 Construction Permit 042005-008, Issued March 24, 2005
 Construction Permit 1097-005, Issued September 22, 1997

All carpet gluing operations (EU0090 through EU0110) are subject to the emission limitation in Permit Condition PW001, and their VOC emissions must be reported on Attachment A, VOC Emissions Tracking Record or an equivalent form created by the permittee.

PERMIT CONDITION (EU0090 THROUGH EU0110)-002
 10 CSR 10-6.060, Construction Permits Required
 Construction Permit # 1097-005, Issued September 22, 1997
 10 CSR 10-6.400, Restriction of Particulate Matter From Particulate Matter

Emission Limitation:

- 1) The permittee shall not emit particulate matter from each carpet gluing operating (EU0090 through EU0110) in excess of the emission rates calculated using the following equation:
 For process weight rates of 60,000 lb/hr or less:

$$E = 4.10(P)^{0.67}$$
 Where:
 E = rate of emission in lb/hr
 P = process weight rate in ton/hr
- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grain per standard cubic feet of exhaust gases.

Monitoring:

- 1) The glue overspray collection systems shall be in use at all times when the associated processes (EU0090 through EU0110) are in operation, and shall be operated and maintained in accordance with the manufacturer's specifications. The particulate mats or filters shall be replaced as deemed necessary by visual inspection. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance.) [Construction Permit #1097-005, Special Condition 3]
- 2) The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 3) The filters shall be inspected each shift before spraying begins and after installation of a new filter.
- 4) The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Recordkeeping:

- 1) The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule. (See Attachment F)
- 2) The permittee shall maintain records of inspections of filters when they occur. (See Attachment C)
- 3) Attachments C and F contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, shall be used to certify compliance with this requirement.
- 4) These records shall be made available to the Missouri Department of Natural Resources' personnel upon request.
- 5) All records shall be maintained for five years.

Reporting:

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION (EU0090 THROUGH EU0110)-003

10 CSR 10-6.075, Maximum Achievable Control Technology
40 CFR Part 63, Subpart A General Provisions and Subpart VVVV National Emission Standards for
Hazardous Air Pollutants for Boat Manufacturing

All carpet gluing operations (EU0090 through EU0110) are subject to emission limitations in Permit Condition PW002.

EU0120 – NON-CARPET/FABRIC ADHESIVE OPERATIONS			
Emission Unit	Description	Manufacturer/ Model #	2004 EIQ Reference #
EU0120	Non-Carpet/Fabric Adhesive Operations: miscellaneous adhesive application using hand-held spray equipment in open areas of plant	NA	EP-17

PERMIT CONDITION EU0120-001

10 CSR 10-6.060, Construction Permits Required
Construction Permit 042005-008, Issued March 24, 2005
Construction Permit 1097-005, Issued September 22, 1997

All non-carpet/fabric adhesive operations (EU0120) are subject to the emission limitation in Permit Condition PW001, and their associated VOC emissions must be reported on Attachment A, VOC Emissions Tracking Record or an equivalent form created by the permittee.

EU0130 THROUGH EU0160 – DRYING OVENS

Emission Unit	Description	Manufacturer/ Model #	2004 EIQ Reference #
EU0130	Paint Room #1-Drying Oven: LPG-fired combustion unit; MHDR 5.6 MMBtu/gal	NA	EP-16
EU0140	Paint Room #3-Paint Booth Drying Oven: LPG-fired combustion unit; MHDR 8.0 MMBtu/gal	NA	EP-16
EU0150	Paint Room #2-Drying Oven: LPG-fired combustion unit; MHDR 8.0 MMBtu/gal	NA	EP-16
EU0160	Paint Room #3-Wash Booth Drying Oven: LPG-fired combustion unit; MHDR 1.6 MMBtu/gal	NA	EP-16

PERMIT CONDITION (EU0130 THROUGH EU0160)-001

10 CSR 10-6.060, Construction Permits Required
Construction Permit 042005-008, Issued March 24, 2005
Construction Permit 1097-005, Issued September 22, 1997

All drying ovens (EU0130 through EU0160) are subject to the emission limitation in Permit Condition PW001, and their VOC emissions must be reported on Attachment A, VOC Emissions Tracking Record or an equivalent form created by the permittee.

PERMIT CONDITION (EU0130 THROUGH EU0160)-002

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Emission Limitation:

- 1) Emissions from any source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
- 2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation/Equipment Specifications:

These emission units (EU0130 through EU0160) shall be limited to burning pipeline grade natural gas or liquefied petroleum gas or any combination of these fuels.

Monitoring/Recordkeeping:

The permittee shall maintain documentation supporting that the fuels used in these emission units are pipeline grade natural gas or liquefied petroleum gas or a combination of these fuels.

Reporting:

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

IV. Core 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 10-6.050 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(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(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(6)(C)3.B]

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 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be due June 1 each year for emissions produced during the previous calendar year. 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

- 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 10-3.030 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Lowe Boats, Inc. from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

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

This requirement is not federally enforceable.

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 recordkeeping 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.

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(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(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - 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, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi 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, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - 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.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten 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(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(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G 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 pursuant to 10 CSR 10-6.065(6)(C)1.

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

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

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

None

10 CSR 10-6.065(6)(C)3 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 EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and

- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The application requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(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)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, at least seven days in advance of these changes, except as allowed for

emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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 operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Rob Jones, Plant Manager. In September 2003, the Air Pollution Control Program was informed that John Parkhurst, Plant Manager is now the responsible official. 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(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) 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(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft 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 E
Method 9 Opacity Emissions Observations

This recordkeeping sheet or an equivalent form may be used for the recordkeeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer _____

ATTACHMENT F

PM Emissions Tracking Record for Surface Coating Operations (EU0020 through EU0060) and Carpet Gluing (EU0090 through EU0110)

This recordkeeping sheet or an equivalent form may be used to demonstrate compliance with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*. Use the calculations below to demonstrate compliance with both the PM Emission Rate and the PM Concentration.

Allowable PM Emission Rate

For process weight rates of 60,000 lb/hr or less: Allowable Emission Rate (lb/hr) $E = 4.1(P)^{0.67}$

Where: P = process weight rate (ton/hr)

$$\text{Controlled PM Emission Rate (lb/hr)} = (P)(\text{EmissionFactor}) \left[1 - \frac{\text{TransferEff}}{100} \right] \left[1 - \left(\frac{\text{OverallControlEff}}{100} \right) \right]$$

Where: Emission Factor (lb/ton) = (% solids/100) x (2000 lb/ton)

EU #	MHDR (gal/hr)	Density (lb/gal)	Process Weight (ton/hr)	% Solids	Emission Factor (lb/ton)	Transfer Efficiency (%)	Overall Control Device Efficiency (%)	Controlled Emission Rate (lb/hr)	Allowable Emission Rate (lb/hr)
Example	18.00	7.41	0.07	1.41	28.20	97	90	0.01	0.67
EU0020									
EU0030									
EU0040									
EU0050									
EU0060									
EU0090									
EU0100									
EU0110									

Allowable PM Concentration = 0.3 gr/scf

Controlled PM Concentration (gr/dscf) = Emission Rate (lb/hr) x (7000 grains/lb)/Stack flow rate (SCFM)/60(min/hr)

Flow rates converted from actual to standard conditions using the ideal gas law.

EU #	Controlled PM Emission Rate (lb/hr)	Stack Temp (°F)	Stack Flow Rate		Potential Concentration (gr/scf)	Allowable Concentration (gr/scf)
			ACFM	SCFM		
Example	0.01	77	17,570	17,276	0.000	0.3
EU0020						
EU0030						
EU0040						
EU0050						
EU0060						
EU0090						
EU0100						
EU0110						

STATEMENT OF BASIS

Permit Reference Documents

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

- 1) Part 70 Renewable Operating Permit Application, received June 4, 2003;
- 2) 2004 Emissions Inventory Questionnaire, received March 24, 2005;
- 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.

The following regulations were not included in the previous operating permit, but are included in this one.

- 1) 10 CSR 10-6.075, *Maximum Achievable Control Technology*
40 CFR Part 63, Subpart A *General Provisions* and Subpart VVVV *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*
This rule was not included in the previous operating permit but was included in the Part 70 renewal permit application and in this operating permit. Subpart VVVV was promulgated on August 22, 2001 which is after the date that the previous operating permit was issued.
- 2) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*
This rule was not included in the previous operating permit but was included in the Part 70 renewal permit application and in this operating permit. It replaces 10 CSR 10-3.080 which was rescinded.
- 3) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
This rule was not included in the previous operating permit but was included in the Part 70 renewal permit application and in this operating permit. It replaces 10 CSR 10-3.050 which was rescinded.

The following emission units were not included in the previous operating permit, but are included in this one.

- 1) Paint Room #3 - Paint Booth (EU0050)
This emission unit was not included in the previous operating permit but was included in the Part 70 renewal permit application and in this operating permit. Construction Permit 092002-011 authorized the installation of Paint Room #3-Paint Booth (EU0050) after the previous operating permit was issued.
- 2) Paint Room #2 - Multi Purpose Booth (EU0060)
This emission unit was not included in the previous operating permit or in the Part 70 renewal permit application but is included in this operating permit. Construction Permit 042005-008 authorized the

materials to an existing booth, EP-23. EP-23 is now identified as Paint Room #2 – Multi Purpose Booth (EU0060). This change was authorized after the previous operating permit was issued and the Part 70 renewal permit application was submitted.

3) Carpet Gluing 12A (EU0100)

This emission unit was not included in the previous operating permit but was included in the Part 70 renewal permit application and in this operating permit. An amendment to Construction Permit 1097-005 authorized the installation to move a portion of the floor gluing operation identified as EP-12 into another location. The new unit is identified in this operating permit as Carpet Gluing 12A (EU0100). The division of the gluing process was authorized after the previous operating permit was issued.

4) Carpet Gluing 12B (EU0110)

This emission unit was not included in the previous operating permit or in the Part 70 renewal permit application but is included in this operating permit. Applicability Determination Request - Project 2004-09-003 authorized the installation to re-divide the floor gluing operation identified as EP-12 into two separate locations. The two units are now identified as Carpet Gluing 12 (EU0090) and Carpet Gluing 12B (EU0110). The re-division of the gluing process was authorized after the previous operating permit was issued and the Part 70 renewal permit application was submitted.

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.

1) 10 CSR 10-3.050, *Restriction of Emission of Particulate Matter From Industrial Processes*

This rule was included in the previous operating permit but was not included in this operating permit because this rule was rescinded and replaced by 10 CSR 10-6.400.

2) 10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminants*

This rule was included in the previous operating permit but was not included in this operating permit because this rule was rescinded and replaced by 10 CSR 10-6.220.

3) 10 CSR 10-6.100, *Alternate Emission Limits*

This rule does not apply to this installation, because it is not in a non-attainment area for ozone.

Construction Permit Revisions

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

1) Construction Permit 1097-005

- a) Special Condition 1 (requiring VOC emitting materials to be kept in sealed containers), Special Condition 4 (establishing an emission limitation of 249 tons of VOC from the entire installation in any consecutive 12-month period), Special Condition 5 (establishing VOC recordkeeping requirements) and Special Condition 6 (requiring reporting of any exceedances of the VOC limit) are also contained in the more recent Construction Permit 042005-008 although the wording is slightly different. It is assumed that the Special Conditions 1, 4, 5, and 6 in Construction Permit 1097-005 are superseded by Construction Permit 042005-008.
- b) This construction permit was amended in 2001 to authorize the division and relocation of the gluing operation (EP-12). The divided and relocated gluing units are identified in this operating permit as Carpet Gluing 12 (EU0090) and Carpet Gluing 12A (EU0100).
- c) This construction permit listed 10 CSR 10-2.060 as an applicable requirement. This rule applied to the Kansas City metropolitan area only and was rescinded and replaced by 10 CSR 10-6.220.

- d) This construction permit listed 10 CSR 10-3.050 as an applicable requirement. This rule was rescinded and replaced by 10 CSR 10-6.400.
 - e) This construction permit listed 10 CSR 10-3.080 as an applicable requirement. This rule was rescinded and replaced by 10 CSR 10-6.220.
- 2) Construction Permit 092002-011
 - a) All special conditions found in this construction permit were superseded by Special Condition 1 of Construction Permit 042005-008 which states "The conditions of this permit supersede all special conditions found in the previously issued construction permits (Permit Numbers 092002-011 and 022004-002) from the Air Pollution Control Program."
 - b) This construction permit authorized the installation of a new paint booth (EP-21), a new touch-up paint booth (EP-22) and the relocation of the existing carpet gluing operation (EP-12). The touch-up paint booth (EP-22) was removed from the facility and is not included in this operating permit.
 - 3) Construction Permit 022004-002
 - a) All special conditions found in this construction permit were superseded by Special Condition 1 of Construction Permit 042005-008 which states "The conditions of this permit supersede all special conditions found in the previously issued construction permits (Permit Numbers 092002-011 and 022004-002) from the Air Pollution Control Program."

NSPS Applicability

None of the New Source Performance Standards (NSPS) regulations apply to this installation.

MACT Applicability

- 1) 40 CFR Part 63, Subpart VVVV, *National Emission Standards for Hazardous Air Pollutants for Boating Operations*
This rule applies to this installation and is included as Permit Condition PW002.
- 2) 40 CFR Part 63, Subpart II, *National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair Operations*
This rule is not applicable to this installation because the installation's operations do not meet the definition of shipbuilding or ship repair operations.
- 3) 40 CFR Part 63, Subpart MMMM *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*
This rule is not applicable to this installation because according to §63.3881(c)(15), this subpart does not apply to the surface coating of boats or metal parts of boats (including, but not limited to, the use of assembly adhesives) where the facility meets the applicability criteria for subpart VVVV of part 63.

None of the other Maximum Achievable Control Technology (MACT) regulations apply to this installation.

NESHAP Applicability

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*

40 CFR Part 61 Subpart M, *National Standards for Asbestos*

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

Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250

In the permit application and according to APCP records, there was no indication that any of these regulations apply to this installation. The installation is subject to these regulations if they undertake

any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

None of the other National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation.

CAM Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The entire installation has the potential to emit VOC and HAP above major source thresholds; however, no control devices (as defined by 40 CFR §64.1) are used to comply with any applicable VOC or HAP emission standards. Therefore, the installation is not required to submit a CAM plan under Part 64 at the time of Title V permit issuance.

Other Regulatory Determinations

1) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule was included for the drying ovens (EU0130 through EU0160) only for the purpose of restricting the emission units to burning either pipeline grade natural gas or liquid petroleum gas.

2) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

a) Plywood Cutting (EU0010)

Plywood Cutting is subject to this rule. The calculations below verify compliance with both the PM Emission Rate and the PM Concentration provided that the required control device is in operation and working properly:

Allowable PM Emission Rate

Emission Rate (lb/hr) $E = 4.1(P)^{0.67}$

Where: P = process weight rate

Controlled PM Emission Rate

$$\text{Emission Rate (lb/hr)} = (P)(\text{EmissionFactor}) \left[1 - \left(\frac{\text{OverallControlEff}}{100} \right) \right]$$

EU ID #	Process Weight (ton/hr)	Emission Factor (lb/ton)	Overall Control Device Efficiency (%)	Controlled Emission Rate (lb/hr)	Allowable Emission Rate (lb/hr)
EU0010	0.55	19.30	99	0.11	2.75

Controlled PM Concentration

Emission rate (gr/dscf) = Emission Rate (lb/hr) x (7000 grains/lb)/Stack flow rate (SCFM)/60(min/hr) Flow

EU ID #	Potential Controlled PM Emission Rate (lb/hr)	Stack Temp (°F)	Stack Flow Rate		Potential Concentration (gr/scf)	Allowable Concentration (gr/scf)
			ACFM	SCFM		
EU0010	0.11	77	3,200	3,146	0.004	0.3

b) Non-Carpent/Fabric Adhesive Operations (EU0120)

Non-Carpet/Fabric Adhesive Operations are exempt from 10 CSR 10-6.400 because according to 10 CSR 10-6.400(1)(B)7, fugitive emissions are exempt.

3) Emission Units Without Limitations

a) Welding (EP-19)

Welding is exempt from 10 CSR 10-6.400 because according to 10 CSR 10-6.400(1)(B)7, fugitive emissions are exempt. In addition, welding does not have any unit specific limitations at the time of permit issuance and therefore is listed as a Emission Unit Without Limitations.

b) Plasma Cutters (EP-20)

The plasma cutters are exempt from 10 CSR 10-6.400 because according to 10 CSR 10-6.400 (1)(B)11, emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter are exempt. The calculations below verify that this emission unit has a potential to emit less than 0.5 lb/hr of particulate matter. In addition, the plasma cutters do not have any unit specific limitations at the time of permit issuance and therefore are listed as Emission Units Without Limitations.

MHDR = 1 ton/hr (Source: 2004 EIQ)

PM₁₀ Emission Factor = 0.142 lb/ton (Source: 2004 EIQ)

Assume PM Emission Factor = 2 x PM₁₀ Emission Factor = 0.284 lb/ton

PTE = 1 ton/hr x 0.284 lb/ton = 0.284 lb/hr

c) Three Wash Booths

The wash booth operations consist of the application of a metal preparation solution. According to the Part 70 renewal permit application, the solution does not contain VOC. Therefore, the wash booths are not subject to the VOC emission limitation in Permit Condition PW001. In addition, the wash booths do not have any unit specific limitations at the time of permit issuance and therefore are listed as Emission Units Without Limitations.

d) Four Spray Foam Dispensers

The spray foam dispensers use a two part foam dispenser that when combined form a porous material used to fill, insulate, and provide buoyancy to the inner hulls of the boats. According to the Part 70 renewal permit application, the spray foam operations do not emit VOC. Therefore, the spray foam dispensers are not subject to the VOC emission limitation in Permit Condition PW001. In addition, the spray foam dispensers do not have any unit specific limitations at the time of permit issuance and therefore are listed as Emission Units Without Limitations.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

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

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

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the

installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:



Jill Wade, P.E.
Environmental Engineer