



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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JAN 21 2016

Mr. Dan Hoy
Tracker Marine - Clinton Facility
1275 N. Golden Drive
Clinton, MO 64735

Re: Tracker Marine - Clinton Facility, 083-0031
Permit Number: OP2015-051

Dear Mr. Hoy:

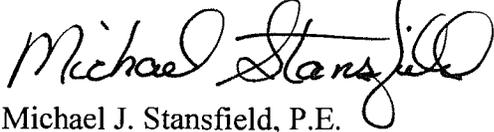
Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements 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 643.078.16 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 the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS:jw

Enclosures

c: PAMS File: 2014-11-004



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 herein.

Operating Permit Number: OP2015-051
Expiration Date: JAN 21 2021
Installation ID: 083-0031
Project Number: 2014-11-004

Installation Name and Address

Tracker Marine - Clinton Facility
1275 N. Golden Drive
Clinton, MO 64735
Henry County

Parent Company's Name and Address

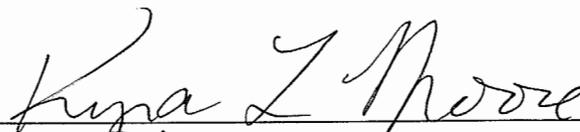
Tracker Marine LLC
2500 East Kearney
Springfield MO, 65803

Installation Description:

This facility manufactures fiberglass boats. Processes/emission units include cutting and sanding, gel-coat spray and curing, and combustion equipment used for heating. This facility is major for Hazardous Air Pollutant Emissions (HAPs) and Volatile Organic Compound Emissions (VOCs) and is subject to 40 CFR Parts VVVV.



Prepared by
Jill Wade
Operating Permit Unit



Director or Designee
Department of Natural Resources

JAN 21 2016

Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

This facility manufactures fiberglass boats. Processes/emission units include cutting and sanding, gel-coat spray and curing, and combustion equipment used for heating.

The facility operates both open and closed molding systems. Closed molding techniques are compression, injection, pultrusion, continuous lamination, marble casting, bag molding and resin transfer. Open molding processes are hand lay-up, filament winding and spray lay-up. Fugitive dust emissions results from the sanding and cutting.

This facility is major for Hazardous Air Pollutant Emissions (HAPs) and Volatile Organic Compound Emissions (VOCs) and is subject to 40 CFR Parts VVVV.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2013	2012	2011	2010	2009
Particulate Matter ≤ Ten Microns (PM ₁₀)	2.92	2.72	0.49	0.24	0.64
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	2.92	2.72	---	---	---
Sulfur Oxides (SO _x)	---	---	---	---	---
Nitrogen Oxides (NO _x)	1.40	1.33	1.33	---	---
Volatile Organic Compounds(VOC)	110.52	116.32	69.30	132.84	83.05
Carbon Monoxide (CO)	1.18	1.11	1.11	---	---
Hazardous Air Pollutants (HAPs)	0.15	---	---	---	---

EMISSION UNITS WITH SPECIFIC LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU01	Cutting and Sanding of Boat Hulls and Decks
EU02	Gelcoat Spray and Curing
EU05	Combustion Equipment

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance. These units are subject to the plant wide emission limitations that appear in the permit.

Description of Emission Source

Mechanical application of fiberglass
Cleanup Solvent (acetone)
Glue application and final boat assembly
Post Curing Oven
Engine Testing
300 gallon diesel storage tank
2-6,000 gallon resin storage tanks

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

Emission Limitations:

1. Standards for Open Molding Resin and Gel Coat Operations

- (a) The permittee must limit organic HAP emissions from the five open molding operations listed in paragraphs (a)(1) through (5) of this section to the emission limit specified in paragraph (b) of this section. Operations listed in paragraph (d) are exempt from this limit. [§63.5698(a)]
- (1) Production resin. [§63.5698(a)(1)]
 - (2) Pigmented gel coat. [§63.5698(a)(2)]
 - (3) Clear gel coat. [§63.5698(a)(3)]
 - (4) Tooling resin. [§63.5698(a)(4)]
 - (5) Tooling gel coat. [§63.5698(a)(5)]
- (b) The permittee must limit organic HAP emissions from open molding operations to the limit specified by equation 1 of this section, based on a 12-month rolling average. [§63.5698(b)]

$$HAP\ Limit = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \quad (Eq.1)$$

Where:

$HAP\ Limit$ = total allowable organic HAP that can be emitted from the open molding operations, kilograms.

M_R = mass of production resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

M_{PG} = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

M_{CG} = mass of clear gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

M_{TR} = mass of tooling resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

M_{TG} = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, megagrams.

- (c) The materials specified in paragraphs (d)(1) through (3) of this section are exempt from the open molding emission limit specified in paragraph (b) of this section. [§63.5698(d)]
- (1) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats,

rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. The permittee must keep a record of the resins for which you are using this exemption. [§63.5698(d)(1)]

(2) Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at your facility on a 12-month rolling-average basis. The permittee must keep a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. [§63.5698(d)(2)]

(3) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at your facility on a 12-month rolling-average basis. The permittee must keep a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used. [§63.5698(d)(3)]

2. Standards for Closed Molding Resin Operations

(a) If a resin application operation meets the definition of closed molding specified in §63.5779, there is no requirement to reduce emissions from that operation. [§63.5728(a)]

(b) If the resin application operation does not meet the definition of closed molding, then you must comply with the limit for open molding resin operations specified in §63.5698. [§63.5728(b)]

(c) Open molding resin operations that precede a closed molding operation must comply with the limit for open molding resin and gel coat operations specified in §63.5698. Examples of these operations include gel coat or skin coat layers that are applied before lamination is performed by closed molding. [§63.5728(c)]

3. Standards for Resin and Gel Coat Mixing Operations

(a) All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters, including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times. [§63.5731(a)]

(b) The work practice standard in paragraph (a) of this section does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [§63.5731(b)]

(c) To demonstrate compliance with the work practice standard in paragraph (a) of this section, the permittee must visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover. [§63.5731(c)]

(d) The permittee must keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken. [§63.5731(d)]

4. Standards for Resin and Gel Coat Application Equipment Cleaning Operations

(a) For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the permittee must use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies. [§63.5734(a)]

- (b) The permittee must store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR part 63, subpart . Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid. [§63.5734(b)]
5. Standards for Carpet and Fabric Adhesive Operations
- (a) The permittee must use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight. [§63.5740(a)]
- (b) To demonstrate compliance with the emission limit in paragraph (a) of this section, the permittee must determine and record the organic HAP content of the carpet and fabric adhesives using the methods in §63.5758. [§63.5740(b)]

Monitoring and Compliance Options:

1. Compliance options for the open molding emission limit:
- (a) Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option. [§63.5701(a)]
- (1) Demonstrate that emissions from the open molding resin and gel coat operations that are averaged meet the emission limit in §63.5698 using the procedures described in §63.5710. Compliance with this option is based on a 12-month rolling average. [§63.5701(a)(1)]
- (2) Those operations and materials not included in the emissions average must comply with either paragraph (b) or (c) of this section. [§63.5701(a)(2)]
- (b) Compliant materials option. Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 2 to this subpart. Compliance with this option is based on a 12-month rolling average. [§63.5701(b)]
2. General requirements for complying with the open molding emission limit:
- (a) Emissions averaging option. For those open molding operations and materials complying using the emissions averaging option, the permittee must demonstrate compliance by performing the steps in paragraphs (a)(1) through (5) of this section. [§63.5704(a)]
- (1) Use the methods specified in §63.5758 to determine the organic HAP content of resins and gel coats. [§63.5704(a)(1)]
- (2) Complete the calculations described in §63.5710 to show that the organic HAP emissions do not exceed the limit specified in §63.5698. [§63.5704(a)(2)]
- (3) Keep records as specified in paragraphs (a)(3)(i) through (iv) of this section for each resin and gel coat. [§63.5704(a)(3)]
- (i) Hazardous air pollutant content. [§63.5704(a)(3)(i)]
- (ii) Amount of material used per month. [§63.5704(a)(3)ii]
- (iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology. [§63.5704(a)(3)(iii)]
- (iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in §63.5710. [§63.5704(a)(3)(iv)]
- (4) Prepare and submit the implementation plan described in §63.5707 to the Director and keep it up to date. [§63.5704(a)(4)]

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- (5) Submit semiannual compliance reports to the Director as specified in §63.5764. [§63.5704(a)(5)]
 - (b) Compliant materials option. For each open molding operation complying using the compliant materials option, the permittee must demonstrate compliance by performing the steps in paragraphs (b)(1) through (4) of this section. [§63.5704(b)]
 - (1) Use the methods specified in §63.5758 to determine the organic HAP content of resins and gel coats. [§63.5704(b)(1)]
 - (2) Complete the calculations described in §63.5713 to show that the weighted-average organic HAP content does not exceed the limit specified in Table 2 to this subpart. [§63.5704(b)(2)]
 - (3) Keep records as specified in paragraphs (b)(3)(i) through (iv) of this section for each resin and gel coat. [§63.5704(b)(3)]
 - (i) Hazardous air pollutant content. [§63.5704(b)(3)(i)]
 - (ii) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology. [§63.5704(b)(3)(ii)]
 - (iii) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements. [§63.5704(b)(3)(iii)]
 - (iv) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in §63.5713. [§63.5704(b)(3)(iv)]
 - (4) Submit semiannual compliance reports to the Administrator as specified in §63.5764. [§63.5704(b)(4)]
 3. The implementation plan for open molding operations:
 - (a) The permittee must prepare an implementation plan for all open molding operations for which you comply by using the emissions averaging option described in §63.5704(a). [§63.5707(a)]
 - (b) The implementation plan must describe the steps that will be taken to bring the open molding operations covered by this subpart into compliance. For each operation included in the emissions average, the implementation plan must include the elements listed in paragraphs (b)(1) through (3) of this section. [§63.5707(b)]
 - (1) A description of each operation included in the average. [§63.5707(b)(1)]
 - (2) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions. [§63.5707(b)(1)]
 - (3) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in §63.5698. [§63.5707(b)(3)]
 - (c) The permittee must submit the implementation plan to the Director with the notification of compliance status specified in §63.5761. [§63.5707(c)]
 - (d) The permittee must keep the implementation plan on site and provide it to the Director when asked. [§63.5707(d)]
 - (e) If the implementation plan is revised, the permittee must submit the revised plan with the next semiannual compliance report specified in §63.5764. [§63.5707(e)]
 4. Demonstrating compliance using emissions averaging:
 - (a) Compliance using the emissions averaging option is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). The first 12-month rolling average period begins on the compliance date specified in §63.5695. [§63.5710(a)]
 - (b) At the end of the twelfth month after the compliance date and at the end of every subsequent month, use equation 1 of this section to demonstrate that the organic HAP emissions from those

operations included in the average do not exceed the emission limit in §63.5698 calculated for the same 12-month period. (Include terms in equation 1 of §63.5698 and equation 1 of this section for only those operations and materials included in the average.) [§63.5710(b)]

(Eq. 1)

$$HAP \text{ emissions} = [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})]$$

Where:

HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.

PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram.

M_R = Mass of production resin used in the past 12 months, megagrams.

PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram.

M_{PG} = Mass of pigmented gel coat used in the past 12 months, megagrams.

PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram.

M_{CG} = Mass of clear gel coat used in the past 12 months, megagrams.

PV_{TR} = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram.

M_{TR} = Mass of tooling resin used in the past 12 months, megagrams.

PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram.

M_{TG} = Mass of tooling gel coat used in the past 12 months, megagrams.

- (c) At the end of every month, use equation 2 of this section to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average. [§63.5710(c)]

(Eq. 2)

$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)}$$

Where:

PV_{OP} = weighted-average MACT model point value for each open molding operation (*PV_R*, *PV_{PG}*, *PV_{CG}*, *PV_{TR}*, and *PV_{TG}*) included in the average, kilograms of HAP per megagram of material applied.

M_i = mass of resin or gel coat *i* used within an operation in the past 12 months, megagrams.

n = number of different open molding resins and gel coats used within an operation in the past 12 months.

PV_i = the MACT model point value for resin or gel coat *i* used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

- (d) The permittee must use the equations in Table 3 to this subpart to calculate the MACT model point value (PVi) for each resin and gel coat used in each operation in the past 12 months. [§63.5710(d)]
- (e) If the organic HAP emissions, as calculated in paragraph (b) of this section, are less than the organic HAP limit calculated in §63.5698(b) for the same 12-month period, then the facility is in compliance with the emission limit in §63.5698 for those operations and materials included in the average. [§63.5710(e)]
5. Demonstrating compliance using compliant materials:
- (a) Compliance using the organic HAP content requirements listed in Table 2 to this subpart is based on a 12-month rolling average that is calculated at the end of every month. The first 12-month rolling average period begins on the compliance date specified in §63.5695. If using filled material (production resin or tooling resin), the permittee must comply according to the procedure described in §63.5714. [§63.5713(a)]
- (b) At the end of the twelfth month after your compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 2 to this subpart, then the facility is in compliance with the emission limit specified in §63.5698 for that 12-month period for that operation. In addition, there is no need to complete the weighted-average organic HAP content calculation contained in paragraph (c) of this section for that operation. [§63.5713(b)]
- (c) At the end of every month, the permittee must use equation 1 of this section to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months. [§63.5713(c)]

$$\text{Weighted Average HAP Content (\%)} = \frac{\sum_{i=1}^n (M_i \text{HAP}_i)}{\sum_{i=1}^n (M_i)} \quad (\text{Eq. 1})$$

Where:

M_i = mass of open molding resin or gel coat i used in the past 12 months in an operation, megagrams.

HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation. Use the methods in §63.5758 to determine organic HAP content.

n = number of different open molding resins or gel coats used in the past 12 months in an operation.

- (d) If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 2 to this subpart, then you are in compliance with the emission limit specified in §63.5698. [§63.5713(d)]
6. Demonstrating compliance if I use filled resins:
- (a) If using a filled production resin or filled tooling resin, the permittee must demonstrate compliance for the filled material on an as-applied basis using equation 1 of this section. [§63.5714(a)]

$$PV_F = PV_u \times \frac{(100 - \% \text{ Filler})}{100} \quad (\text{Eq. 1})$$

Where:

PV_F = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 to this subpart.

$\% \text{ Filler}$ = The weight-percent of filler in the as-applied filled resin system.

- (b) If the filled resin is used as a production resin and the value of PV_F calculated by equation 1 of this section does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance. [§63.5714(b)]
 - (c) If the filled resin is used as a tooling resin and the value of PV_F calculated by equation 1 of this section does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance. [§63.5714(c)]
 - (d) If including a filled resin in the emissions averaging procedure described in §63.5710, then use the value of PV_F calculated using equation 1 of this section for the value of PV_i in equation 2 of §63.5710. [§63.5714(c)]
7. Demonstrating compliance with the resin and gel coat application equipment cleaning standards:
- (a) Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in §63.5734 using the methods specified in §63.5758. [§63.5737(a)]
 - (b) If recycling cleaning solvents on site, the permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in §63.5758 for demonstrating compliance with organic HAP content limits. [§63.5737(b)]
 - (c) At least once per month, the permittee must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers. [§63.5737(c)]

Methods for Determining Hazardous Air Pollutant Content:

- 1. Determine the organic HAP content for each material used. To determine the organic HAP content for each material used in the open molding resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations, the permittee must use one of the options in paragraphs (a)(1) through (6) of this section. [§63.5758(a)]
 - (a) Method 311 (appendix A to 40 CFR part 63). The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section 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 1.0 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, there is no need to include it in the organic HAP total. Express the mass fraction of each organic HAP you measure 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). The permittee 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). The permittee 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. The permittee may use an alternative test method for determining mass fraction of organic HAP if you obtain prior approval by the Administrator. The permittee 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. The permittee may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (4) of this section, such as manufacturer's formulation data, according to paragraphs (a)(5)(i) through (iii) of this section. [§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 1.0 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 it does not have to be included 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 the permittee 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 paragraphs (a)(1) through (4) of this section exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee 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, the permittee 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 paragraphs (a)(1) through (4) of this section is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 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, the permittee may use the values for organic HAP content that are listed in Table 5 or 6 to this subpart. The permittee may use Table 6 to this subpart only if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 to this subpart 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 this subpart, then the test results must be used for determining compliance.

[§63.5758(a)(6)]

2. Determine the volume fraction 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, the permittee must use one of the methods specified in paragraphs (b)(1) through (3) of this section. If the results obtained with paragraphs (b)(2) or (3) of this section do not to agree with those obtained according to paragraph (b)(1) of this section, the permittee must use the results obtained with paragraph (b)(1) of this section to determine compliance. [§63.5758(b)]
 - (a) ASTM Method D2697–86(1998) or D6093–97. The permittee 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. The permittee 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. The permittee may determine it using equation 1 of this section: [§63.5758(b)(3)]

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

Where:

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

m_{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.

3. Determine the density of each aluminum recreational boat wipedown solvent and surface coating. 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, the permittee must use the test results to demonstrate compliance. [§63.5758(c)]

Reporting:

1. The permittee must submit all of the notifications in Table 7 to this subpart that apply by the dates in the table. The notifications are described more fully in 40 CFR part 63, subpart A, General Provisions, referenced in Table 8 to this subpart. [§63.5761(a)]
2. If the permittee changes any information submitted in any notification, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change. [§63.5761(b)]

3. The permittee must submit the applicable reports specified in paragraphs (b) through (e) of this section. To the extent possible, the permittee must organize each report according to the operations covered by this subpart and the compliance procedure followed for that operation. [§63.5761(a)]
4. Unless the Director has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report by the dates in paragraphs (b)(1) through (5) of this section. [§63.5764(b)]
 - (a) If the source is not controlled by an add-on control device (i.e., complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the first compliance report must cover the period beginning 12 months after the compliance date specified for the source in §63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first 12-month period after the compliance date that is specified for the source in §63.5695. If the source is controlled by an add-on control device, the first compliance report must cover the period beginning on the compliance date specified for the source in §63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for the source in §63.5695. [§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 paragraph (b)(1) of this section. [§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 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section. [§63.5764(b)(5)]
5. The compliance report must include the information specified in paragraphs (c)(1) through (7) of this section. [§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, application equipment requirement, or MACT model point value averaging provision 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 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 the source deviated from an emission limit or work practice standard during the reporting period, the permittee must also include the information listed in paragraphs (c)(7)(i) through (iv) of this section 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 taken to minimize the deviation and actions taken to prevent it from happening again. [§63.5764(c)(7)(iii)]
 - (iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [§63.5764(c)(7)(iv)]
4. If the facility has an add-on control device, you must submit semiannual compliance reports and quarterly excess emission reports as specified in §63.10(e). The contents of the reports are specified in §63.10(e). [§63.5764(d)]
 5. If the facility has an add-on control device, the permittee must complete a startup, shutdown, and malfunction plan as specified in §63.6(e), and the permittee must submit the startup, shutdown, and malfunction reports specified in §63.10(e)(5). [§63.5764(e)]
 6. Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

Recordkeeping:

1. The permittee must keep a copy of each notification and report that you submitted to comply with this subpart. [§63.5767(a)]
2. The permittee must keep all documentation supporting any notification or report that you submitted. [§63.5767(b)]
3. If the facility is not controlled by an add-on control device (i.e., you are complying with organic HAP content limits, application equipment requirements, or MACT model point value averaging provisions), the permittee must keep the records specified in paragraphs (c)(1) through (3) of this section. [§63.5767(c)]
 - (a) The total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, you must also record the amounts of each applied by atomized and nonatomized methods. [§63.5767(c)(1)]
 - (b) 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)]
 - (c) 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)]
4. If the facility has an add-on control device, the permittee must keep the records specified in §63.10(b) relative to control device startup, shut down, and malfunction events; control device performance tests; and continuous monitoring system performance evaluations. [§63.5767(d)]
5. The records must be readily available and in a form so they can be easily inspected and reviewed. [§63.5770(a)]
6. The permittee must keep each record for 5 years following the date that each record is generated. [§63.5770(b)]

7. The permittee must keep each record on site for at least 2 years after the date that each record is generated. The permittee can keep the records offsite for the remaining 3 years. [§63.5770(c)]
8. The permittee can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche. [§63.5770(d)]

PERMIT CONDITION PW002

10 CSR 10-6.060, Construction Permits Required, Construction Permit #112006-011

Emissions Limitation:

1. The permittee shall emit less than 250 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period. [Special Condition #2A.]
2. The permittee shall keep all paints, solvents, and cleaning solutions in sealed containers whenever materials are not in use. The permittee shall provide and maintain suitable, easily read permanent markings on all paints and solvents and cleaning solution containers used. [Special Condition #3]
3. If a continuing situation of demonstration of nuisance odors exists in violation of 10 CSR 10-6.165- Restriction of Emission of Odors, the Director may require the permittee to submit a corrective action plan within ten days of the request (or alternate schedule if approved by the Director) that is adequate to timely and significantly mitigate the cause(s) of the odors. The permittee shall implement any such plan immediately upon its approval by the Director. Failure either to submit such a corrective action plan if requested, or to implement such a plan after approval by the Director shall be a violation. [Modified Special Condition #4.]

Recordkeeping:

1. The permittee shall calculate and record the installation-wide emissions of VOC.
2. Attachment A contains a log including these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement. [Modified Special Condition #2B.]
3. These records shall include Material Safety Data Sheets (MSDS) for all materials used at the installation, and shall be made available immediately for inspection to Department of Natural Resources personnel upon request. [Modified Special Condition #2B.]
4. All records shall be maintained for five years [Modified Special Condition #2B.]

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 end of the month during which Attachment A indicates that the installation has exceeded the emissions limitation. [Modified Special Condition #2C.]
2. Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001 10 CSR 10-6.400 Restriction of Particulate Matter Emissions from Industrial Processes (Conditional Exemption)

Emission Unit	Description
EU01	Cutting and Sanding of Boat Hulls and Decks Controlled by fabric filter (CD1) with 99% efficiency
EU02	Gelcoat Spray and Curing Controlled by Dust Collectors with (C-2A, C-2B and C-2C) 97% efficiency

Operational Limitation:

- 1) The permittee shall operate and maintain a particulate matter control device system for EU01 and EU02 that controls at least 90% of particulate matter emissions.
 - a) The permittee shall operate Control Device CD1- Fabric Filter to control particulate matter emissions from the cutting and sanding of boat hulls and decks;
 - b) The permittee shall maintain Control Devices C-2A, C-2B and C-2C – Fabric Filters to control particulate matter emissions from gelcoat spray and curing.
- 2) The permittee shall maintain the control equipment within the design conditions specified by the manufacturer’s performance warranty. The permittee shall maintain a copy of the manufacturer’s performance warranty on site.
- 3) The permittee shall maintain an operating and maintenance log for the fabric filters which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions and replacements, etc.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 002
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Unit	Description
EU01	Cutting and Sanding of Boat Hulls and Decks
EU02	Gelcoat Spray and Curing

Emission Limitation:

- 1) The permittee shall not cause or permit emissions to be discharged into the atmosphere from any **new** source any visible emissions with an opacity greater than twenty percent. Exception: If the source is altered, repaired, or rebuilt at a cost of fifty percent (50%) or more of its replacement cost exclusive of routine maintenance, it shall no longer be existing, but shall be considered new as defined in this regulation.

New source: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971 or in the Springfield metropolitan area after September 24, 1971.

Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to sixty percent.

Monitoring:

- 1) The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA 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 once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

- 1) The permittee shall maintain records of all observation results (see Attachment B), 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 D)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment C)
- 4) Attachments B, C and D, contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to 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's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 003
 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

EU05 – Combustion Equipment				
Location	Make	Model	S/N	Max Heat Input (MMbtu/hr)
Main Plant	Weather Rite	TOT 224 HHL outdoor	8765B1	3.11
	Weather Rite	TOT 224 HHL outdoor	8765B2	3.11
	King	DFOC-220B-HRS	87-DF-3569	1.655
	King	DFOC-220B-HRS	87-DF-3366	1.655
	King	DFOC-220B-HRS	87-DF-3367	1.655
	King	DFOC-220B-HRS	87-DF-3368	1.655
	King	DFOC-220B-HRS	87-DF-3369	1.655
	King	DFOC-220B-HRS	87-DF-3370	1.655
	Weather Rite	TOT 224 HHL outdoor	8765A	6.00
	King	DAC-230-HRS	N/A	4.00
	RayPak (water heater)	E1631TB	8765B1	3.11

Emission Limitation:

1. The permittee shall not cause or permit emissions to be discharged into the atmosphere from any **existing** source any visible emissions with an opacity greater than 40%.
Existing source-any equipment, machine, device, article, contrivance or installation installed or in construction in the outstate Missouri area on February 24, 1971 or in the Springfield metropolitan area on September 24, 1971.
 Exception: If the source is altered, repaired, or rebuilt at a cost of fifty percent (50%) or more of its replacement cost exclusive of routine maintenance, it shall no longer be existing, but shall be considered new as defined in this regulation.

2. The permittee shall not cause or permit emissions to be discharged into the atmosphere from any **new** source any visible emissions with an opacity greater than 20%.
New source: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971 or in the Springfield metropolitan area after September 24, 1971.
3. Exception: The permittee 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/Record Keeping/Reporting:

None.

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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 submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) 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.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

10 CSR 10-6.280 Compliance Monitoring Usage
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| <p>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:</p> <ul style="list-style-type: none">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; andc) Any other monitoring methods approved by the director. <p>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:</p> <ul style="list-style-type: none">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; andc) Compliance test methods specified in the rule cited as the authority for the emission limitations. <p>3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:</p> <ul style="list-style-type: none">a) Applicable monitoring or testing methods, cited in:<ul style="list-style-type: none">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”;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. |
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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 Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, 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, record keeping, 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(6)(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(6)(C)1.I 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, 11201 Renner Blvd., Lenexa, KS 66219, 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 applicable 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, 11201 Renner Blvd., Lenexa, KS 66219, 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), record keeping, 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, 11201 Renner Blvd., Lenexa, KS 66219, 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 contemporaneous 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, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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)39 Responsible Official

The application utilized in the preparation of this permit was signed by Dan Hoy, Director of Facilities, Bass Pro Shops. 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 (MDNR) 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) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 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) MDNR 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 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 C

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

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 Operating Permit Application, received November 4, 2014;
- 2) 2013 Emissions Inventory Questionnaire, received April 29, 2014;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) WebFIRE; and
- 5) Construction Permit 112006-011.

Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit History

The following construction permits were issued for this installation:

- 1) Construction Permit 1092-009
This permit was issued to authorize production of fiberglass boats. This permit was superseded by Construction Permit 112006-001. Therefore, this permit is not included in this Operating Permit.
- 2) Revised Special Conditions for Construction Permit 1092-009
This letter revised the special conditions for Construction Permit 1092-009. This permit was superseded by Construction Permit 112006-001. Therefore, this permit is not included in this Operating Permit.
- 3) Construction Permit Amendment 1092-009A
This permit amended special conditions of Construction Permit 1092-009. This permit was superseded by Construction Permit 112006-001. Therefore, this permit is not included in this Operating Permit.
- 4) Construction Permit Amendment 1092-009B
This permit amended special conditions of Construction Permit 1092-009. This permit was superseded by Construction Permit 112006-001. Therefore, this permit is not included in this Operating Permit.
- 5) No Permit Required Project # 1998-10-051
This letter authorizes the modification of the vent systems on the resin bulk storage tanks. This project does not result in an emissions increase, therefore a Construction Permit is not required.
- 6) No Permit Required Project # 2006-01-009
This letter authorizes the installation of a post curing oven. This is an electric unit that will not result in an emissions increase, therefore a Construction Permit is not required.

7) No Permit Required Project # 2006-06-085

This project was an applicability determination request, which resulted in the permittee submitting an application which was given Construction Permit number 112006-011. Therefore, this project is not included in this Operating Permit.

8) Construction Permit 112006-011

This permit was issued November 16, 2006 to authorize the installation of a closed molding machine. This Construction Permit supersedes all previously issued Construction Permits and their amendments. This project includes all equipment installed under the No Permit Required Projects listed above under the plant wide VOC limit. This permit contains special conditions and applies 40 CFR part 63 Subpart VVVV-*National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*.

9) No Permit Required Project # 2008-12-003

This letter authorizes the addition of a warehouse. This is not a production expansion, nor does it result in an emissions increase, therefore a Construction Permit is not required.

New Source Performance Standards (NSPS) Applicability

40 CFR part 60, Subpart D , *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971*

40 CFR part 60, Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978*

40 CFR part 60, Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (applies after June 19, 1984)*

40 CFR part 60, Subpart Dc , *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (applies after June 9, 1989)*

The “boilers” that are on site are detailed in Table 1 are not subject to these rules because they have a maximum heat input rate less than 10 MMBtu/hr.

40 CFR part 60, Subpart K, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978*

40 CFR part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

40 CFR part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

All tanks at the installation have capacities less than 19,813 gallons (75m³), therefore these rules do not apply.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR part 63 Subpart VVVV-*National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*

This installation had potential to emit HAPs above the major source thresholds prior to August 21, 2001, and therefore be subject to this regulation. [see 40 CFR part 63 Subpart VVVV, Table 1]. The affected source (the portion of your boat manufacturing facility covered by this subpart) is the combination of all of the boat manufacturing operations listed in paragraphs (a) through (f) of this section.

- (a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).
- (b) Closed molding resin operations.
- (c) Resin and gel coat mixing operations.
- (d) Resin and gel coat application equipment cleaning operations.
- (e) Carpet and fabric adhesive operations.
- (f) Aluminum hull and deck coating operations, including solvent wipedown operations and paint spray gun cleaning operations, on aluminum recreational boats.

The installation does not perform Aluminum operations; therefore those sections of the rule have not been included in this Operating Permit.

40 CFR Part 63, Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*

This subpart does not apply to the combustion equipment at this facility because it does not meet the definition of Industrial Boiler or Process Heater in the subpart. The combustion equipment is used to provide comfort heat to the facility.

40 CFR Part 63, Subpart T-*National Emission Standards for Halogenated Solvent Cleaning*

The installation does not use any of the solvents regulated in this rule.

40 CFR Part 63, Subpart P-*National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Stands*

This subpart does not apply to the engine testing at this facility because it is an existing affected source and according to §63.9290(b) “Existing affected sources do not have to meet the requirements of this subpart or of subpart A.”

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements 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.

Compliance Assurance Monitoring (CAM) Applicability

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

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	7.4
HAP	>10.0 / >25.0
NO _x	8.8
PM ₁₀	11.4
PM _{2.5}	11.4
SO _x	0.05
VOC	< 250.0

Potential Emissions were calculated using the most recent data submitted on the Emissions Inventory Questionnaire.

Other Regulatory Determinations

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

This regulation applies to the combustion equipment at this facility (see table 1 below). Because this equipment combusts natural gas it is practically unlikely that the opacity limitations will be violated therefore no monitoring, record keeping or reporting was required for Permit Condition 004.

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

Emission Units EU01 and EU02 are required by Permit Condition 001 to maintain control equipment with a control efficiency at least 90% to control particulate matter emissions therefore according to 6.400(1)(A)(15) they are exempt from this regulation.

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

The combustion units at this installation combust only pipeline-grade natural gas, and therefore meet the exemption in (1)(A)2.

Table 1: Combustion equipment (all natural gas fired)

Location	Make	Model	S/N	Max Heat Input (MMbtu/hr)
Main Plant	Weather Rite	TOT 224 HHL outdoor	8765B1	3.11
	Weather Rite	TOT 224 HHL outdoor	8765B2	3.11
	King	DFOC-220B-HRS	87-DF-3569	1.655
	King	DFOC-220B-HRS	87-DF-3366	1.655
	King	DFOC-220B-HRS	87-DF-3367	1.655
	King	DFOC-220B-HRS	87-DF-3368	1.655
	King	DFOC-220B-HRS	87-DF-3369	1.655
	King	DFOC-220B-HRS	87-DF-3370	1.655
	Weather Rite	TOT 224 HHL outdoor	8765A	6.00
	King	DAC-230-HRS	N/A	4.00
	RayPak (water heater)	E1631TB	1286106626	1.63

10 CSR 10-6.405, Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating

Combustion equipment is exempt from this rule according to 6.405(1)(E) because only natural gas is burned in these units.

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).

Response to Public Comment

The draft Part 70 Operating Permit for Tracker Marine – Clinton Facility (083-0031) was placed on public notice as of June 19, 2015 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm>. On July 6, 2015 the Air Pollution Control Program received comments from Leslie Werner (on behalf of Mark Smith), EPA Region 7. The comments are addressed below in the order in which they appear within the letter.

Comment #1: Section I – Installation Description and Equipment Listing includes subsections MDNR-APCP has titled “Emission Units with Limitations” and “Emission Units without Limitations.” The Emission Units without Limitations title is misleading in that the units listed are in fact subject to plant wide emission limits; core permit requirements and general permit requirements. EPA suggests that MDNR-APCP consider adding the word “specific” to describe the limitations.

Response to Comment: The word “Specific” has been added as suggested.

Comment #2: This draft operating permit identifies EU01, EU02 and EU05 as the only emission units “with limitations.” However, Permit to Construct #1092-009, authorized production of fiberglass boats using both hand laid matte and chop gun applied fiberglass. This process involves EP1 – cutting and sanding of hulls and decks; EP2 – Gel coat spray up and curing; EP-3 – Fiberglass roll-on lamination (hand lay-up); and EP9 – Final assembly (glue application). Also included, within this initial permit to construct, were EP4 – 10 natural gas-fired space heaters; EP5 – 3 natural gas-fired boilers; EP7 – 300 gallon diesel storage tank; and EP8 – two 6,000 gallon styrene storage tanks. The combination of EP1, EP2, EP3, and EP9 make up an “open molding resin and gel coat operation;” with EP4, EP5, EP7 and EP8 appearing to be support functions. Then on November 16, 2006, MDNR-APCP issued Permit to Construct #112006-011 which authorized Tracker Marine – Clinton to install a “closed molding” operation identified as EP10. Therefore, it appears that the facility has two separate fiberglass boat manufacturing systems; one “open manufacturing system” and one “closed manufacturing system.” Both construction permits include special conditions and therefore, it appears to EPA, that EP03, EP09 and EP10 are also emission units with specific limitations and should be included in the listing.

Response to Comment: It is explained in the Statement of Basis that Construction Permit 1092-009 and any subsequent amendments to Construction Permit 1092-009 were superseded by Construction Permit 112006-011 which is why any special conditions contained in these construction permits was not included in the operating permit. Construction Permit 112006-001 contains a special condition limiting plant-wide VOC emissions to 250 tons/year and a condition to keep all paints, solvents, and cleaning solutions in sealed containers. Both of these special conditions are included in Permit Condition PW002. Neither is applied specifically to any one or group of emission units therefore the emission units mentioned above remain in the emission units without specific limits.

Comment #3: The operating permit lists “Dust Collector Equipment (see Table 2 in the Statement of Basis) as an emission unit without limitations. However there is no Table 2 in the Statement of Basis. Additionally, there is no mention or discussion of “dust collector equipment” in any of the construction permits. EPA recommends MDNR-APCP clarify the emission unit entry regarding dust collector equipment.

Response to Comment: These control devices help control emissions from EU01 and EU02. They should not be listed as emission units, therefore they have been removed from the list of emission units without specific limitations. They have been included in the emission unit descriptions for EU01 and EU02 within the permit.

Comment #4: The installation description in Section 1 should provide sufficient information to allow for a complete and expeditious evaluation of permit terms and conditions. The installation description in this draft operating permit lacks the pertinent information to allow for a determination of appropriateness of the permit conditions. EPA strongly recommends MDNR-APCP expand the installation description in Section I, highlighting the manufacturing processes; both "open molding" and "closed molding" and specify the options the permittee employs to meet their compliance obligations.

Response to Comment: An additional paragraph has been added to the installation description which includes the processes associated with both open and closed molding operations. However, the installation description is not the appropriate place to specify compliance options. This is done within the permit and in the Statement of Basis when needed.

Comment #5: Section II, according to the draft operating permit, is for the describing of Plant Wide Emission Limitations. Permit Condition PW001 details the applicable requirements derived from 40 CFR Part 63, Subpart VVVV. It appears to EPA that these applicable requirements are not plant wide emission limitations but are in fact emission limitations to specific processes in use. Additionally, the presentation of requirements applicable to the “open molding” process intermixed with the requirements applicable to the “closed molding” process results in a single permit condition which is very confusing. Also inclusion of all the various compliance options available to the permittee, would appear to result in requirements placed on the permittee which are not applicable. Next, most of the permit condition requirements indicate “you” as the individual responsible for undertaking the compliance activities. MDNR-APCP customary convention is to use “permittee.” Finally, there are several references to the “Administrator,” where “Director” may be more appropriate.

Response to Comment: The facility exists to manufacture boats and MACT VVVV regulates hazardous air pollutant emissions from Boat Manufacturing therefore it is reasonable that MACT VVVV is included as a plant-wide emission limitation. This is done often in APCP permits. The facility is familiar with this way of organizing the permit and the placement of this particular permit condition therefore I do not feel there is enough benefit added to split the condition into multiple permit conditions and move it within the permit. The permit condition contains options for compliance with MACT VVVV which include emissions averaging and a compliant materials option. I do not believe it is confusing to leave both options in the permit and allow the permittee the flexibility to choose the option that best fits the operation at any given time, therefore

both options will remain in the permit. The use of “you” in place of “the permittee” has been corrected as well as all references to the “Administrator” have been changed to “Director,” as suggested.

Comment #6: Permit Condition PW001 appears to be an attempt by MDNR-APCP to incorporate-by-reference the applicable requirements from MACT VVVV. EPA’s guidance regarding IBR is that all emission limits; compliance determination methods; and monitoring record keeping and reporting requirements must be clearly incorporated into the permit. EPA strongly recommends that MDNR-APCP revise Permit Condition PW001 to incorporate EPA guidance regarding IBR and ensure PW001 includes all applicable emission limits; all monitoring requirements; all record keeping and reporting requirements; and the specific compliance determination method. EPA also recommends MDNR-APCP incorporate by reference test methods; calculation methods/equations needed to determine compliance and inspection maintenance plans.

Response to Comment: Although incorporating by reference certain paragraphs of the MACT regulations (such as test methods and equations) can be beneficial it is not a requirement for each P70 permit. Permit Condition PW001 contains all emission limits, compliance determination method and monitoring, recordkeeping and reporting requirements for this facility. I do not believe it improves the permit to take out the test methods, calculation methods etc. and incorporate by reference in this case therefore they will remain within the permit condition.

Comment #7: Permit Condition 001 includes an Operational Limitation requiring the permittee to maintain control equipment within design conditions specified by the manufacturer’s performance warranty. This operational limitation is too vague as to be enforceable from a practical matter. EPA recommends that the operating permit contains explicit requirements, not just manufacturer’s specifications. As such, EPA recommends MDNR-APCP amend operational limitation 2) to include the specific conditions specified in the warranty.

Response to Comment: Requiring the permittee to operate equipment according to the manufacturer’s performance warranty is a common condition included in construction permits and is sometimes included in operating permit conditions as well. I have added the requirement that a copy be kept on-site.

Comment #8: Emission limitations in Permit Condition 002 and Emission limitations in Permit Condition 004 identify “owner or other person” and “person” as the individuals with compliance responsibilities. EPA recommends MDNR-APCP use “permittee” in lieu of “owner or other person” and “person.”

Response to Comment: This change has been made to Permit Condition 002 as suggested.

Comment #9: Emission/Operational Limitations 1 and 4 in Permit Condition 003 are not enforceable as a practical matter. Each operating permit condition requirement must be practically enforceable and EPA’s guidance on practical enforceability defines a practically enforceable permit condition as one which answers “who,” “what,” “where,” “when,” “how,”

and “how often.” EPA recommends MDNR-APCP amend these conditions to ensure practical enforceability.

Additionally, emission/operational limitation 3, requires the permittee to operate and maintain their combustion equipment in a manner consistent with safety and good engineering practices for minimizing emissions. This requirement is too vague to be enforceable from a practical matter. As such, EPA recommends MDNR amend this condition to include more specific compliance requirements that make clear the permittee’s obligations to the permittee, regulators and the public in order to ensure practical enforceability.

Finally, emission/operational limitation 2 requires the permittee to meet each operating limit in Table 4 of 40 CFR Part 63 Subpart DDDDD. EPA recommends that MDNR-0APCP include the specific operating limits Tracker Marine – Clinton must meet as stipulated in Table 4.

Response to Comment: The language used in Emission/Operational Limitations 1-4 of Permit Condition 003 were taken directly from 40 CFR Part 63 Subpart DDDDD. Each limitation is cited from the rule. It is not the policy of the APCP to gap fill MACT standards within operating permits. Emission/Operational Limitation 2 which references Table 4 of Subpart DDDDD has been removed from the permit condition because none of the operating limits in Table 4 apply to EU05.

Comment #10: The language regarding the written notification requirement for Off-Permit Changes in Section V used in operating permits has recently been modified to more closely match the wording in 10 CSR 10-6.065(6)(C)5. Therefore, EPA recommends MDNR use the newer Off-Permit Change wording in the operating permit.

Response to Comment: The language for Off-Permit Changes in Section V has been updated.

Note: After receiving additional information from the facility it was determined that 40 CFR Part 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters does not apply to the combustion equipment at this facility. The combustion equipment is used solely to provide comfort heat for the facility and therefore does not meet the definition of “process heater” provided in the subpart. Permit Condition 003 was removed from the final operating permit.