

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 022009-003 Project Number: 2008-11-052

Parent Company: Tracker Marine Group

Parent Company Address: 2500 East Kearney, Springfield, MO 65803

Installation Name: Tracker Marine - Lebanon Plant

Installation Address: 1500 Maple Lane, Lebanon, MO 65536

Location Information: Laclede County, S14, T34N, R16W

Application for Authority to Construct was made for:
Installation of a new paint booth (EP-10[Seg.1]) and heat treat oven (EP-11).
This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

FEB - 5 2009

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

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

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

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

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

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

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

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SPECIAL CONDITIONS:

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

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

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

1. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permits (Permit Number 042001-007, 072003-017 and 072003-017A) from the Air Pollution Control Program.
2. **Emission Limitation – Volatile Organic Compounds and Hazardous Air Pollutants**
 - A. Tracker Marine - Lebanon Plant shall emit less than 250 tons of Volatile Organic Compounds (VOCs) from the installation in any consecutive 12-month period. This limit applies to the VOC emissions from all equipment/ processes installed or permitted at the Tracker Marine - Lebanon Plant as of the date of this permit.
 - B. Tracker Marine - Lebanon Plant shall emit less than ten (10) tons individually or twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the installation in any consecutive 12-month period. This limit applies to the HAP emissions from all equipment/ processes installed or permitted at the Tracker Marine - Lebanon Plant as of the date of this permit.
 - C. Tracker Marine - Lebanon Plant shall emit less than 0.02 tons of 1,6-hexamethylene diisocyanate (CAS Number 822-06-0) from the paint booth (EP-10[Seg.1]) and heat treat oven (EP-11) in any consecutive 12-month period.
 - D. Attachment A, Attachment B and Attachment C or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A, 2.B and 2.C. Tracker Marine - Lebanon Plant shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in conjunction with all emission points.

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SPECIAL CONDITIONS:

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

- E. Tracker Marine - Lebanon Plant shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2.D indicate that the source exceeds the limitation of Special Conditions Number 2.A, 2.B or 2.C.
3. Use of Alternative Coatings in Paint Booth (EP-10[Seg.1])
- A. When considering using an alternative material in the new paint booth that is different than a material listed in the Application for Authority to Construct, Tracker Marine - Lebanon Plant shall calculate the potential emissions of volatile organic compounds (VOCs) and each individual HAP in the alternative material.
 - B. Tracker Marine - Lebanon Plant shall seek approval from the Air Pollution Control Program before use of the alternative material in the following cases:
 - i. If the potential VOC emissions for the alternative material is equal to or greater than 43.8 tons per year (tpy) for a paint coating, 16.5 tpy for a hardener, 19.0 tpy for the primer or 18.8 tpy for the toluene wipe.
 - ii. If the potential individual HAP emissions for the alternative material is equal to or greater than the Screening Model Action Levels (SMAL) for any compound listed in Attachment E.
 - C. Attachment D or an equivalent form shall be used to show compliance with Special Condition 3.A and 3.B. Tracker Marine - Lebanon Plant shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
4. Control Device – Fabric Filters (C-1D, C-1E and C-1F)
Tracker Marine shall control Particulate Matter less than ten microns in diameter (PM₁₀) from the paint booth (EP-10[Seg.1]), while in operation, using a MAT filter (C-1D), fabric filter (C-1E) and fiberglass filter (C-1F) as specified in the permit application. The filters shall be operated and maintained in accordance with the manufacturer's specifications.

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SPECIAL CONDITIONS:

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

5. **Solvent and Cleaning Cloths**
Tracker Marine - Lebanon Plant shall keep the solvent and cleaning solutions in sealed containers whenever the materials are not in use. Tracker Marine - Lebanon Plant shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with this equipment.

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

Project Number: 2008-11-052
Installation ID Number: 105-0046
Permit Number:

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

Complete: December 23, 2008

Parent Company:
Tracker Marine Group
2500 East Kearney
Springfield, MO 65803

Laclede County, S14, T34N, R16W

REVIEW SUMMARY

- Tracker Marine - Lebanon Plant has applied for authority to install a new paint booth (EP-10[Seg.1]) and heat treat oven (EP-11).
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are xylenes, methyl isobutyl ketone, ethyl benzene, 1,6-hexamethylene diisocyanate (HDI) and toluene.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to the proposed equipment. The Maximum Achievable Control Technology (MACT) standard, 40 CFR Part 63, Subpart VVVV, *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing* do not apply to the installation because Tracker Marine is not, due to conditions in this permit and their Intermediate Operating Permit Application, a major source.
- A MAT filter (C-1D), fabric filter (C-1E) and fiberglass filter (C-1F) are being used to control particulate matter less than ten (10) microns in diameter (PM₁₀) emissions from paint booth #1 (EP-10[seg.1]) in this permit.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs for this project are above de minimis levels, but below major source levels. All other pollutants are below de minimis levels. Potential emissions of VOCs and individual and total HAPS for the installation are conditioned to less than major levels.
- This installation is located in Laclede County, an attainment area for all criteria air pollutants.

- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed for this review. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions. Emissions of HAPs are condition to less than screen threshold and major levels.
- Emissions testing is not required for the new equipment.
- Either an amendment to your Intermediate Operating Permit is required for this installation within 90 days of equipment startup or a Part 70 Operating Permit application is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

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

Tracker Marine submitted a renewal to the installation's Intermediate Operating Permit on November 19, 2007 and is currently under Technical Review. This renewal however, does not contain the new emission points in this permit. Therefore, Tracker Marine is required to submit either a Part 70 Operating Permit Application or an amended Intermediate Operating Permit Application. The following Construction permits have been issued to Tracker Marine - Lebanon Plant from the Air Pollution Control Program.

Table 1: Previously Issued Construction Permits

Permit Number	Description
0497-017	Installation of an aluminum boat manufacturing facility
0599-005	Installation of a new paint booth
042001-007	Modification to 0497-017 for an increase in VOC emissions restrictions
072003-017	Installation of a new paint booth
072003-017A	Alternative VOC reporting

PROJECT DESCRIPTION

Tracker Marine proposes to install an additional paint booth and heat treat oven to coat aluminum boats at their installation in Lebanon, Missouri. The proposed paint booth and heat treat oven are being moved from the Bolivar plant. It will be known as paint booth #1 (EP-10 [seg. 1]). Paint booth #1 is replacing an existing paint booth that was permitted in Permit No. 0599-005 and will be installed in the current location of paint booth #2 (EP-10 [seg. 2]) which has been moved 75' from its former location. The existing paint booth (known formerly as paint booth #1, EP-4) has been removed and the associated electric oven (drier #1) transferred to the new paint booth #2 location. Drier #2, that was previously located with paint booth #2, has been removed. The emission points for the proposed paint booth and the current paint booth #2 have been renamed to EP-10[seg. 1] and EP-10[seg. 2]. This project will be based on the emissions of the proposed paint booth and heat treat oven being moved from the Bolivar plant.

The booth uses four (4) types of coatings: paint, primer, a hardener, and a toluene wipe (the toluene wipe is considered a different emission point, EP-10A). The paint's maximum hourly design rate is 1.8 gallons and the maximum hourly design rate for the primer, hardener, and the toluene is 0.60 gallons. After coating, each boat will be dried in a heat treat oven. The heat treat oven has a heat input of 1.5 million BTUs per hour.

The maximum hourly design rates were based on 0.75 gallons of paint and 0.25 gallons each of the primer, hardener, and thinner per boat. The maximum boat production is one boat every 25 minutes.

Tracker Marine submitted an Intermediate Operating Permit renewal on November 19, 2007. Tracker Marine may choose to revise their current Intermediate Operating Permit application and reestablish the 100 ton per year installation-wide VOC limitation. An installation-wide 250 tpy VOC limit is given in this permit in the event that the 100 ton per year VOC is removed from the Operating Permit or Tracker Marine decides to submit a Part 70 Operating Permit.

EMISSIONS/CONTROLS EVALUATION

The project's potential emissions are primarily VOCs and HAPs that are associated with the new spray booth (EP-10[seg.1]) and toluene wipe (EP-10A). Potential emissions were estimated using a mass balance approach and information obtained from the Material Safety Data Sheets (MSDS). 100 percent of the VOC and HAP content of the paint, primer, hardener and toluene are assumed to be emitted into the atmosphere. PM₁₀ emissions from the application of the coatings were evaluated based on the solids content of the paint and transfer efficiency from electrostatic spray application. A 75 percent transfer efficiency was assumed. If not specifically stated in the MSDS, the solids content of the material was estimated by taking the density of the material and subtracting out the volatile content. The remainder was assumed to be PM₁₀. A combined control efficiency of 99% was given for use of the three filters in the paint booth. The highest potential emissions for total VOCs, combined HAPs, each individual HAPs and PM₁₀ were then used to determine the worst case potential emissions for

each paint, primer, hardener as well as the toluene wipe.

The emission factors used for estimating the emissions from natural gas combustion in the heat treat oven were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4, *Natural Gas Combustion* (07/1998).

The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit Number 072003-017. Since the previous paint booth permitted in 072003-017 has been removed, the existing potential emissions do not include its potential emissions. Existing actual emissions were taken from the installation's 2007 Emission Inventory Questionnaire (EIQ). Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.)

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels ¹	Existing Potential Emissions	Existing Actual Emissions (2007 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	14.72	0.50	0.20	N/A
SO _x	40.0	0.01	N/A	<<0.01	N/A
NO _x	40.0	5.60	N/A	0.63	N/A
VOC	40.0	<100	62.47	98.01	<250
CO	100.0	1.00	N/A	0.53	N/A
HAPs	10.0/25.0	<10.0	N/D	42.58	<10/25
Methanol	10.0	6.3	N/D	N/A	<10
Methylene chloride	10.0	8.70	N/D	N/A	<10
Toluene	10.0	<10.0	N/D	18.79	<10
Xylene	10.0	<10	N/D	18.77	<10
Methyl Isobutyl ketone	10.0	N/A	N/D	3.90	<10
HDI	0.02	N/D	N/D	0.06	<0.02
Ethyl Benzene	10.0	N/D	N/D	1.04	,10

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

¹ The regulatory levels listed for individual HAPs are Screening Model Action Level (SMAL).

PERMIT RULE APPLICABILITY

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

APPLICABLE REQUIREMENTS

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

GENERAL REQUIREMENTS

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

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400*
- *Restriction of Emission of Sulfur Compounds, 10 CSR 10-6.260*
- *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating, 10 CSR 10-3.060*

STAFF RECOMMENDATION

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

Susan Heckenkamp
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated December 17, 2008, received December 23, 2008, designating Tracker Marine Group as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southwest Regional Office Site Survey, dated January 2009.
- Material Safety Data Sheets

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor Joseph P. Bindbeutel, Acting Director

www.dnr.mo.gov

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

RE: New Source Review Permit - Project Number: 2008-11-052

Dear Mr. Kelsay:

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

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:smhl

Enclosures

c: Southwest Regional Office
PAMS File: 2008-11-052

Permit Number: