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: 052013-001  Project Number: 2013-02-021
Installation Number: 105-0046

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 powder coating system, a new wood router, a burn-off oven, and ancillary equipment. 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.

MAY 7, 2013

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 Department’s Air Pollution Control Program of the anticipated date of start up of these air contaminant sources. The information must be made available within 30 days of actual startup. 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 these air contaminant sources.

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.
SPECIAL CONDITIONS:

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

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

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

1. Superseding Condition
The conditions of this permit supersede Special Condition 2 (VOC Emissions Limitation) through Special Condition 5 found in the previously issued construction permit (Permit Number 082009-006) issued by the Air Pollution Control Program.

2. VOC and HAPs Emission Limitations
   A. Tracker Marine - Lebanon Plant shall emit less than 250.0 tons of VOCs in any consecutive 12-month period from the entire installation. This limit applies to the VOC emissions from all equipment/ processes installed or permitted at the Tracker Marine - Lebanon Plant as of the issuance date of this permit (see Appendix B).
   
   B. Attachment A, or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A.

3. Control Device Requirement- Booth and Filter
   A. Tracker Marine - Lebanon Plant shall control emissions from Powder Coat Booth #1 (PC-1), Powder Coat Booth #2 (PC-2) and Clear Powder Coat Booth (PC-3) using booths and filter media for each application as specified in the permit application.
   
   B. The filter media shall be operated and maintained in accordance with the manufacturer's specifications, which shall be kept on site.
   
   C. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

D. Tracker Marine - Lebanon Plant shall maintain an operating and maintenance log for the filter media which shall include the following:
   1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

4. Operational Requirement – Solvent and Cleaning Solutions
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.

5. Use of Alternative Coatings in Paint Booths EP-10[Seg.1], EP-10[Seg.3] and EP-10[Seg.4] (Special Condition 3 from Permit 082009-006)
   A. When considering using an alternative material in the paint booths that is different than the materials listed in the Application for Authority to Construct, Tracker Marine - Lebanon Plant shall calculate the potential emissions of volatile organic compounds (VOCs) in the alternative 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:
      1) For EP-10[Seg.1], if the potential VOC emissions for the alternative material is equal to or greater than 43.8 tons per year (tpy) for the paint, 16.5 tpy for the hardener or 19.0 tpy for the primer.
      2) For EP-10[Seg.3], if the potential VOC emissions for the alternative material is equal to or greater than 62.5 tpy for the paint or 39.1 tpy for the primer.
      3) For EP-10[Seg.4], if the potential VOC emissions for the alternative material is equal to or greater than 57.0 tpy for the paint, 2.7 tpy for the hardener, 36.3 tpy for the primer, 1.75 tpy for the polyurea liner or 28.1 tpy for the camouflage paint combined.

   C. Attachment B or an equivalent form shall be used to show compliance with Special Condition 5.A and 5.B. Tracker Marine - Lebanon Plant shall maintain all records required by this permit for not less than five (5) years
SPECIAL CONDITIONS:

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

and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

6. Control Device – Filters (Special Condition 4 from Permit 082009-006)
When either paint booths (EP-10[Seg.3]) or (EP-10[Seg.4]) is operating, Tracker Marine shall control Particulate Matter less than ten microns in diameter (PM$_{10}$) using the following filters as specified in the permit application. The filters shall be operated and maintained in accordance with the manufacturer's specifications.

- MAT filter (C-1G), fabric filter (C-1H) and fiberglass filter (C-1I) for EP-10[Seg.3]
- MAT filter (C-1J), fabric filter (C-1K) and fiberglass filter (C-1L) for EP-10[Seg.4]

7. Record Keeping and Reporting Requirements
A. Tracker Marine - Lebanon Plant shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used.

B. Tracker Marine - Lebanon Plant shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.
REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW
Project Number: 2013-02-021
Installation ID Number: 105-0046
Permit Number:

Tracker Marine - Lebanon Plant Complete: April 4, 2013
1500 Maple Lane
Lebanon, MO 65536

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 powder coating system, a new wood router, a burn-off oven, and ancillary equipment.

• HAP emissions are expected from the proposed equipment. HAPs of concern from this process are xylene (CAS # 1330-20-7) and ethylbenzene (CAS # 100-41-4).

• None of the New Source Performance Standards (NSPS) apply to the installation. This type of burn-off oven is considered a rack, part, and drum reclamation unit and is therefore exempt from 40 CFR 60, Subpart CCCC, Standards of Performance for Commercial and Industrial Solid Waste Incineration Units.

• 40 CFR Part 63 Subpart VVVV, National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, applies to this installation.

• Filters are being used to control the PM, PM$_{10}$, and PM$_{2.5}$ emissions from the equipment 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 air pollutants for this project are below de minimis levels; however, potential emissions of VOC are conditioned to minor source levels for the entire installation.

• This installation is located in Laclede County, an attainment area for all criteria pollutants.

• This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
• 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. HAP emissions are below their respective SMAL standards.

• Emissions testing is not required for the equipment.

• Modification to the 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 Group owns and operates an aluminum boat manufacturing installation in Lebanon, Missouri (Laclede County) referenced as Tracker Marine – Lebanon Plant (Tracker). 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 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 is a minor source under construction permitting. A Part 70 Operating Permit is currently being issued to the installation (Project 2012-04-065). The following New Source Review permits have been issued to Tracker Marine from the Air Pollution Control Program.

Table 1: Permit History

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>0497-017</td>
<td>Installation of an aluminum boat manufacturing facility</td>
</tr>
<tr>
<td>0599-005</td>
<td>Installation of a new paint booth</td>
</tr>
<tr>
<td>042001-007</td>
<td>Modification to 0497-017 for an increase in VOC emissions restrictions</td>
</tr>
<tr>
<td>072003-017</td>
<td>Installation of a new paint booth</td>
</tr>
<tr>
<td>072003-017A</td>
<td>Alternative VOC reporting</td>
</tr>
<tr>
<td>022009-003</td>
<td>Installation of a new paint booth (EP-10[Seg.1]) and heat treat oven (EP-11)</td>
</tr>
<tr>
<td>082009-006</td>
<td>Construction of a dual paint booth (EP-10[Seg.3], single paint booth (EP-10[Seg.4]) and plasma cutters (EP-11[Seg.1 and seg.2]) in the former Myacht building (to be renamed Plant #2).</td>
</tr>
<tr>
<td>082009-006A</td>
<td>Emission point notation correction</td>
</tr>
<tr>
<td>022009-003A</td>
<td>Emission point notation correction</td>
</tr>
</tbody>
</table>

PROJECT DESCRIPTION

Tracker has applied for authority to install a powder coating system, a new wood router, a burn-off oven, and ancillary equipment at their existing plant to allow the plant to increase production by 25% over the next five years. According to the applicant, the
maximum production rate will be 42 boats daily (8,140 annually) for Modified V, 59 boats daily (11,537 annually) for utility boats, and 27 boats daily (5291 annually) for V-bottom. Tracker proposes to convert the painting process from liquid paints to powder coatings, build two additions to the plant to accommodate changes in the equipment, and add a stack for touchup painting. Based on these changes, Tracker also proposes new emission unit and release point designations for the new and existing equipment. Appendix B lists the equipment and the proposed timing of construction.

Tracker has requested to include the new equipment in the existing installation-wide 250 ton per year limit for VOC emissions. Therefore, the special conditions of the previous construction permit (Permit 082009-006) have been superceded and a new 250 ton per year VOC limit is being established in this construction permit. Tracker has also requested to consolidate Special Condition 3 and 4 of Permit 082009-006 into this construction permit. Consequently, these conditions are superceded by this construction permit and re-appear as Special Conditions 5 and 6. For a description of the necessity of these particular special conditions, see Permit 082009-006.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4 Natural Gas Combustion (7/98).

The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit 082009-006. Existing actual emissions were taken from the installation’s 2011 EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year).

Table 2: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>25.0 N/D</td>
<td>N/D</td>
<td>8.80</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>15.0 22.05</td>
<td>N/D</td>
<td>4.13</td>
<td>8.80</td>
<td>N/A</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>10.0 N/D</td>
<td>N/D</td>
<td>8.80</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>SOx</td>
<td>40.0 0.03</td>
<td>0</td>
<td>0.07</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>NOx</td>
<td>40.0 8.4</td>
<td>0</td>
<td>11.53</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0 &lt;250.0</td>
<td>87.85</td>
<td>43.70</td>
<td>&lt;250.0</td>
<td>N/A</td>
</tr>
<tr>
<td>CO</td>
<td>100.0 2.62</td>
<td>0</td>
<td>9.68</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>GHG (CO$_{2}$e)</td>
<td>100,000 N/D</td>
<td>N/D</td>
<td>13,755</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>GHG (mass)</td>
<td>250.0 N/D</td>
<td>N/D</td>
<td>13,741</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0 &gt;10/&gt;25 (major)</td>
<td>10.79</td>
<td>0.52</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

N/A = Not Applicable; N/D = Not Determined
The new router will be installed in the plywood cutting room with other existing routers. The MHDR for this equipment was supplied by Tracker Marine based on historical usage and inherent bottlenecks for plywood cutting. The emission factor was taken from previous reviews including the recently issued operating permit for this installation.

The potential emissions from the electrostatic powder coating operation and touch-up painting were calculated using a mass balance approach. The potential emissions for each pollutant were determined using the MHDR, the weight percent found in the MSDS, and the density of material also found in the MSDS.

The maximum paint usage rate of 0.14 gallons per hour for the touch-up painting and MSDS were supplied by Tracker Marine.

The maximum hourly powder coating usage rate is 450 pounds of powder coating per hour for all three powder coating booths. This is based on a maximum amount of 25 pounds of powder coating per coat, with two coats being applied per boat. A maximum of 90 boats per shift was supplied by the applicant. Per AP-42, electrostatic powder coating typically has a transfer efficiency of 93 percent. Tracker Marine also has a fabric filter control device with a manufacturer stated control efficiency of 99.9 percent at 0.5 micron particle size. A more conservative control efficiency of 98 percent was applied to the control device in the calculation of the potential emissions. VOC and HAP emissions are not expected from the powder coating operation since, according to the accompanying MSDS data, no volatile material or HAP is contained in the powder coating material.

The acid wipe-down (EU-27) is a consolidation of all the wipe-down locations into one emission unit. The acid wipe-down is intended to replace the toluene wipe-down process prior to the liquid paint-booths. Therefore, the MHDR was based on the historical usage of toluene. Tracker Marine intends to replace the wipe-down process with the acid wash process (EU-15) once the liquid booths are taken out of service. No regulated air pollutants are associated with the materials used in the acid wash process.

Several natural gas combustion sources are being installed, including a dry-off oven, infrared ovens, cure oven, a burn-off oven, make-up air units, and space heaters. Emissions were calculated from the combustion of natural gas only. The burn-off oven will produce some particulate matter. However, these emissions are insignificant compared to emissions from natural gas combustion. In addition, the burn-off oven (EU-26) is being installed to remove powder coating material build-up from the load bars of the powder coat system. A burn-off oven is a type of incinerator, and a construction permit is required for all types of incinerators.

Increases to the gluing, foaming, cutting and welding operations were calculated using the potential emissions at the new MHDR as submitted in the application and the actual emissions from the 2010 and 2011 EIQ submissions. VOC and PM\textsubscript{10} potential emissions for gluing and foaming were based on data taken from the MSDS of the raw materials. Revisions to actual emissions of part of the gluing operations were proposed by the applicant and taken into account during this review. PM\textsubscript{10} potential emissions of welding and cutting were based on information from the applicant and supported by previous permit reviews.
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 VOC are conditioned to minor source levels for the entire installation.

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.

GENERAL REQUIREMENTS

- Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110
- 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 10-6.165

SPECIFIC REQUIREMENTS

- Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400
- MACT Regulations, 10 CSR 10-6.075
  - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, 40 CFR Part 63, Subpart VVVV
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.

________________________________   _________________________________
Emily Wilbur                                            Date
New Source Review Unit

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated February 6, 2013, received February 7, 2013, designating Tracker Marine Group as the owner and operator of the installation.

Attachment A - VOC Compliance Worksheet

Tracker Marine - Lebanon Plant
Laclede County, S14, T34N, R16W
Project Number: 2013-02-021
Installation ID Number: 105-0046
Permit Number: _____

This sheet covers the month of ___________ in the year ___________.

Copy this sheet as needed.

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2 (a)</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used (Name, Type)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (lbs/gal)</td>
<td>VOC Content (Weight %)</td>
<td>VOC Emissions (Tons)</td>
</tr>
<tr>
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</tr>
</tbody>
</table>

(b) Total VOC Emissions Calculated for this Month in Tons:

c) 12-Month VOC Emissions Total from Previous Month's Worksheet A, in Tons:

(d) Monthly VOC Emissions Total (b) from Previous Year's Worksheet A, in Tons:

(e) Current 12-month Total of VOC Emissions in Tons: [(b) + (c) - (d)]

Instructions:

a. Choose appropriate VOC calculation method for units reported:
   1. If usage is in tons - [Column 2] x [Column 4] = [Column 5];
   2. If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
   3. If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].

b. Summation of [Column 5] in Tons;

c. 12-Month VOC emissions total (e) from last month's Worksheet A, in Tons;

d. Monthly VOC emissions total (b) from previous year's Worksheet A, in Tons;

e. Calculate the new 12-month VOC emissions total. A 12-Month VOC emissions total (e) of less than 250.0 tons for the entire installation indicates compliance.
**Attachment B**

**New Coating Potential to Emit (PTE) Calculation Sheet**

for EP-10[Seg. 3], EP-10[Seg.4] and EP10A

Tracker Marine - Lebanon Plant
Laclede County, S14, T34N, R16W
Project Number: 2013-02-021
Installation ID Number: 105-0046
Permit Number:

Date: ________________

Copy this sheet as needed.

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 8</th>
<th>Column 9 (d)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used (Name, Type)</td>
<td>Application Rate (Gallons per year)</td>
<td>Density (Pounds per gallon)</td>
<td>VOC Content (Weight %) or (Pounds per gallon)</td>
<td>VOC PTE (Ton per Year)</td>
</tr>
<tr>
<td>Example, paint ABC</td>
<td>15,768</td>
<td>8.17</td>
<td>61.8</td>
<td>39.8</td>
</tr>
</tbody>
</table>

**Instructions:** Calculate the potential emissions total VOCs contained in the material.

a. Choose appropriate VOC calculation method for units reported:
   1. If VOC content is in weight %, then [Column 3] x [Column 4] x [Column 8] / 2,000 / 100 = [Column 9].
   2. If VOC content is in lb/gal, then [Column 3] x [Column 8] / 2,000 = [Column 9].

b. Choose appropriate paint booth emission point:
   1. For EP-10[Seg.1], if the potential VOC emissions for the alternative material is equal to or greater than 43.8 tons per year (tpy) for the paint, 16.5 tpy for the hardener or 19.0 tpy for the primer.
   2. For EP-10[Seg.3], if the potential VOC emissions for the alternative material is equal to or greater than 62.5 tpy for the paint or 39.1 tpy for the primer.
   3. For EP-10[Seg.4], if the potential VOC emissions for the alternative material is equal to or greater than 57.0 tpy for the paint, 2.7 tpy for the hardener, 36.3 tpy for the primer, 1.75 tpy for the polyurea liner or 28.1 tpy for the camouflage paint combined.
APPENDIX A

Abbreviations and Acronyms

% .......... percent
°F .......... degrees Fahrenheit
acfm ...... actual cubic feet per minute
BACT ..... Best Available Control Technology
BMPs ..... Best Management Practices
Btu......... British thermal unit
CAM ...... Compliance Assurance Monitoring
CAS ........ Chemical Abstracts Service
CEMS ..... Continuous Emission Monitor System
CFR .......... Code of Federal Regulations
CO .......... carbon monoxide
CO₂ .......... carbon dioxide
CO₂e ........ carbon dioxide equivalent
COMS ..... Continuous Opacity Monitoring System
CSR......... Code of State Regulations
dscf ...... dry standard cubic feet
EIQ ........ Emission Inventory Questionnaire
EP .......... Emission Point
EPA ........ Environmental Protection Agency
EU .......... Emission Unit
fps .......... feet per second
ft ............ feet
GACT ..... Generally Available Control Technology
GHG ....... Greenhouse Gas
gpm ...... gallons per minute
gr .......... grains
GWP ...... Global Warming Potential
HAP ....... Hazardous Air Pollutant
hr .......... hour
hp .......... horsepower
lb .......... pound
lbs/hr ...... pounds per hour
MACT ..... Maximum Achievable Control Technology
µg/m³ ...... micrograms per cubic meter
m/s .......... meters per second
Mgal ...... 1,000 gallons
MW ........ megawatt
MHDR ...... maximum hourly design rate
MMBtu .... Million British thermal units
MMCF ..... million cubic feet
MSDS ...... Material Safety Data Sheet
NAAQS ... National Ambient Air Quality Standards
NESHAPs .......... National Emissions Standards for Hazardous Air Pollutants
NO₂ .......... nitrogen oxides
NSPS ...... New Source Performance Standards
NSR ...... New Source Review
PM .......... particulate matter
PM₂.₅ ...... particulate matter less than 2.5 microns in aerodynamic diameter
PM₁₀ ...... particulate matter less than 10 microns in aerodynamic diameter
ppm ...... parts per million
PSD ........ Prevention of Significant Deterioration
PTE .......... potential to emit
RACT ...... Reasonable Available Control Technology
RAL ......... Risk Assessment Level
SCC ...... Source Classification Code
scfm ...... standard cubic feet per minute
SIC ......... Standard Industrial Classification
SIP ......... State Implementation Plan
SMAL .... Screening Model Action Levels
SO₂ .......... sulfur oxides
tpm ...... tons per hour
tpy ...... tons per year
VMT ......... vehicle miles traveled
VOC ...... Volatile Organic Compound
### APPENDIX B
List of Equipment and Scheduled Construction

<table>
<thead>
<tr>
<th>Emission Unit Number</th>
<th>Emission Unit Description</th>
<th>Proposed Emission Unit Number</th>
<th>Stage 1</th>
<th>Stage 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-13</td>
<td>FLOATATION FOAMING</td>
<td>EU-01</td>
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<td></td>
</tr>
<tr>
<td>EP - 01A</td>
<td>GLUING OPERATIONS (Fugitive - Assembly Line)</td>
<td>EU-02A</td>
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<tr>
<td>EP - 01B</td>
<td>GLUING OPERATIONS (HEPA Filter)</td>
<td>EU-02B</td>
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<tr>
<td>EP - 06</td>
<td>GASOLINE STORAGE TANK</td>
<td>EU-03A/EU-3B</td>
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<tr>
<td>EP - 07</td>
<td>DIESEL STORAGE TANK</td>
<td>EU-04A/EU-4B</td>
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<tr>
<td>EP - 06A</td>
<td>WELDING - WIRE USAGE</td>
<td>EU-05A</td>
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<tr>
<td>EP - 08B</td>
<td>WELDING - ROD USAGE</td>
<td>EU-05B</td>
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<tr>
<td>EP - 09</td>
<td>PLYWOOD CUTTING (SAWDOUST)</td>
<td>EU-06</td>
<td>Install new Router</td>
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<tr>
<td>EP-10(1)</td>
<td>PAINT BOOTH #1</td>
<td>N/A</td>
<td>Remove</td>
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<tr>
<td>EP-10(2)</td>
<td>Drying Oven for Paint Booth #1</td>
<td>N/A</td>
<td>Remove</td>
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<tr>
<td>EP - 10(2)</td>
<td>PAINT BOOTH #2</td>
<td>EU 07</td>
<td>Move and convert to touch-up only</td>
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<tr>
<td>EP - 12(2)</td>
<td>Drying Oven for Paint Booth #2</td>
<td>N/A</td>
<td>Remove</td>
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<tr>
<td>EP - 10(3)</td>
<td>PAINT BOOTH #3</td>
<td>EU-08</td>
<td>Remove</td>
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<tr>
<td>EP - 12(3)</td>
<td>Drying Oven for Paint Booth #3</td>
<td>EU-08A</td>
<td>Remove</td>
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</tr>
<tr>
<td>EP - 10(4)</td>
<td>PAINT BOOTH #4</td>
<td>EU-09</td>
<td>Remove</td>
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<tr>
<td>EP - 12(4)</td>
<td>Drying Oven for Paint Booth #4</td>
<td>EU-09A</td>
<td>Remove</td>
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</tr>
<tr>
<td>EP - 11(1)</td>
<td>PLASMA CUTTER #1 - 875.2 in/boat</td>
<td>EU-11</td>
<td>Move to West side addition</td>
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<tr>
<td>EP - 11(2)</td>
<td>PLASMA CUTTER #2 - 6,255.2 in/boat</td>
<td>EU-10</td>
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<tr>
<td>EP - 11(3)</td>
<td>PLASMA CUTTER #3 - 7,300 in/boat</td>
<td>EU-12</td>
<td>Move to West side addition</td>
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<tr>
<td>EP - 11(4)</td>
<td>PLASMA CUTTER #4 - 7,400 in/boat</td>
<td>EU-13</td>
<td>Move to West side addition</td>
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<tr>
<td>N/A</td>
<td>PONTOON BOAT TOUCH UP SPRAY PAINTING</td>
<td>EU-14</td>
<td>Add Stack</td>
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<tr>
<td>N/A</td>
<td>ACID WASH</td>
<td>EU-15</td>
<td>Install - Plant 1</td>
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<tr>
<td>N/A</td>
<td>DRY-OFF OVEN</td>
<td>EU-16</td>
<td>Install - Plant 1</td>
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<tr>
<td>N/A</td>
<td>POWDER COAT BOOTH #1</td>
<td>EU-17</td>
<td>Install - Plant 1</td>
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<td>N/A</td>
<td>INFRARED OVEN #1</td>
<td>EU-18</td>
<td>Install - Plant 1</td>
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<td>N/A</td>
<td>POWDER COAT BOOTH #2</td>
<td>EU-19</td>
<td>Install - Plant 1</td>
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<td>N/A</td>
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<td>EU-20</td>
<td>Install - Plant 1</td>
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<tr>
<td>N/A</td>
<td>CLEAR POWDER COAT BOOTH</td>
<td>EU-21</td>
<td>Install - Plant 1</td>
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<td>N/A</td>
<td>POWDER COAT CURE OVEN</td>
<td>EU-22</td>
<td>Install - Plant 1</td>
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<tr>
<td>N/A</td>
<td>MAKE-UP AIR UNIT #1</td>
<td>EU-23</td>
<td>Install in West side addition</td>
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<tr>
<td>N/A</td>
<td>MAKE-UP AIR UNIT #2</td>
<td>EU-24</td>
<td>Install in West side addition</td>
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<tr>
<td>N/A</td>
<td>INFRARED SPACE HEATERS (FORMERLY PROPANE)</td>
<td>EU-25</td>
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<tr>
<td>N/A</td>
<td>BURN-OFF OVEN</td>
<td>EU-26</td>
<td>Install - Plant 1</td>
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<tr>
<td>N/A</td>
<td>ACID WIPE DOWN</td>
<td>EU-27</td>
<td></td>
<td>Discontinue</td>
</tr>
</tbody>
</table>
Mr. Dan Hoy  
Director of Facilities  
Tracker Marine - Lebanon Plant  
2500 East Kearney  
Springfield, MO 65803  

RE: New Source Review Permit - Project Number: 2013-02-021  

Dear Mr. Hoy:  

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions 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 Emily Wilbur, at the Department of Natural Resources’ 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  

Susan Heckenkamp  
New Source Review Unit Chief  

SH:ewl  
Enclosures  

c: Southwest Regional Office  
PAMS File: 2013-02-021  

Permit Number: