

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: 092020-008 Project Number: 2020-07-028
Installation Number: 105-0046

Parent Company: White River Marine Group, LLC

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:
Two new paint booths. This review was conducted in accordance with Section (5),
Missouri State Rule 10 CSR 10-6.060, and *Construction Permits Required*.

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



Director or Designee
Department of Natural Resources

September 28, 2020
Effective Date

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 Enforcement and Compliance Section of 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 Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of startup of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual startup of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's 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 source(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 using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
<http://dnr.mo.gov/regions/>

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 to 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 (3)(E). "Conditions required by permitting authority."

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

1. Superseding Condition

A. The conditions of this permit supersede the following special conditions found in previously issued construction permits issued by the Air Pollution Control Program.

- 1) Construction Permit No. 022015-004 Special Condition 3.A.2)
- 2) Construction Permit No. 022015-004 Special Condition 3.A.3)
- 3) Construction Permit No. 022015-004 Special Condition 3.A.4)
- 4) Construction Permit No. 022015-004 Special Condition 4.A.2)
- 5) Construction Permit No. 022015-004 Special Condition 4.A.3)
- 6) Construction Permit No. 022015-004 Special Condition 4.A.4)
- 7) Construction Permit No. 022015-004 Special Condition
7.A.Table 1: Maximum Permitted Material Contents (lb/gal) Material
EP-10(3)A-1 PPG Touchup Paints – all colors
- 8) Construction Permit No. 022015-004 Special Condition
7.A.Table 1: Maximum Permitted Material Contents (lb/gal) Material
EP-10(3)A-2 Pewter wash Primer Base
- 9) Construction Permit No. 022015-004 Special Condition
7.A.Table 1: Maximum Permitted Material Contents (lb/gal) Material
EP-10(3)B Camouflage Paints (Mud Brown, Marsh Grass, &
Charcoal Green)
- 10) Construction Permit No. 112019-004 Special Condition 2

2. VOC Emission Limitation

A. Tracker Marine - Lebanon Plant shall emit less than 250.0 tons of VOCs in any consecutive 12-month period from the entire installation (listed in Table 1).

B. Tracker Marine - Lebanon Plant shall demonstrate compliance with Special Condition 2.A using Attachment A or an equivalent form approved by the Air Pollution Control Program.

3. Control Device Requirements – Dust Collectors and/or Filters

A. Tracker Marine – Lebanon Plant shall control particulate emissions from the following emission sources using dust collectors and/or filters as specified in the permit application:

- 1) EP-10(3)B Paint Booth #3 – Camouflage

SPECIAL CONDITIONS:

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

- 2) EP-10(3)A-2 Paint Booth #3 - Primer
 - 3) EP-31 Polyurea Booth
- B. The dust collectors and filters shall be operated and maintained in accordance with the manufacturer's specifications. The dust collectors and filters shall be equipped with gauges or meters, which indicates the pressure drop across the control devices. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.
- 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).
- D. Tracker Marine – Lebanon Plant shall monitor and record the operating pressure drop across the dust collectors and filters at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
- E. Tracker Marine – Lebanon Plant shall maintain a copy of the manufacturer's performance warranty for the dust collectors and filters on site.
- F. Tracker Marine – Lebanon Plant shall maintain an operating and maintenance log for the dust collectors and filters 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. Capture Device Requirement – EP-10(3)A-2C, EP-10(3)B and EP-31
- A. Tracker Marine – Lebanon Plant shall use booths to capture emissions from the coating activities EP-10(3)A-2C, EP-10(3)B and EP-31).
- B. All doors and windows shall be closed.
- C. All fresh-air vents shall be equipped with a visual indicator, such as streamers, that show air flow into the booth.
5. Operational Requirement – Liquid Paints/Solvents/Adhesives
- A. Tracker Marine – Lebanon Plant shall keep all liquid paints, solvents, and adhesives in closed containers whenever the materials are not in use.

SPECIAL CONDITIONS:

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

- B. Tracker Marine – Lebanon Plant shall provide and maintain suitable, easily read, permanent markings on all liquid paint, solvent, and adhesive containers used at the installation.
6. Use of Alternative Coating
- A. Tracker Marine - Lebanon Plant may use alternative coatings others than those in the original application and this amendment.
 - B. The limits established by Special Condition 2 shall include emissions from the use of any alternative materials. Their emissions shall be accounted for in the recordkeeping associated with this limit.
 - C. Tracker Marine - Lebanon Plant shall maintain a copy of the alternative material's information and other documentation used to estimate the emissions. The highest VOC concentrations listed on the material's respective tech data/safety data sheets or from manufacturer shall be used to calculate and track emissions from the alternative materials.
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 SDS for all materials used.
 - B. Tracker Marine - Lebanon Plant shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2020-07-028
Installation ID Number: 105-0046
Permit Number: 092020-008

Installation Address:

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

Parent Company:

White River Marine Group, LLC
2500 East Kearney
Springfield, MO 65803

Laclede County, S14, T34N, R16W

REVIEW SUMMARY

- Tracker Marine - Lebanon Plant has applied for authority to install two new paint booths and associated natural gas combustion sources.
- The application was deemed complete on July 20, 2020.
- HAP emissions are expected from the proposed equipment. HAP emissions will result from the combustion of natural gas and the materials used in the paint booths.
- 40 CFR Part 63, Subpart VVVV – *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing* is applicable to the installation.
- 40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
- Dust collectors are being used to control particulate emissions from EP-10(3)A-1, EP-10(3)A-2, EP-10(3)B, and EP-31. Special Condition 3 is a federally enforceable condition requiring the use of the dust collectors and filters.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential HAP emissions are above the de minimis level. A major HAP review is not required since the emission units are subject to MACT VVVV.
- This installation is located in Laclede County, an attainment/unclassifiable 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. Although potential HAP emissions exceed the de minimis level (major source level), modeling was not performed. The paint booths are subject to MACT VVVV. EPA completed this MACT's risk and technology review (RTR). Therefore, the Air Pollution Control Program did not conduct additional risk assessment modeling.
- Emissions testing is not required for the equipment as a part of this permit. Testing may be required as part of other state, federal or applicable rules.
- Submittal of an update to your Part 70 Operating Permit is required within 1 year of the issuance date of this permit.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Tracker Marine operates an aluminum boat manufacturing installation in Lebanon, Missouri. Raw materials are brought in, cut to appropriate size, and welded together. The boats are then painted and transferred to ovens to allow the paint to cure. Additional materials are added to the craft, including floatation foam for buoyancy, various pumps, and other assorted watercraft necessities. The boat interior is sprayed with adhesive and then covered with carpeting. Finally, the entire boat is assembled, including the attachment of the engine and fuel tanks. Table 1 provides a list of installation emission units.

Table 1: Installation Emission Units

Emission Unit	Description	Maximum Design Rate
EP-01A	Gluing operations (assembly line)	2.655 gal/hr = 9 boats/hr
EP-01B	Gluing operations (HEPA filter)	1.85 gal/hr = 9 boats/hr
EP-06A	Gasoline storage tank (working loss)	24.375 gal/hr
EP-06B	Gasoline storage tank (breathing loss)	2,000 gal capacity
EP-07A	Diesel storage tank (working loss)	3.375 gal/hr
EP-07B	Diesel storage tank (breathing loss)	2,000 gal capacity
EP-08A	Welding (wire usage)	12.5 lb/hr
EP-08B	Welding (rod usage)	15.24 lb/hr
EP-09	Plywood cutting	15.24 ton/hr
EP-10(3)A-2	Paint booth #3 (primer)	0.01 gal/hr
EP-10(3)B	Paint booth #3 (camouflage)	0.85 gal/hr = 1 boat/hr
EP-11(1)	Plasma cutter (875.2 in/boat)	25,800 in/hr = 3 boats/hr
EP-11(2)	Plasma cutter (6,255.2 in/boat)	14,056 in/hr = 2 boats/hr
EP-11(3)	Plasma cutter (3,700 in/boat)	7,400 in/hr = 2 boats/hr
EP-11(5)	Plasma cutter (2,400 in/boat)	7,200 in/hr = 3 boats/hr

Emission Unit	Description	Maximum Design Rate
EP-11(6)	Plasma cutter (3,700 in/boat)	11,100 in/hr = 3 boats/hr
EP-13A	Floataction foaming (blowing agent)	4.23 gal/hr = 9 boats/hr
EP-13B	Floataction foaming (floatation foam)	74.25 gal/hr = 9 boats/hr
EP-13C	Floataction foaming (Touch 'n Foam)	0.33 gal/hr = 9 boats/hr
EP-14	Pontoon boat touch-up spray painting	0.14 gal/hr = 1.2 12oz cans/hr
EP-15	Acid wash system	4 MMBtu/hr natural gas
EP-16	Dry-off oven	1.6 MMBtu/hr natural gas
EP-17	Powder coat booth #1	0.075 ton/hr
EP-18	Infrared oven #1	0.72 MMBtu/hr natural gas
EP-19	Powder coat booth #2	0.075 ton/hr
EP-20	Infrared oven #2	0.72 MMBtu/hr natural gas
EP-21	Clear powder coat booth	0.075 ton/hr
EP-22	Powder coat cure oven	3.2 MMBtu/hr natural gas
EP-23	Make-up air units (6)	(2) 3.3 MMBtu/hr natural gas (2) 2.5 MMBtu/hr natural gas (1) 1.512 MMBtu/hr natural gas (1) 1.296 MMBtu/hr natural gas
EP-25	Infrared space heaters	4.85 MMBtu/hr natural gas
EP-26	Burn-off oven	0.875 MMBtu/hr natural gas
EP-28	Convection oven	2.4 MMBtu/hr natural gas
EP-29	Toluene cleaner	0.275 gal/hr
EP-30B	Camouflage paint booth #1	1 gal/hr = 1 boat/hr
EP-30C	Camouflage paint booth #2	1 gal/hr = 1 boat/hr
EP-30D	Camouflage paint booth #3	1 gal/hr = 1 boat/hr
EP-30E	Touch Up Paint Booth	0.025 gal/hr
EP-31	Polyurea coating booth	2.75 gal/hr = 1 boat/hr
EP-32	In-Line Liquid Touchup Paints	0.15 gal/hr
N/A	Haul roads	N/D

Tracker Marine – Lebanon Plant is a synthetic minor NSR source for VOCs and a major source for HAPs. The installation has a Part 70 Operating Permit (OP2018-101). The following New Source Review permits have been issued to Tracker Marine - Lebanon Plant from the Air Pollution Control Program.

Table 2: Permit History

Permit Number	Description
0497-017	Installation of an aluminum boat manufacturing facility
0599-005	Installation of a new paint booth
042001-007	Modification of 0497-017 for an increase in VOC emissions
072003-017	Installation of a new paint booth
022009-003	Installation of a new paint booth and heat treat oven
082009-006	Installation of two new paint booths and plasma cutters
082009-006A	Emission point notation correction
022009-003A	Emission point notation correction
052013-001	Installation of a powder coat system, router, burn off oven, and other equipment

Permit Number	Description
022015-004	Installation of various new equipment and increase production by 25%
122016-008	Installation of three new paint booths
112019-004	Gasoline usage

PROJECT DESCRIPTION

Tracker Marine – Lebanon Plant plans to make changes to the aluminum boat product lines produced on site. In order to accommodate and optimize the planned changes to aluminum boat models produced, Tracker Marine – Lebanon Plant plans to modify existing air emission units and add new air emission units.

Tracker Marine – Lebanon Plant plans to dismantle the spray booth and drying oven that service the Camouflage Paint, Primer, and Touchup Paint coating operations in Plant II (EP-10(3)A-1, EP-10(3)A-2, EP-10(3)8, and EP-12(3)). Tracker Marine – Lebanon Plant plans to construct a new spray booth and new heated air make-up unit in Plant I to support EP-10(3) operations. Tracker Marine – Lebanon Plant has requested the new booth use the designation of the units being replaced (EP-10(3)A-2, and EP-10(3)B). The touchup paint has been designated EP-32. The MHDR of the new spray booth will remain the same as the one being dismantled. The planned modifications will introduce alternate coating materials for EP-10(3) other than the approved materials listed in Special Condition 7.A of Construction Permit No. 022015-004. The use of a new coatings is considered a modification and a change in the method of operation. The new booth will not be considered a like-kind replacement because potential particulate and HAP emissions increase as a result of the change.

The new heated air makeup unit associated with EP-10(3) will be natural gas fired with a rated heat input of 1.512 MMBtu/hr. Tracker Marine – Lebanon Plant requested to include this with existing emission unit designation EP-23 Make-up Air Units. However, its emissions are included as a part of this project's total potential emissions.

Tracker Marine – Lebanon Plant also plans to construct a second new spray booth (EP-31) and heated air make-up unit in Plant I to support a planned new coating operation. This planned new operation will utilize a two-part polyurea coating system referred to by the Facility as "Road Armor" to coat aluminum boats.

The new heated air makeup unit to support EP-31 will be natural gas fired with a rated heat input of 1.296 MMBtu/hr. Tracker Marine – Lebanon Plant requested to also include this unit with existing emission unit EP-23 Make-up Air Units.

Uncontrolled emissions from the project are above insignificant emission levels. Special Condition 3 of this permit requires fabric filters for the new booths. Potential VOC emissions from the modified installation are limited to 250.0 tpy by Special Condition 2 to retain synthetic minor construction permit status. Special Condition 1 removes

operational limitations for gallons per year associated with EP-10(3) that were established in Construction Permit No. 022015-004. Due to the retention of other limits in that permit, other emissions will remain below de minimis levels. Construction Permit No. 0220015-004 restricted gallons per year to keep individual HAP emissions below their respective SMALs, as well as to help keep installation-wide VOC emissions below the major source levels. Since the completion of Construction Permit No. 022015-004, EPA has completed this MACT's risk and technology review (RTR). Therefore, the Air Pollution Control Program would not conduct additional risk assessment modeling for exceeding the SMAL when using alternative materials in the booth.

EMISSIONS/CONTROLS EVALUATION

Emissions from EP-32, EP-10(3)B, EP-10(3)A-2, and EP-31 were evaluated using a mass balance approach, assuming 100 percent emission of volatiles. A transfer efficiency of 65% was applied to EP-10(3)A-1, EP-10(3)B, EP-10(3)A-2, and EP-31. A particulate control efficiency of 95% was included in emission calculations for EP-10(3)B, EP-10(3)A-2 and EP-31 from the use of filters required by Special Condition 3.

MDI emissions from EP-31 were calculated using an equation for spray coating operations from *The Alliance of the Polyurethanes Industry* document "MDI/Polymeric MDI Emissions Reporting Guidelines For the Polyurethane Industry".

Emissions from the combustion of natural gas in EP-23 were calculated using emission factors obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4 "Natural Gas Combustion" (July 1998).

The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit 112019-004. Existing actual emissions were taken from the installation's 2019 EIQ. Potential emissions of the application represent the potential of the modified installation, assuming continuous operation (8,760 hours per year).

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2019 EIQ)	Potential Emissions of the Project
PM	25.0	N/D	N/D	3.40
PM ₁₀	15.0	31.21	3.39	3.47
PM _{2.5}	10.0	N/D	3.39	3.47
SO _x	40.0	0.06	N/D	0.01
NO _x	40.0	29.00	1.49	1.20
VOC	40.0	<250.0	81.21	<250.0
CO	100.0	N/D	1.26	1.00
Total HAPs	25.0	>25.0	N/D	14.32
Ethylbenzene	10.0	N/D	N/D	2.39

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2019 EIQ)	Potential Emissions of the Project
Toluene	10.0	N/D	N/D	0.40
Xylene	10.0	N/D	N/D	12.04

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

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential HAP emissions are above the de minimis level. A major HAP review is not required since the emission units are subject to MACT VVVV.

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

- *Operating Permits*, 10 CSR 10-6.065
- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
 - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required every year for Part 70 installations.
- *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

- *10 CSR 10-6.075 Maximum Achievable Control Technology Regulations*
 - *40 CFR Part 63, Subpart VVVV – National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*
 - *40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated July 10, 2020, received July 20, 2020, designating White River Marine Group, LLC as the owner and operator of the installation.
- The Alliance of the Polyurethanes Industry document "MDI/Polymeric MDI Emissions Reporting Guidelines For the Polyurethane Industry".

ATTACHMENT A VOC Compliance Worksheet

Tracker Marine – Lebanon Plant
Laclede County S14, T34N, R16W
Installation ID Number: 105-0046

Project Number: 2020-07-028
Permit Number: 092020-008

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

Combustion Emissions			
Emission Source	Monthly Usage (MMscf)	Emission Factor (lb/MMscf)	Emissions ¹ (tons/month)
EP-12(3) Drying Oven for Paint Booth #3		5.50	
EP-15 Acid Wash System		5.50	
EP-16 Dry-Off Oven		5.50	
EP-18 Infrared Oven #1		5.50	
EP-20 Infrared Oven #2		5.50	
EP-22 Powder Coat Cure Oven		5.50	
EP-23 Make-up Air Units		5.50	
EP-25 Infrared Space Heaters		5.50	
EP-26 Burn-Off Oven		5.50	
EP-28 Convection Oven		5.50	
Paint, Solvent, Adhesive, and Foam Emissions			
Material	Monthly Usage (gal)	Emission Factor (lb/gal)	Emissions ¹ (tons/month)
VA 332 Adhesive (EP-01A & EP-01B)		4.10	
#348 Waterbase Adhesive (EP-01A)		4.05	
PPG Touchup Paints – all colors (EP-32)		5.53	
Touchup Paint – clear (EP-32)		4.41	
No-Glare Charcoal Green Camo (EP-10(3)B)		4.78	
No-Glare Marsh Grass Camo (EP-10(3)B)		4.80	
No-Glare Mud Brown Camo (EP-10(3)B)		4.80	
Pewter Wash Primer Base (EP-10(3)A-2)		5.94	
Ecomate Blowing Agent (EP-13A)		0.73	
Touch 'n Foam (EP-13C)		1.44	
177885 Anodized Aluminum (EP-14)		5.07	
Toluene (EP-29)		7.26	
No-Glare Charcoal Green Camo (EP-30B-E)		4.95	
No-Glare Marsh Grass Camo (EP-30B-E)		4.92	
No-Glare Mud Brown Camo (EP-30B-E)		4.96	
Primer, Tan Epoxy, PT A 18201 (EP-10(3)B)		5.79	
Ura-Zen Catalyst, Part B (EP-10(3)B)		2.52	
Custom-Pak Forest Green (EP-10(3)B)		4.68	
Sand Wht Gloss AQ (EP-10(3)B)		1.92	
San Aqua-Zen (EP-10(3)B)		2.03	
Olive Drb Aqua-Zen (EP-10(3)B)		1.91	
Mud Brwn Aqua-Zen (EP-10(3)B)		1.95	
Light Gray Aqua-Zen (EP-10(3)B)		1.97	
Fall Brwn Aqua-Zen (EP-10(3)B)		1.87	
Gen Metal Drab Aqua-Zen (EP-10(3)B)		1.97	
Flt BLK Aqua-Zen (EP-10(3)B)		2.33	
Alternative Coating ⁴ (EP-1, EP-10, EP-13, EP-14, EP-29, EP-30, EP-31, EP-32)			

ATTACHMENT A
VOC Compliance Worksheet

Alternative Coating ⁴ (EP-1, EP-10, EP-13, EP-14, EP-29, EP-30, EP-31, EP-32)			
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Alternative Coating ⁴ (EP-1, EP-10, EP-13, EP-14, EP-29, EP-30, EP-31, EP-32)			
Tank Emissions			
Emission Source	Monthly Usage (Mgal)	Emission Factor (lb/Mgal)	Emissions¹ (tons/month)
EP-06A Gasoline Storage Tank – Working Losses		10.00	
EP-07A Diesel Storage Tank – Working Losses		0.02	
EP-06B Gasoline Storage Tank – Breathing Losses	-	-	4.17×10 ⁻⁴
EP-07B Diesel Storage Tank – Breathing Losses			
Monthly Total Installation Emissions² (tons/month):			
12-Month Rolling Total Installation Emissions³ (tons/year):			

¹Calculate by multiplying the monthly usage by the emission factor and dividing by 2,000

²Calculate by adding together the monthly emissions of all above sections

³Calculate by adding the monthly total installation emissions of the most recent 12 month period

A 12-month rolling total of less than 250.0 tons of VOCs indicates compliance with Special Condition 2

⁴Emission factors for alternative coatings shall be determined from the coating SDS. If a range is given, the highest value shall be used. VOC emission factor (lb/gal) = Density (lb/gal) x (VOC content)

APPENDIX A

Abbreviations and Acronyms

% percent	Mgal 1,000 gallons
°F degrees Fahrenheit	MW megawatt
acfm actual cubic feet per minute	MHDR maximum hourly design rate
BACT Best Available Control Technology	MMBtu Million British thermal units
BMPs Best Management Practices	MMCF million cubic feet
Btu British thermal unit	MSDS Material Safety Data Sheet
CAM Compliance Assurance Monitoring	NAAQS National Ambient Air Quality Standards
CAS Chemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMS Continuous Emission Monitor System	NO_xnitrogen oxides
CFR Code of Federal Regulations	NSPS New Source Performance Standards
CO carbon monoxide	NSR New Source Review
CO₂ carbon dioxide	PMparticulate matter
CO_{2e} carbon dioxide equivalent	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
COMS Continuous Opacity Monitoring System	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
CSR Code of State Regulations	ppm parts per million
dscf dry standard cubic feet	PSD Prevention of Significant Deterioration
EIQ Emission Inventory Questionnaire	PTE potential to emit
EP Emission Point	RACT Reasonable Available Control Technology
EPA Environmental Protection Agency	RAL Risk Assessment Level
EU Emission Unit	SCC Source Classification Code
fps feet per second	scfm standard cubic feet per minute
ft feet	SDS Safety Data Sheet
GACT Generally Available Control Technology	SIC Standard Industrial Classification
GHG Greenhouse Gas	SIP State Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
gr grains	SO_x sulfur oxides
GWP Global Warming Potential	SO₂ sulfur dioxide
HAP Hazardous Air Pollutant	SSM Startup, Shutdown & Malfunction
hr hour	tph tons per hour
hp horsepower	tpy tons per year
lb pound	VMT vehicle miles traveled
lbs/hr pounds per hour	VOC Volatile Organic Compound
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

September 28, 2020

Blake Pruitt
EHS Manager - White River Marine Group
Tracker Marine - Lebanon Plant
PO Box 179, 927 Highway 178 North
Flippin, AR 72634

RE: New Source Review Permit - Project Number: 2020-07-028

Dear Blake Pruitt:

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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.



Blake Pruitt
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If you have any questions regarding this permit, please do not hesitate to contact Chad Stephenson, 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

A handwritten signature in blue ink, appearing to read 'S. Heckenkamp', written in a cursive style.

Susan Heckenkamp
New Source Review Unit Chief

SH:sca

Enclosures

c: Southwest Regional Office
PAMS File: 2020-07-028

Permit Number: 092020-008