



Missouri Department of Natural Resources
Air Pollution Control Program

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: OP2010-119A
Expiration Date: December 26, 2015
Installation ID: 105-0046
Project Number: 2012-04-065

Installation Name and Address

Tracker Marine-Lebanon
P.O. Box 552
Lebanon, MO 65536
Laclede County

Parent Company's Name and Address

Tracker Marine, LP
2500 East Kearney
Springfield, MO 65803

Installation Description:

Tracker Marine manufactures aluminum boats. Raw materials are received, 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 transferred to drying ovens. After drying, glue is sprayed and carpet is installed. Finally, the entire boat is assembled, including attaching the engine and fuel tanks to the main assembly. The final product is taken to an on-site storage yard to await shipping to customers.

This permit has been amended to include emission points that were omitted from the original permit.

MAR 27 2013

Effective Date


Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	4
EMISSION UNITS WITHOUT LIMITATIONS	4
II. PLANT WIDE EMISSION LIMITATIONS.....	6
PERMIT CONDITION PW001	6
10 CSR 10-6.060 Construction Permits Required.....	6
Construction Permit 082009-006, Issued August 19, 2009.....	6
PERMIT CONDITION PW002	7
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations and.....	7
40 CFR Part 63, Subpart A General Provisions and Subpart VVVV National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing	7
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	16
EU0010 –GLUING APPLICATION	16
PERMIT CONDITION EU0010-001	16
10 CSR 10-6.400, Control of Emission of Particulate Matter From Industrial Processes	16
EU0020 THROUGH EU0060 PRODUCTION EQUIPMENT	17
PERMIT CONDITION EU0010-002, and (EU0020 through EU0050)-001.....	17
10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants.....	17
PERMIT CONDITION EU0035-002 and EU0060-001	17
10 CSR 10-6.060 Construction Permits Required.....	17
Construction Permit 0599-005, Issued April 19, 1999.....	17
IV. CORE PERMIT REQUIREMENTS	19
V. GENERAL PERMIT REQUIREMENTS.....	28
VI. ATTACHMENTS	34
ATTACHMENT A	35
ATTACHMENT B	36
ATTACHMENT C	37
ATTACHMENT D	38
ATTACHMENT E	39
ATTACHMENT F.....	40
ATTACHMENT G	41
ATTACHMENT H.....	42
ATTACHMENT I.....	43
ATTACHMENT J	44
ATTACHMENT K.....	45
ATTACHMENT L	46

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Tracker Marine manufactures aluminum boats. Raw materials are received, 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 transferred to drying ovens. After drying, glue is sprayed and carpet is installed. Finally, the entire boat is assembled, including attaching the engine and fuel tanks to the main assembly. The final product is taken to an on-site storage yard to await shipping to customers.

This permit has been amended to include emission point EP-10 [Seg. 2], a paint booth which was not included in the original operating permit (OP2010-119); to add emission points EP-10A [Seg. 1], EP-10A [Seg. 2], and EP-10A [Seg. 3] in order to clarify that each paint booth has associated solvent wipe down emissions, and to correct a typographical error and clarify that there are drying ovens associated with each paint booth, EP-12 [Seg. 1], EP-12 [Seg. 2], EP-12 [Seg. 3], and EP-12 [Seg. 4]. This amendment also incorporates the gasoline and diesel storage tanks (EP-06 and 07, respectively) and two new plasma cutters (EP-11 [Seg. 3] and EP-11 [Seg. 4]) into the permit. Additionally, the Statement of Basis includes permit amendments 022009-003A, 082009-006A, 082009-006B, and no permit required determination #2011-04-042.

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)*
2008	26.25	0.04	0.0001	1.35	28.72	0.23	0	14.4
2007	0.50	0.00	0.00	0.00	62.47	0.00	0.00	11.9
2006	12.68	0.03	0.0001	4.4	56.53	0.19	0	7.2
2005	7.98	0.03	0.0001	0.93	33.65	0.16	0	13.9
2004	0.45	0.21	0.0001	1.17	33.41	0.20	0	18.3

*The installation has reported HAPs as either PM₁₀, or VOC, in accordance with 10 CSR 10-6.110. The HAPs reported were:

Emission Point	HAP NAME	Emission Year (Emissions reported in Pounds)				
		2004	2005	2006	2007	2008
EP-01	Ethylbenzene					0.74
	Isomers of xylene					0.62
	Methyl alcohol					0.08
	Methylene(B)4-phenylisocyanate					21.34
	N-Hexane					14.96
	Vinyl acetate					32.78
EP-03	Toluene	6216.39	4861.2	5484.05	6847.35	16620.06
EP-03A	Toluene	4144.26	3240.8	2194.02	2738.94	6648
EP-04	Ethylbenzene				378.42	414.04
	Isomers of xylene	15855.84	13584	4696	5631.33	3751
	Methyl isobutyl ketone	3094.41	2112	2076	1261.4	1380.12
	Toluene	7297.77	4044	3.72	6847.35	
EP-10	Isomers of xylene	0				
	Methyl ethyl ketone	0				
	Methyl isobutyl ketone	0				
	Toluene	0				
EP-10A	Toluene	0				
Yearly Total=		36608.67	27842	14453.79	23704.79	28883.74

EMISSION UNITS WITH 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>
EU0010	Gluing Application (EP-01)
EU0020	Wood Cutting (EP-09)
EU0030	Paint Booth (EP-10[Seg.1])
EU0035	Paint Booth (EP-10 [Seg. 2])
EU0040	Paint Booth (EP-10[Seg. 3])
EU0050	Paint Booth (EP-10[Seg. 4])
EU0060	Solvent Wipe Down (EP-10A[Seg. 2])

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<u>Description of Emission Source</u>
Solvent Wipe-down, EP-03, EP-10A, EP-10A [Seg. 1], EP-10A [Seg. 3], EP-10A[Seg. 4]
Space Heating, EP-05; uses LPG or propane
Welding, EP-08A and B
Drying Ovens EP-12[Seg. 1], EP-12[Seg. 2], EP-12[Seg. 3] and EP12[Seg. 4]; 1.5 MMBtu/hr each, uses LPG or natural gas
Plasma Cutters EP-11[Seg. 1], EP-11[Seg. 2], EP-11 [Seg. 3] , and EP-11 [Seg. 4]
Gasoline Storage Tank, 300 gallon capacity, EP-06

Diesel Storage Tank, 300 gallon capacity, EP-07

Log cutting, EP-09

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

1. Construction Permit 022009-003
2. Construction Permit 082009-006
3. Construction Permit 0599-005

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 022009-003, Issued February 2, 2009 and
Construction Permit 082009-006, Issued August 19, 2009

Emission Limitation:

1. The permittee shall emit less than 250.0 tons of VOC from the installation in any consecutive twelve-month period. This limit applies to the VOC emissions from all equipment and processes installed or permitted at the installation as of the issuance date of this construction permit. [Special Condition 2A.]
2. Alternative Coatings in Paint Booths EP-10[Seg.1], EP-10[Seg.3] and EP-10[Seg.4]: [Special Condition 3]
 - (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, the permittee shall calculate the potential emissions of volatile organic compounds (VOCs) in the alternative material. [Special Condition 3(A)]
 - (b) The permittee shall seek approval from the Air Pollution Control Program before use of the alternative material in the following cases: [Special Condition 3(B)]
 - (i) 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. [Special Condition 3(b)(i)]
 - (ii) 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. [Special Condition 3(b)(ii)]
 - (iii) 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. [Special Condition 3(b)(iii)]

Operational Limitation:

1. The permittee shall keep the solvent and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used. [Special Condition 5]
2. When either paint booths (EP-10[Seg.3]) or (EP-10[Seg.4]) is operating, the permittee shall control particulate matter less than ten microns in diameter (PM₁₀) using the following filters as specified in the permit application. The filters shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 4]
 - (a) MAT filter (C-1G), fabric filter (C-1H) and fiberglass filter (C-1I) for EP-10[Seg.3]
 - (b) MAT filter (C-1J), fabric filter (C-1K) and fiberglass filter (C-1L) for EP-10[Seg.4]

3. The permittee 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 construction permit application. The filters shall be operated and maintained in accordance with manufacturer's specifications. [Construction Permit 022009-003, Special Condition 4]

Monitoring:

The permittee shall monitor the plant wide VOC emissions and the types of coatings used.

Recordkeeping:

1. The permittee shall record the monthly and consecutive twelve-month VOC emissions. Attachment E or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance. The permittee shall maintain all records 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 Material Data Safety Sheets (MSDS) for all materials used in conjunction with all emission points. [Special Condition 2.B]
2. Attachment F or an equivalent form shall be used to show compliance with Emission Limitation 2.(a) and (b). The permittee 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. [Special Condition 3C]

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the records indicate that the source exceeds the emission limitation. [Special Condition 2.C]
2. 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 Section IV of this permit.

PERMIT CONDITION PW002

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

Emission Limitations:

1. Carpet and fabric adhesives
 - (a) You must use carpet and fabric adhesives that contain no more than five percent organic HAP by weight. [§63.5740(a)]
 - (b) To demonstrate compliance with the emission limit in §63.5740(a), 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)]
2. Aluminum Recreational Boat Surface Coating Operations
 - (a) For aluminum wipedown solvent operations and aluminum surface coating operations, the permittee must comply with either the separate emission limits in §63.5743(a)(1) and (2), or the

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

Compliance Demonstration for aluminum wipedown solvents and aluminum coatings:

1. The permittee shall determine and record the organic HAP content (kilograms of organic HAP per kilogram of material, or weight fraction) of each aluminum wipedown solvent and aluminum coating (including primers, topcoats, clear coats, thinners, and activators). Use the methods in §63.5758 to determine organic HAP content. [§63.5746(a)]
2. The permittee shall use the methods in §63.5758(b) to determine the solids content (liters of solids per liter of coating, or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats. Keep records of the solids content. [§63.5746(b)]
3. The permittee shall use the methods in §63.5758(c) to determine the density of each aluminum surface coating and wipedown solvent. [§63.5746(c)]
4. Compliance is based on a twelve-month rolling average calculated at the end of every month. The first twelve-month rolling-average period begins on the compliance date specified in §63.5695. [§63.5746(d)]
5. At the end of the twelfth month after the compliance date and at the end of every subsequent month, use the procedures in §63.5749 to calculate the organic HAP from aluminum wipedown solvents per liter of coating solids, and use the procedures in §63.5752 to calculate the kilograms of organic HAP from aluminum coatings per liter of coating solids. [§63.5746(e)]
6. The permittee shall keep records of the calculations used to determine compliance. [§63.5746(f)]

7. Approval of alternative means of demonstrating compliance. The permittee may apply to the Administrator for permission to use an alternative means (such as an add-on control system) of limiting emissions from aluminum wipedown solvent and coating operations and demonstrating compliance with the emission limits in §63.5743(a). [§63.5746(g)]
- (a) The application must include the information listed in §63.5746(g)(1)(i) through (iii). [§63.5746(g)(1)]
- (i) An engineering evaluation that compares the emissions using the alternative means to the emissions that would result from using the strategy specified in §63.5746(a) through (e). The engineering evaluation may include the results from an emission test that accurately measures the capture efficiency and control device efficiency achieved by the control system and the composition of the associated coatings so that the emissions comparison can be made. [§63.5746(g)(1)(i)]
- (ii) A proposed monitoring protocol that includes operating parameter values to be monitored for compliance and an explanation of how the operating parameter values will be established through a performance test. [§63.5746(g)(1)(ii)]
- (iii) Details of appropriate recordkeeping and reporting procedures. [§63.5746(g)(1)(iii)]
- (b) The Administrator will approve the alternative means of limiting emissions if the Administrator determines that HAP emissions will be no greater than if the source uses the procedures described in §63.5746(a) through (e) to demonstrate compliance. [§63.5746(g)(2)]
- (c) The Administrator's approval may specify operation, maintenance, and monitoring requirements to ensure that emissions from the regulated operations are no greater than those that would otherwise result from regulated operations in compliance with this subpart. [§63.5746(g)(3)]

Calculating organic HAP content:

1. Aluminum wipedown solvents

- (a) The permittee shall use the following equation to calculate the weighted-average organic HAP content of aluminum wipedown solvents used in the past twelve months. [§63.5749(a)]

$$HAP_{WD} = \frac{\sum_{j=1}^n (Vol_j)(D_j)(W_j)}{\sum_{i=1}^n (VOL_i)(Solids_i)}$$

Where:

HAP_{WD} = weighted-average organic HAP content of aluminum wipedown solvents, kilograms of

HAP per liter of total coating solids from aluminum primers, top coats, and clear coats.

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

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

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

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

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

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

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

- (b) Compliance is based on a twelve-month rolling average. If the weighted-average organic HAP content does not exceed 0.33 kilograms of organic HAP per liter of total coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(1). [§63.5749(b)]

2. Aluminum recreational boat surface coatings

- (a) The permittee shall use the following equation to calculate the weighted-average HAP content for all aluminum surface coatings used in the past twelve months. [§63.5752(a)]

$$HAP_{SC} = \frac{\sum_{i=1}^m (VOL_i)(D_i)(W_i) + \sum_{k=1}^D (VOL_k)(D_k)(W_k)}{\sum_{i=1}^m (VOL_i)(Solids_i)}$$

Where:

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

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

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

D_i = density of coating i, kilograms per liter.

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

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

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

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

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

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

- (b) Compliance is based on a twelve-month rolling average. If the weighted-average organic HAP content does not exceed 1.22 kilograms of organic HAP per liter of coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(2). [§63.5752(b)]

3. Combination of aluminum_wipedown solvents and aluminum recreational boat surface coatings:

- (a) The permittee shall use the following equation to calculate the combined weighted-average organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings. [§63.5753(a)]

$$HAP_{Combined} = HAP_{WD} + HAP_{SC}$$

Where:

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

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

- (b) Compliance is based on a twelve-month rolling average. If the combined organic HAP content does not exceed 1.55 kilograms of organic HAP per liter of total coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(3). [§63.5753(b)]

Demonstrating Compliance with the aluminum recreational boat surface coating spray gun cleaning work practice standards:

1. The permittee must demonstrate compliance with the aluminum coating spray gun cleaning work practice standards by meeting the requirements of §63.5755(a) or (b).
 - (a) The permittee must demonstrate that solvents used to clean the aluminum coating spray guns contain no more than five percent organic HAP by weight by determining organic HAP content with the methods in §63.5758. Keep records of the organic HAP content determination. [§63.5755(a)]
 - (b) For solvents containing more than five percent organic HAP by weight, the permittee shall comply with the requirements in §63.5755(b)(1) or (b)(2), and §63.5755(b)(3). [§63.5755(b)]
 - (i) If you are using an enclosed spray gun cleaner, the permittee shall visually inspect it at least once per month to ensure that covers are in place and the covers have no visible gaps when the cleaner is not in use, and that there are no leaks from hoses or fittings. [§63.5755(b)(1)]
 - (ii) If you are manually cleaning the gun or spraying solvent into a container that can be closed, the permittee shall visually inspect all solvent containers at least once per month to ensure that the containers have covers and the covers fit with no visible gaps. [§63.5755(b)(2)]
 - (iii) The permittee shall keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers. [§63.5755(b)(3)]

Methods for Determining Hazardous Air Pollutant Content of materials:

1. To determine the organic HAP content for each material used in the carpet and fabric adhesive operations or aluminum recreational boat surface coating operations, the permittee must use one of the options in §63.5758(a)(1) through (6). [§63.5758(a)]
 - (a) The permittee may use Method 311 (appendix A to 40 CFR Part 63) for determining the mass fraction of organic HAP. Use the procedures specified in §63.57578(a)(1)(i) and (ii) when determining organic HAP content by Method 311. [§63.5758(a)(1)]
 - (i) The permittee shall 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, you do not 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)]

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- (ii) The permittee shall 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) The permittee may use Method 24 (appendix A to 40 CFR Part 60) 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) The permittee may use an alternative test method for determining mass fraction of organic HAP if the permittee obtains 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)]
 - (d) The permittee may rely on information other than that generated by the test methods specified in §63.5758(a)(1) through (4), such as manufacturer's formulation data, according to §63.5758(a)(5)(i) through (iii). [§63.5758(a)(5)]
 - (i) The permittee shall 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, you do not have to include it in the organic HAP total. [§63.5758(a)(5)(i)]
 - (ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then 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 §63.5758(a)(1) through (4) exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then 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 §63.5758(a)(1) through (4) 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 the permittee must use the measured organic HAP content to determine compliance. [§63.5758(a)(5)(iii)]
 - (e) Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in Table 5 or 6 to this subpart (See Attachments G and H). You 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. 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 §63.5758(b)(1) through (3). If the results obtained with §63.5758(b)(2) or (3) do not to

agree with those obtained according to §63.5758(b)(1), the permittee must use the results obtained with §63.5758(b)(1) to determine compliance. [§63.5758(b)]

- (a) 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) The permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. [§63.5758(b)(2)]
- (c) The permittee may determine it using the following equation: [§63.5758(b)(3)]

$$\text{Solids} = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}}$$

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. The permittee shall 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)]

Notifications, Reporting, and Recordkeeping

1. Notifications

- (a) The permittee must submit all of the notifications in Table 7 to this subpart (see Attachment I) that apply to you 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)]
- (b) 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)]

2. Reporting

- (a) The permittee must submit the applicable reports specified in §63.5764(b) through (e). 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. [§63.5764(a)]

- (b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report by the dates in §63.5764(b)(1) through (5). [§63.5764(b)]
 - (i) The first compliance report must cover the period beginning twelve months after the compliance date specified for your source in §63.5695 and ending on June 30 or December 31, whichever date is the first date following the end of the first twelve-month period after the compliance date that is specified for your source in §63.5695. [§63.5764(b)(1)]
 - (ii) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in §63.5764(b)(1). [§63.5764(b)(2)]
 - (iii) Each subsequent compliance report must cover the applicable semi-annual reporting period from January 1 through June 30 or from July 1 through December 31. [§63.5764(b)(3)]
 - (iv) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semi-annual reporting period. [§63.5764(b)(4)]
 - (v) The permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established for Part 70 Operating Permits instead of according to the dates in §63.5764(b)(1) through (4). [§63.5764(b)(5)]
- (c) The compliance report must include the information specified in §63.5764(c)(1) through (7). [§63.5764(c)]
 - (i) Company name and address. [§63.5764(c)(1)]
 - (ii) 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)]
 - (iii) The date of the report and the beginning and ending dates of the reporting period. [§63.5764(c)(3)]
 - (iv) A description of any changes in the manufacturing process since the last compliance report. [§63.5764(c)(4)]
 - (v) 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 twelve-month averaging periods that end during the reporting period. [§63.5764(c)(5)]
 - (vi) If you were in compliance with the emission limits and work practice standards during the reporting period, you must include a statement to that effect. [§63.5764(c)(6)]
 - (vii) If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed in §63.5764(c)(7)(i) through (iv) in the semi-annual compliance report. [§63.5764(c)(7)]
 - (1) A description of the operation involved in the deviation. [§63.5764(c)(7)(i)]
 - (2) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation. [§63.5764(c)(7)(ii)]
 - (3) A description of any corrective action you took to minimize the deviation and actions you have taken to prevent it from happening again. [§63.5764(c)(7)(iii)]
 - (4) A statement of whether or not your facility was in compliance for the twelve-month averaging period that ended at the end of the reporting period. [§63.5764(c)(7)(iv)]

3. Recordkeeping

- (a) The permittee must keep a copy of each notification and report that you submitted to comply with this subpart. [§63.5767(a)]
- (b) The permittee must keep all documentation supporting any notification or report that you submitted. [§63.5767(b)]
- (c) The permittee must keep the records specified in §63.5767(c)(1) through (3). [§63.5767(c)]
 - (i) 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)]
 - (ii) 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)]
- (d) The permittee shall make all records must be readily available and in a form so they can be easily inspected and reviewed. [§63.5770(a)]
- (e) The permittee shall keep each record for five years following the date that each record is generated. [§63.5770(b)]
- (f) The permittee shall keep each record on site for at least two years after the date that each record is generated. The permittee can keep the records offsite for the remaining three years. [§63.5770(c)]
- (g) 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)]

III. Emission Unit Specific Emission Limitations

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

EU0010 –Gluing application	
Emission Unit	Description
EU0010	Gluing Application

PERMIT CONDITION EU0010-001
10 CSR 10-6.400, Control of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

1. Particulate matter shall not be emitted from EU0010 in excess of 0.39 lb/hr.
2. The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

Monitoring:

1. Booths equipped with mat/panel filters shall not be operated without a filter in place.
2. The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
3. The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
4. The manufacturer’s recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Recordkeeping:

1. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule. (See Statement of Basis-Other Regulatory Determinations)
2. The permittee shall maintain records of the inspections of mat/panel including when they occur (See Attachment J).
3. Attachment J contains a log including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
4. These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
5. All records shall be maintained for five years.

Reporting:

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

EU0020 through EU0060 Production Equipment	
Emission Unit	Description
EU0020	Wood Cutting (EP-09)
EU0030	Paint Booth (EP-10[Seg.1]), controlled by MAT filter (C-1D), fabric filter (C-1E), and fiberglass filter (C-1F) resulting in 99% control efficiency; 75% transfer efficiency for electrostatic spray application, installed 2009
EU0035	Paint Booth #2 (EP-10 [Seg. 2]), controlled by fabric filter and bag filter, each with 99% control efficiency; 65% transfer efficiency for spray gun, installed 1984.
EU0040	Dual Paint Booth (EP-10[Seg.3]), controlled by MAT filter (C-1G), fabric filter (C-1H), and fiberglass filter (C-1I) resulting in 96% control efficiency, 65% manufacturer's transfer efficiency, installed 2009
EU0050	Single Paint Booth (EP-10[Seg.4]), controlled by MAT filter (C-1J), fabric filter (C-1K) and fiberglass filter (C-1L) resulting in a 96% control efficiency, 65% manufacturer's transfer efficiency, installed 2009
EU0060	Solvent Wipe Down (EP-10A[Seg. 2])

PERMIT CONDITION EU0010-002, and (EU0020 through EU0050)-001
 10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

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

Monitoring/Recordkeeping/ Monitoring/ Reporting:

As detailed in Core Permit Requirements.

PERMIT CONDITION EU0035-002 and EU0060-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 0599-005, Issued April 19, 1999

Emission Limitation:

The permittee shall emit into the atmosphere from the paint booth (EP-10[Seg. 2]) and toluene wipe down (EP-10A[Seg. 2]) less than ten tons of any individual HAP and less than 25 tons of aggregate HAPs in any consecutive twelve month period. (Special Condition 1)

Recordkeeping:

Records of the monthly and annual HAP emissions shall be kept on-site for the most recent 60 months. Attachments K and L, "HAP Compliance Worksheets" are suitable for this purpose. A form of the permittee's own design may be used instead of the attached form provided all the requested information

is logged. These records shall be made available immediately to the Department of Natural Resources' personnel upon verbal request. (Special Condition 2)

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of each month, if the 12-month cumulative total records show that the source exceeded the emission limitation. (Special Condition 3)
2. 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 Section IV of this permit.

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) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.;and

- (4) In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and
- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) 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.
- 4) Tracker Marine-Lebanon may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Tracker Marine-Lebanon fails to comply with the provisions or any condition of the open burning permit.
- a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61
Subpart M National Emission Standard for Asbestos**

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the Department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee 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 Inventory Questionnaire (EIQ) form or equivalent approved by the Director.
- 6) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 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.

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation. The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.

- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-3.090 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.

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

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are 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 permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.

- (2) 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.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all U.S. EPA Method 9 opacity tests performed.

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
 - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
 - 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

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:

- i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
- ii) 10 CSR 10-6.040, "Reference Methods";
- iii) 10 CSR 10-6.070, "New Source Performance Standards";
- iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
- b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice

- must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semi-annual 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 semi-annually (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's

Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:

- a) The identification of each term or condition of the permit that is the basis of the certification;
- b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

10 CSR 10-6.065(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 Operating Permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's 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), recordkeeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's 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 Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program 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 Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

- b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
- d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Larry D. Clutter, Director of EHS. On October 26, 2010, the Air Pollution Control Program was informed that Steve W. Smith, Vice President and Chief Financial Officer is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (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) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
 - or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon

approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
or

- 5) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis
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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

Attachment G

Table 5 to Subpart VVV of Part 63—Default Organic HAP Contents of Solvents and Solvent Blends

As specified in §63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent/solvent blend	CAS No.	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
1. Toluene	108-88-3	100	Toluene.
2. Xylene(s)	1330-20-7	100	Xylenes, ethylbenzene.
3. Hexane	110-54-3	50	n-hexane.
4. n-hexane	110-54-3	100	n-hexane.
5. Ethylbenzene	100-41-4	100	Ethylbenzene.
6. Aliphatic 140		0	None.
7. Aromatic 100		2	1% xylene, 1% cumene.
8. Aromatic 150		9	Naphthalene.
9. Aromatic naphtha	64742-95-6	2	1% xylene, 1% cumene.
10. Aromatic solvent	64742-94-5	10	Naphthalene.
11. Exempt mineral spirits	8032-32-4	0	None.
12. Ligroines (VM & P)	8032-32-4	0	None.
13. Lactol spirits	64742-89-6	15	Toluene.
14. Low aromatic white spirit	64742-82-1	0	None.
15. Mineral spirits	64742-88-7	1	Xylenes.
16. Hydrotreated naphtha	64742-48-9	0	None.
17. Hydrotreated light distillate	64742-47-8	0.1	Toluene.
18. Stoddard solvent	8052-41-3	1	Xylenes.
19. Super high-flash naphtha	64742-95-6	5	Xylenes.
20. Varol [®] solvent	8052-49-3	1	0.5% xylenes, 0.5% ethyl benzene.
21. VM & P naphtha	64742-89-8	6	3% toluene, 3% xylene.
22. Petroleum distillate mixture	68477-31-6	8	4% naphthalene, 4% biphenyl.

Attachment H

Table 6 to Subpart VVV of Part 63—Default Organic HAP Contents of Petroleum Solvent Groups

As specified in §63.5758(a)(6), when detailed organic HAP content data for solvent blends are not available, you may use the values in the following table:

Solvent type	Average organic HAP content, percent by mass	Typical organic HAP, percent by mass
Aliphatic (Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naptha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.)	3	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic (Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.)	6	4% Xylene, 1% Toluene, and 1% Ethylbenzene.

Attachment I

Table 7 to Subpart VVV of Part 63—Applicability and Timing of Notifications

As specified in §63.5761(a), you must submit notifications according to the following table:

If your facility—	You must submit—	By this date—
1. Is an existing source subject to this subpart	An initial notification containing the information specified in §63.9(b)(2)	No later than the dates specified in §63.9(b)(2).
2. Is a new source subject to this subpart	The notifications specified in §63.9(b) (3) to (5)	No later than the dates specified §63.9(b)(4) and (5).
3. Qualifies for a compliance extension as specified in §63.9(c)	A request for a compliance extension as specified in §63.9(c)	No later than the dates specified in §63.6(i).
4. Is complying with organic HAP content limits, application equipment requirements; or MACT model point value averaging provisions	A notification of compliance status as specified in §63.9(h)	No later than 30 calendar days after the end of the first 12-month averaging period after your facility's compliance date.
5. Is complying by using an add-on control device	a. notification of intent to conduct a performance test as specified in §63.9(e)	No later than the date specified in §63.9(e).
	b. A notification of the date for the continuous monitoring system performance evaluation as specified in §63.9(g)	With the notification of intent to conduct a performance test.
	c. A notification of compliance status as specified in §63.9(h)	No later than 60 calendar days after the completion of the add-on control device performance test and continuous monitoring system performance evaluation.

Attachment K

This sheet or something similar may be used to help show compliance with HAP emission limitation requirements in the permit for Paint Booth (EP-10[Seg. 2] and solvent wipe down (EP-10A[Seg. 2])

Total HAP compliance worksheet

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

Column A	Column B	Column C	Column D
Process	Amount of Material Processed (gallons) (Note 1)	Total HAP emission factor (lb/gallon) (Note 2)	Process HAP Emissions (tons) (Note 3)
Paint Booth-catalyst			
Paint Booth-paint			
Solvent wipe			
Total HAP emissions for this month (tons) (Note 4):			
12-Month HAP emissions total from previous months worksheet (tons) (Note 5):			
Monthly HAP emissions total from previous years worksheet (tons) (Note 6):			
Current 12-Month total HAP emissions (tons) (Note 7):			

Note 1: Total amount of paint, catalyst, and solvent used in this process for the month.

Note 2: HAP emission factor determined by MSDS data.

Note 3: Column D= (Column B) * (Column C) ÷ (2000 lb/ton)

Note 4: Sum of emissions reported in Column D

Note 5: Running 12-month total of HAP emissions

Note 6: HAP emissions reported for this month in the last calendar year

Note 7: Amount reported in Note 4 minus the amount reported in Note 6 plus amount reported in Note 5. Less than 25 tons indicates compliance.

Attachment L

This sheet or something similar may be used to help show compliance with HAP emission limitation requirements in the permit for Paint Booth (EP-10[Seg. 2] and solvent wipe down (EP-10A[Seg. 2])

Individual HAP compliance worksheet

This sheet covers the month of _____ in the year _____ for the HAP _____.

Column A	Column B	Column C	Column D	Column E
Process	Amount of Material Processed (gallons) (Note 1)	Total HAP emission factor (lb/gallon) (Note 2)	Fraction of HAP in material (Note 3)	Process HAP Emissions (tons) (Note 4)
Paint Booth-catalyst				
Paint Booth-paint				
Solvent wipe				
Total HAP emissions for this month (tons) (Note 5):				
12-Month HAP emissions total from previous months worksheet (tons) (Note 6):				
Monthly HAP emissions total from previous years worksheet (tons) (Note 7):				
Current 12-Month total HAP emissions (tons) (Note 8):				

Note 1: Total amount of paint, catalyst, and solvent used in this process for the month.

Note 2: HAP emission factor determined by MSDS data.

Note 3: Fraction of HAP in each material as reported by MSDS (i.e. 10%=0.10)

Note 4: Column E= (Column B) * (Column C) * (Column D) ÷ (2000 lb/ton)

Note 5: Sum of emissions reported in Column E

Note 6: Running 12-month total of HAP emissions

Note 7: HAP emissions reported for this month in the last calendar year

Note 8: Amount reported in Note 5 minus the amount reported in Note 6 plus amount reported in Note 7. Less than 10 tons indicates compliance.

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. Intermediate Operating Permit Application, received November 19, 2007; revised March 20, 2009;
2. 2007 Emissions Inventory Questionnaire, received May 28, 2008;
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
4. Construction Permit 0497-017;
5. Construction Permit 042001-007;
6. Construction Permit 072003-017;
7. Alternate Recordkeeping Request, PAMS 2005-12-060;
8. Construction Permit Amendment 082009-006B;
9. Construction Permit Amendment 022009-003A;
10. Construction Permit Amendment 082009-006A; and
11. No Permit Required Project # 2011-04-042

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

40 CFR Part 63 Subpart VVVV, *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*

Applicability of this rule is detailed in the MACT Section below.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

None

Construction Permit History

The following construction permits have been issued to this installation:

1. Construction Permit 0497-017
This permit authorizes construction of the aluminum boat manufacturing installation. This permit does not appear in the operating permit because the special conditions were superceded by Construction Permit 022009-003.
2. Construction Permit 0599-005
This permit was issued April 19, 1999 to authorize construction of a paint booth. In this construction permit, the paint booth is referred to as EP-4. The paint booth uses one of the existing glue booths. Additionally, toluene will be used to wipe down the boat hulls prior to painting, the

toluene emissions are captured under emission point EP-3A. Since issuance of this construction permit, the installation has adopted a new naming convention. Therefore, in this Operating Permit, this paint booth is referred to as EP-10[Seg. 2] and the solvent wipe down emissions are referred to as EP-10A[Seg. 2]. This construction permit appears in this Operating Permit as Permit Condition EU0035-002 and EU0060-001.

3. Construction Permit 042001-007

This permit is a modification to Construction Permit 0497-017. This permit does not appear in the operating permit because the special conditions were superseded by Construction Permit 022009-003.

4. Construction Permit 072003-017

This permit authorizes construction of a paint booth. This permit does not appear in the operating permit because the special conditions were superseded by Construction Permit 022009-003, and also because this paint booth has been removed from site.

5. Recordkeeping Request, PAMS 2005-12-060; Construction Permit 072003-017A

This is a request to use alternate recordkeeping documentation in lieu of the forms that have been provided with Construction Permit 072003-017. This request was approved. This project is not included in this Operating Permit because this paint booth was removed.

6. Construction Permit 022009-003

This permit authorizes construction of a new paint booth and heat treat oven. This construction permit supercedes all previously issued construction permits, see Special Condition 1. Special Conditions 2 and 3 are superceded repeated by Construction Permit 082009-006. Special Condition 5 is repeated in Construction Permit 082009-006, which is used as the reference for this overlapping requirement.

7. Construction Permit 082009-006

This permit was issued August 19, 2009, to authorize construction of a dual paint booth, and a single paint booth, with two drying ovens and plasma cutters in the former Myacht building. This building will be renamed as Building #2. This permit supercedes Special Conditions 2 and 3 of Construction Permit 022009-003 [see Special Condition 1]. Special Condition 5 of this permit repeats the condition of Special Condition 5 of Construction Permit 022009-003. Since this is an overlapping requirement, it is only presented once in this operating permit and is cited under this construction permit.

This permit authorizes the permittee to move three paint booths (one dual booth and one single booth), two heated/drying ovens and one plasma cutter from the Boat Plant in Bolivar, to Plant #2 in Lebanon. The paint booths will be used for priming and painting aluminum boats. The plasma cutter will be used for cutting boat parts. Additionally, the permittee wishes to operate another plasma cutter from Plant #1 that had not previously been permitted.

The dual paint booth (EP-10[Seg.3]) is comprised on two chambers: one to apply primer and one to apply paint. Each chamber has associated stacks (S-1F, S-1G). The boats will be wiped down with toluene (EP-10[Seg.3]) before being primed and painted. The toluene wipe is considered a different emission point than the paint booth. PM₁₀ emissions will be captured with filters before exiting the stack. After painting at EP-10[Seg.3], each boat will be dried within a 1.5 MMBtu/hr heated/drying oven fueled by propane.

The single paint booth (EP-10[seg.4]) is comprised of one chamber to apply primer, hardener, paint, or a polyurea liner. The chamber has an associated stack (S-1H). The boats will be wiped down with toluene (EP-10A[seg.4]) before begin primed and painted. PM₁₀ emissions will be captured

with filters before exiting the stack. After painting, the boats will be dried in a 1.5 MMBtu/hr dryer fueled by propane. Emissions for the paint booths (EP-10[seg.3]) were based on a 65 percent transfer efficiency for electrostatic spray application and a 96 percent control efficiency for the series of three filters.

A current on-site plasma cutter (EP-11[Seg.1]) is located in Plant #1. The permittee has requested this equipment be permitted in this project. The plasma cutter was installed in 2000, and has a bottlenecked MHDR of 25.8 1000 inches cut per hour. The other plasma cutter (EP-11[Seg.2]) is being transferred from the Bolivar plant. This cutter has a bottlenecked MHDR of 14.056 1000 inches cut per hour. The emission factors were derived from a 1994 study by the American Welding Society; and are based on the thickness of the cuts. EP-11[Seg. 1] has an emission factor of 0.0203 lbs PM₁₀/1000 inches; and EP-11[seg.2] has an emission factor of 0.0165 lbs PM₁₀/1000 inches.

This construction permit removed all previous emissions limitations and restricted the installation to less than 250 tons VOC per consecutive twelve month period. This limitation appears as a plant wide permit limitation.

- 8. Construction Permit Amendment 022009-003A and
- 9. Construction Permit Amendment 082009-006A

Both of these amendments are addressed in one letter. The purpose of these amendments is to update and/or correct emission point numbers assigned to recently permitted equipment. The table below details the changes:

Permit No.	Equipment	Original EP#	Updated/Corrected EP#
022009-003	Paint Booth	EP-10 [Seg. 1]	No change
022009-003	Heat Treat Oven	EP-11	EP-12 [Seg. 1]
082009-006	Paint Booth	EP-10 [Seg. 3]	No change
082009-006	Heat Treat Oven	No EP#	EP-12 [Seg. 3]
082009-006	Paint Booth	EP-10 [Seg. 4]	No change
082009-006	Heat Treat Oven	No EP#	EP-12 [Seg. 4]
082009-006	Plasma Cutter	EP-11 [Seg. 1]	No change

- 10. Construction Permit Amendment 082009-006B

This amendment clarifies that 40 CFR Part 63 Subpart III, *Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production* does not apply to the installation. This regulation had originally been listed as an applicable requirement in CP082009-006.

- 11. No Permit Required Project # 2011-04-042

This determination is for the addition of manual routing equipment with two new plasma cutting machines (EP-11 [Seg. 3] and EP-11 [Seg. 4]). The plasma cutters will be used in the Plant #1 metal fabrication process, and is expected to increase the efficiency of this operation. However, the Plant #1 processes are bottlenecked by the painting and assembly activities to a maximum of four boats per hour. The plasma cutters will operate in parallel, therefore the potential emissions were based on two boats per hour per cutter. This is equivalent to 7,400 inches of 1/8 inch aluminum per hour per cutter. The emission factor is based on a 1994 study by the American Welding Society. EF = 0.1622 lbs PM₁₀ per 1,000 inches cut for 1" aluminum thickness. The cutters are equipped with a robovent exhaust system which is expected to control 99% of the particulate emissions. The potential emissions of the cutting units are 0.15 lb PM₁₀/hour (uncontrolled) and 8.2e-5 lb PM₁₀/hour (controlled). Since these emissions are less than the 1.0 lb/hour insignificant emissions threshold, a construction permit is not required.

New Source Performance Standards (NSPS) Applicability

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*

These regulations do not apply to the storage tanks (EP6 and 7). The smallest size tank covered by these regulations is 19,813 gallons. These storage tanks have capacities of 500 and 300 gallons, respectively.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart VVVV, *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*

This installation meets the definition of new, and the activities regulated are carpet and fabric adhesive operations and surface coating operations. The installation does not use any add on control equipment.

40 CFR Part 63 Subpart III, *Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production*

This regulation applies to flexible foam or rebond foam products formed by specific chemical reactions. This installation does not produce a flexible foam or rebond foam products. The foam produced at this installation is a rigid foam produced from a two part closed-cell structure system. The foam is placed into various compartments in the boats for floatation purposes. The cure time for the foam is less than two minutes and the foam is rigid once it cures. Additionally, this foam does not meet the definition of a flexible cellular product as outlined in Section 3.3 of the American Society for Testing Materials (ASTM) D3574 Standard. This standard is the required testing method for determining the flexibility of the cellular product regulated by this MACT. According to the installation, the rigid foam would rupture prior to completion of the test. Therefore, this regulation does not apply.

40 CFR Part 63 Subpart HHHHHH, *National Emissions Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

This subpart applies to area sources only. Tracker Marine is a major source of HAPs and is therefore not subject to this rule.

40 CFR Part 63 Subpart CCCCCC—National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

This subpart applies to gasoline dispensing facilities at area sources. This installation is a major source, therefore this regulation does not apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

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.

However, the emission units subject to emission limitations or standards proposed by the Administrator after November 15, 1990, pursuant to Section 111 or 112 of the Act following units are exempt from CAM requirements per 64.2(b)(i).

The units that would trigger CAM requirements are already regulated under MACT regulations which were promulgated after November 15, 1990. Therefore, CAM does not apply.

Other Regulatory Determinations

1) Operating Permit Applicability

The installation initially applied for an Intermediate Operating Permit, the application was received by the Air Pollution Control Program in November 2007. The application requested a 100 ton VOC per year voluntary condition to qualify for the Intermediate Operating Permit. At the time, the installation had limits through construction permitting of 250 ton/yr VOC and 10/25 tpy HAP. In August 2009, Construction Permit 082009-006 was issued, which eliminated the plant-wide HAP limitations, and reinstated the 250 tpy VOC limitation, making the installation a major source of HAP. The installation still retains the HAP limitations established by CP0599-005, as those limits apply to a specific piece of equipment, and do not apply on a plant-wide basis.

During the technical review of this operating permit, the installation verbally requested to reclassify as a Part 70 Operating Permit, and requested the removal of the 100 tpy VOC voluntary limitation. Therefore, this Part 70 Operating Permit is being issued to the installation.

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

Compliance demonstration for EU001 Gluing Application, EP-01

Coatings	Solids by wt (%)	MHDR (tons/hr)	Cont. PM PTE (lbs/hr)	Limit (lb/hr)
Adhesive	69.00	0.03	0.1449	0.39
PM Control Efficiency=99% control, Transfer Efficiency=65%				

Demonstration of qualification of exemption under 10 CSR 10-6.400(1)(B)12

EP#	Description	MHDR	MHDR units	PM Ef	PM Ef Units	Uncont. PM PTE (lb/hr)
EP-08A	Welding-Wire usage	0.0172	1000 lbs/hr	24.1	lb/1000 lbs	0.41
EP-08B	Welding-Rod usage	0.006	1000 lbs/hr	5.5	lb/1000 lbs	0.03
EP-09	Wood Cutting	0.293	tons/hr	0.2	lbs/ton	0.06

This rule does not apply to the paint booths, because they all have federally enforceable requirements that require the use of controls which have at least a 95 percent control efficiency. Therefore, these units are exempt per 6.400(1)(B)14.

This rule does not apply to the plasma cutters, as they have potential emissions less than 0.5 lb/hr, as shown below. Emissions from the plasma cutter is based on the bottlenecked rate of the amount of boats that can be produced in an hour. Emission Factor based on a 1994 study by the American Welding Society. EF = 0.1622 lbs PM₁₀ per 1,000 inches cut for 1" aluminum thickness. The emissions for EP-11 [Seg. 3] and EP-11 [Seg. 4] are detailed in the Construction Permit history section of this Statement of Basis.

EP-11[seg.1]

MHDR	25.8	1000 inches per hour
Bottlenecked		
Rate	875.2	inches per boat
	15	minutes to cut 1 boat
Cut Thickness	0.125	inches
EF	0.0203	lbs PM ₁₀ /1000 inches
PM ₁₀	0.31	tons/yr
	0.07	lb/hr

EP-11[seg.2]

MHDR	14.056	1000 inches per hour
Bottlenecked		
Rate	6255.2	inches per boat
	30	minutes to cut 1 boat
Cut Thickness	0.1019	inches
EF	0.0165	lbs PM ₁₀ /1000 inches
PM ₁₀	0.91	tons/yr
	0.21	lb/hr

3) 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants

Applicability to EU0010 Gluing Operating, EP-01

In the operating permit application, the installation indicated that this source was constructed in 2003, which satisfies the definition of a new unit for this regulation. Therefore, the opacity limitation for new units was included in the permit condition.

Applicability to EU0020, Wood Cutting, EP-09

In the operating permit application, the installation indicated that these units were installed under the authority of Construction Permit 072003-017. Therefore, the opacity limitation for new units was included in the permit condition.

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 Air Pollution Control Program'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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Nicole Weidenbenner, P.E.
Environmental Engineer

Mr. Steve W. Smith
Vice President and Chief Financial Officer
Tracker Marine-Lebanon
P.O. Box 552
Lebanon, MO 65536

Re: Tracker Marine-Lebanon, 105-0046
Part 70 Minor Modification Permit Number: **OP2010-119A**

Dear Mr. Smith:

Enclosed with this letter is your modified 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. Please note that the expiration date is the same as the original issued permit, December 26, 2015.

This permit has been modified to include emission point EP-10 [Seg. 2], a paint booth which was not included in the original operating permit (OP2010-119); to add emission points EP-10A [Seg. 1], EP-10A [Seg. 2], and EP-10A [Seg. 3] in order to clarify that each paint booth has associated solvent wipe down emissions, and to correct a typographical error and clarify that there are drying ovens associated with each paint booth, EP-12 [Seg. 1], EP-12 [Seg. 2], EP-12 [Seg. 3], and EP-12 [Seg. 4]. This amendment also incorporates the gasoline and diesel storage tanks (EP-06 and 07, respectively) and two new plasma cutters (EP-11 [Seg. 3] and EP-11 [Seg. 4]) into the permit. Additionally, the Statement of Basis includes permit amendments 022009-003A, 082009-006A, 082009-006B, and no permit required determination #2011-04-042.

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.

Mr. Steve W. Smith
Page Two

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Nicole Weidenbenner, P.E., at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:nwk

Enclosures

c: Southwest Regional Office
PAMS File: 2012-04-065