

PERMIT BOOK

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: **022015-004** Project Number: 2014-06-084  
Installation Number: 105-0046

Parent Company: Tracker Marine Group  
Parent Company Address: 2500 East Kearney, Springfield, MO 65803  
Installation Name: Tracker Marine – Lebanon Plant  
Installation Address: 1500 Maple Lane, Lebanon, MO 65536  
Location Information: Laclede County, S14, T34N, R16W

Application for Authority to Construct was made for:  
Installation of new equipment and modification of existing equipment to increase production by 25%. This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

**FEB 05 2015**

EFFECTIVE DATE

A handwritten signature in cursive script, appearing to read "Kya L. Moore".  
\_\_\_\_\_  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

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

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

You shall notify the Department's Air Pollution Control Program of the anticipated date of start up of these air contaminant sources. The information shall be made available within 30 days of actual startup. Also, you shall notify the Department of Natural Resources' Southwest Regional Office within 15 days after the actual start up of these air contaminant sources.

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

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

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

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

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**SPECIAL CONDITIONS:**

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

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

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

1. **Superseding Condition**  
The conditions of this permit supersede Special Conditions 2 through 7 found in Construction Permit 052013-001 issued by the Air Pollution Control Program.
2. **VOC Emission Limitation**
  - A. Tracker Marine – Lebanon Plant shall emit less than 250.0 tons of VOCs in any consecutive 12-month period from the entire installation as listed in Table 3.
  - B. Attachment A or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2.A.
3. **Operational Limitations**
  - A. Tracker Marine – Lebanon Plant shall not handle material in excess of the following amounts per consecutive 12-month period:
    - 1) EP-06A Gasoline: 7,227 gallons
    - 2) EP-10(3)A-1 PPG Touchup Paints – all colors: 1,314 gallons
    - 3) EP-10(3)A-2 Pewter Wash Primer Base: 88 gallons
    - 4) EP-10(3)B Camouflage Paints (Mud Brown, Marsh Grass, & Charcoal Green): 7,446 gallons
    - 5) EP-13A Ecomate Blowing Agent: 27,215 gallons
    - 6) EP-13B Flotation Foam: 585,278 gallons
    - 7) EP-14 177885 Anodized Aluminum: 1,226 gallons
    - 8) EP-01A #348 Waterbase Adhesive: 23,258 gallons
    - 9) EP-01A & EP-01B VA 332 Adhesive : 39,464 gallons
    - 10) EP-29 Toluene: 2,409 gallons
  - B. Attachment B or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 3.A.

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#### SPECIAL CONDITIONS:

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

4. Control Device Requirements – Dust Collectors and/or Filters
  - A. Tracker Marine – Lebanon Plant shall control particulate emissions from the following emission sources using dust collectors and/or filters as specified in the permit application:
    - 1) EP-01B Gluing Operations
    - 2) EP-10(3)A-1 Paint Booth #3 - Touchup
    - 3) EP-10(3)B Paint Booth #3 – Camouflage
    - 4) EP-10(3)A-2 Paint Booth #3 - Primer
    - 5) EP-11(1) Plasma Cutter #1
    - 6) EP-11(2) Plasma Cutter #2
    - 7) EP-11(3) Plasma Cutter #3
    - 8) EP-11(5) Plasma Cutter #5
    - 9) EP-11(6) Plasma Cutter #6
    - 10) EP-17 Powder Coat Booth #1
    - 11) EP-19 Powder Coat Booth #2
    - 12) EP-21 Clear Powder Coat Booth
  - B. The dust collectors and filters shall be operated and maintained in accordance with the manufacturer's specifications. The dust collectors and filters shall be equipped with gauges or meters, which indicates the pressure drop across the control devices. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.
  - C. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
  - D. Tracker Marine – Lebanon Plant shall monitor and record the operating pressure drop across the dust collectors and filters at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
  - E. Tracker Marine – Lebanon Plant shall maintain a copy of the manufacturer's performance warranty for the dust collectors and filters on site.

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#### SPECIAL CONDITIONS:

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

- F. Tracker Marine – Lebanon Plant shall maintain an operating and maintenance log for the dust collectors and filters which shall include the following:
  - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
  
- 5. Control Device Requirements – Cyclones
  - A. Tracker Marine – Lebanon Plant shall control particulate emissions from EP-09 Plywood Cutting - Sawdust using cyclones as specified in the permit application.
  
  - B. Tracker Marine – Lebanon Plant shall conduct visible emissions monitoring of the cyclone at least once every 24 hours of operation. Visible emissions monitoring shall be conducted using EPA Test Method 22-like procedures. If visible emissions are present, Tracker Marine – Lebanon Plant shall perform maintenance on the cyclone. Maintenance shall be conducted no later than eight hours of operation after the visible emissions are observed. Maintenance shall include, but is not limited to:
    - 1) Inspection of the solids discharge valve for proper operation
    - 2) Inspection of the structural components including the cyclone ductwork and hood for leaks and/or component failure.
    - 3) Inspection of the barrel and collecting tube for deposits and/or excess wear and cleaning/repairing as necessary. Dents in the barrel or collecting tube shall be removed to ensure proper operation.
    - 4) Cleaning of the cyclone inlet vanes.
  
  - C. Tracker Marine – Lebanon Plant shall maintain an operating and maintenance log for the cyclones which shall include the following:
    - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions;
    - 2) Visible emission observations; and
    - 3) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

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**SPECIAL CONDITIONS:**

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

6. Operational Requirement – Liquid Paints/Solvents/Adhesives
  - A. Tracker Marine – Lebanon Plant shall keep all liquid paints, solvents, and adhesives in sealed containers whenever the materials are not in use.
  - B. Tracker Marine – Lebanon Plant shall provide and maintain suitable, easily read, permanent markings on all liquid paint, solvent, and adhesive containers used at the installation.
7. Use of Alternative Coatings/Solvents/Adhesives
  - A. When considering the use of an alternative material that is different than the materials listed in the Application for Authority to Construct, Tracker Marine – Lebanon Plant shall compare the SDS for the new material to the maximum permitted values in Table 1.

**Table1: Maximum Permitted Material Contents (lb/gal)**

Material	VOC	Individual HAPs
EP-10(3)A-1 PPG Touchup Paints – all colors	5.53	Xylene (1330-20-7): 4.81 Ethylbenzene (100-41-4): 1.04 Toluene (108-88-3): 0.56 MIBK (108-10-1): 0.40
EP-10(3)A-2 Pewter Wash Primer Base	5.94	MIBK (108-10-1): 0.66 Toluene (108-88-3): 0.62 Chromium (VI) Compounds: 0.58
EP-10(3)B Camouflage Paints (Mud Brown, Marsh Grass, & Charcoal Green)	4.80	Xylene (1330-20-7): 1.39 Ethylbenzene (100-41-4): 0.33
EP-13A Ecomate Blowing Agent	0.73	Methanol (67-56-1): 0.73
EP-14 177885 Anodized Aluminum	5.07	Xylene (1330-20-7): 1.84 Ethylbenzene (100-41-4): 0.45
EP-01A #348 Waterbase Adhesive	4.10	Vinyl Acetate (108-05-4): 0.01 Formaldehyde (50-00-0): 0.01
EP-01A & EP-01B VA 332 Adhesive	4.10	Xylene (1330-20-7): 0.004
EP-29 Toluene	7.26	Toluene (108-88-3): 7.26

- B. Tracker Marine – Lebanon Plant shall seek approval from the Air Pollution Control Program prior to using any alternative material which contains an individual HAP or VOC in excess of the values in Table 1.

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**SPECIAL CONDITIONS:**

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

- C. Tracker Marine – Lebanon Plant shall calculate monthly and 12-monthly rolling total VOC emissions from all alternate materials and include the calculation in Attachment A.
  - D. Alternate materials shall comply with the 12-month rolling total usage limits of Special Condition 3 for the material being replaced.
  - E. Tracker Marine – Lebanon Plant shall maintain SDS for all alternative materials to demonstrate compliance with Special Condition 7.A.
8. Record Keeping and Reporting Requirements
- A. Tracker Marine – Lebanon Plant shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. These records shall include MSDS for all materials used.
  - B. Tracker Marine – Lebanon Plant shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

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

Project Number: 2014-06-084  
Installation ID Number: 105-0046  
Permit Number:

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

Complete: August 11, 2014

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

Laclede County, S14, T34N, R16W

REVIEW SUMMARY

- Tracker Marine – Lebanon Plant has applied for authority to install new equipment and modify existing equipment to increase production by 25%.
- HAP emissions are expected from the proposed equipment. HAP emissions will result from plasma cutting, welding, the combustion of natural gas, the application of liquid coatings and adhesives, and the use of solvents. HAPs from the installation are limited by the material handling restrictions of Special Condition 3 and the maximum permitted material content restrictions of Special Condition 7.
- 40 CFR Part 63, Subpart VVVV – *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing* is applicable to the installation.
- 40 CFR Part 63, Subpart CCCCCC – *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities* is not applicable to the installation and has not been applied within this permit. Although the installation does dispense gasoline into company vehicles and lawn care equipment, the installation is not an area source of HAP; therefore, the installation does not meet the applicability requirements of §63.11111(a).
- Dust collectors are being used to control particulate emissions from EP-11(1), EP-11(2), EP-11(3), EP-11(5), and EP-11(6). Filters are being used to control particulate emissions from EP-01B, EP-10(3)A-1, EP-10(3)B, EP-10(3)A-2, EP-17, EP-19, and EP-21. Special Condition 4 is a federally enforceable condition requiring the use of the dust collectors and filters. Cyclones are being used to control particulate emissions from EP-09. Special Condition 5 is a federally enforceable condition requiring the use of the cyclones.

- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*. Potential emissions of VOC are above the de minimis levels.
- This installation is located in Laclede County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed for this review. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions. Individual HAPs were limited to their respective SMALs by the material handling restrictions of Special Condition 3 and the maximum permitted material content restrictions of Special Condition 7.
- Emissions testing is not required for the equipment.
- The modifications to the existing equipment allowed by this permit shall be included in the installation's Part 70 operating permit renewal, Project 2014-06-070, currently under review.
- Approval of this permit is recommended with special conditions.

#### INSTALLATION DESCRIPTION

Tracker Marine Group owns and operates an aluminum boat manufacturing installation in Lebanon, Missouri. Raw materials are brought to the installation, cut to the appropriate size, and welded together. The boats are then painted. The majority of painting is done by powder coating; however, some liquid paint is still used for camouflaging. The painted boats are transferred to ovens to allow the paint to cure. Additional materials are added to the craft, including floatation foaming for buoyancy, various pumps, and other assorted watercraft necessities. Toluene is used to remove excess paint from U-bolts at both ends of the boats. After drying, glue is sprayed into the interior and covered with carpeting. Finally, the entire boat is assembled, including attaching the engine and fuel tanks to the main assembly. The final product is then taken to an on-site storage yard to await shipping to customers.

Tracker Marine – Lebanon Plant is a synthetic minor source for construction permits. The installation operates under OP2010-119A which remains effective until their Part 70 renewal application, Project 2014-06-070, is issued. The modifications to the existing equipment allowed by this permit will be included in the installation's Part 70 operating permit renewal.

The following New Source Review permits have been issued to Tracker Marine – Lebanon Plant by the Air Pollution Control Program:

**Table 2: Permit History**

Permit Number	Description
0497-017	Installation of an aluminum boat manufacturing facility
0599-005	Installation of a new paint booth
042001-007	Modification of 0497-017 for an increase in VOC emission restrictions
072003-017	Installation of a new paint booth
022009-003	Installation of a new paint booth and heat treat oven
082009-006	Construction of a dual paint booth, single paint booth, and plasma cutters in the former Myacht building
082009-006A	Emission point notation correction
022009-003A	Emission point notation correction
052013-001	Installation of a powder coating system, wood router, burn-off oven, and ancillary equipment

### PROJECT DESCRIPTION

Tracker Marine – Lebanon Plant applied for 052013-001 to increase production by 25%; however, the installation failed to identify all new and modified emission sources. The installation submitted an amendment request for the installation of two new plasma cutters, installation of a new convection oven, and modification of the existing dual sided paint booth. These new and modified emission sources are considered part of the original project permitted under 052013-001, but could not be permitted as an amendment as they result in an emissions increase. The entire project is; therefore, being re-evaluated by this permit. The special conditions of 052013-001 have been superseded. Table 3 contains a list of all emission sources at the installation.

**Table 3: Installation Emission Source List**

Emission Unit	Description	MHDR
EP-01A	Gluing Operations (Assembly Line)	2.655 gal/hr = 9 boats/hr
EP-01B	Gluing Operations (HEPA filter)	1.85 gal/hr = 9 boats/hr
EP-06A	Gasoline Storage Tank - Working Losses	0.825 gal/hr
EP-06B	Gasoline Storage Tank - Breathing Losses	300 gallons – capacity
EP-07A	Diesel Storage Tank - Working Losses	3.375 gal/hr
EP-07B	Diesel Storage Tank - Breathing Losses	300 gallons – capacity
EP-08A	Welding - Wire Usage	12.5 lb/hr
EP-08B	Welding - Rod Usage	15.24 lb/hr
EP-09	Plywood Cutting (Sawdust)	0.285 tph
EP-10(3)A-1	Paint Booth #3 – Touchup Paint	0.15 gal/hr
EP-10(3)A-2	Paint Booth #3 – Primer	0.01 gal/hr
EP-10(3)B	Paint Booth #3 – Camouflage	0.85 gal/hr = 1 boat/hr
EP-11(1)	Plasma Cutter - 875.2 in/boat	25,800 in/hr = 3 boats/hr
EP-11(2)	Plasma Cutter - 6,255.2 in/boat	14,056 in/hr = 2 boats/hr
EP-11(3)	Plasma Cutter - 3,700 in/boat	7,400 in/hr = 2 boats/hr
EP-11(5)	Plasma Cutter - 2,400 in/boat	7,200 in/hr = 3 boats/hr
EP-11(6)	Plasma Cutter - 3,700 in/boat	11,100 in/hr = 3 boats/hr
EP-12(3)	Drying Oven for Paint Booth EP-10(3)	1.5 MMBtu/hr natural gas
EP-13A	Flotation Foaming – Blowing Agent	4.23 gal/hr = 9 boats/hr

EP-13B	Flotation Foaming – Flotation Foam	74.25 gal/hr = 9 boats/hr
EP-13C	Flotation Foaming – Touch ‘n Foam	0.33 gal/hr = 9 boats/hr
EP-14	Pontoon Boat Touchup Spray Painting	0.14 gal/hr = 1.2 12 oz cans/hr
EP-15	Acid Wash System	4 MMBtu/hr natural gas
EP-16	Dry-Off Oven	1.6 MMBtu/hr natural gas
EP-17	Powder Coat Booth #1	0.075 tph
EP-18	Infrared Oven #1	0.72 MMBtu/hr natural gas
EP-19	Powder Coat Booth #2	0.075 tph
EP-20	Infrared Oven #2	0.72 MMBtu/hr natural gas
EP-21	Clear Powder Coat Booth	0.075 tph
EP-22	Powder Coat Cure Oven	3.2 MMBtu/hr natural gas
EP-23	Make-up Air Units (4)	Two new - 3.3 MMBtu/hr natural gas each Two existing – 2.5 MMBtu/hr natural gas each
EP-25	Infrared Space Heaters	4.85 MMBtu/hr natural gas
EP-26	Burn-off Oven	0.875 MMBtu/hr natural gas
EP-28	Convection Oven	2.4 MMBtu/hr natural gas
EP-29	Toluene Cleaner	0.275 gal/hr

Project emissions from modified emission sources EP-01A, EP-01B, and EP-08A are based upon the emissions increase from this project as follows:

**Table 4: Project Emissions Increase (tpy) from Modified Emission Sources**

Emission Source	Pollutant	PTE	BAE (2010 & 2011)	Project Emissions Increase
EP-01A	VOC	47.68	21.30	26.38
EP-01B	VOC	33.22	20.15	13.07
EP-08A	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	1.32	0.24	1.08

### EMISSIONS/CONTROLS EVALUATION

Emissions from EP-01A, EP-01B, EP-10(3)A-1, EP-10(3)B, EP-13A, EP-13C, EP-14, and EP-29 were evaluated using a mass balance approach, assuming 100 percent emission of volatiles. Special Condition 7 restricts alternate materials to the maximum permitted material contents of the materials presented in the application.

A transfer efficiency of 65% was applied to EP-10(3)A-1, EP-10(3)B, EP-10(3)A-2, and EP-14 as provided by the manufacturer for the electrostatic spray application. A transfer efficiency of 95% was applied to EP-01A and EP-01B for the electrostatic disk spray application to a flat surface from Table 5-7 of APTI Course 482.

A particulate control efficiency of 95% was included in emission calculations for EP-10(3)A-1, EP-10(3)B, and EP-10(3)A-2 from the use of filters required by Special Condition 4. A particulate control efficiency of 99% was included in emission calculations for EP-01B for the use of a HEPA filter as required by Special Condition 4.

Working and breathing loss emission factors for EP-06 and EP-07 were obtained from FIRE for Process SCC 40301001, 40301007, 40301019, and 40301021.

Emissions from EP-08A were calculated using emission factors obtained from FIRE for Process SCC 30905226.

Emissions from EP-08B were calculated using an emission factor of 0.01 pounds of fume per pound of rod consumed obtained from the California Air Resources Board as no emission factors are available for tungsten inert gas arc welding in AP-42.

Emissions from EP-09 were calculated using emission factors obtained from FIRE for Process SCC 30700802. A particulate control efficiency of 50% was included in emission calculations for EP-09 for the use of cyclones required by Special Condition 5.

Emissions from EP-11(1), EP-11(2), EP-11(3), EP-11(5), and EP-11(6) were obtained from the paper "Fume Emissions Testing for Plasma Arc Cutting" by Hypertherm, Inc. in 1998. In the paper, Table 3A provided emission factors in pounds emitted per inch of metal cut for  $\frac{1}{4}$  inch aluminum. A particulate control efficiency of 99% was included in emission calculations for EP-11(1), EP-11(2), EP-11(3), EP-11(5), and EP-11(6) for the use of dust collectors required by Special Condition 4.

Emissions from the combustion of natural gas in EP-12(3), EP-15, EP-16, EP-18, EP-20, EP-22, EP-23, EP-25, EP-26, and EP-28 were calculated using emission factors obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4 "Natural Gas Combustion" (July 1998).

Emissions from EP-13B were calculated using the American Chemistry Council's MDI Emissions Estimator.

Emissions from EP-17, EP-19, and EP-21 were calculated using a mass balance approach with a transfer efficiency of 93% obtained from AP-42. A particulate control efficiency of 98% was included in emission calculations for EP-17, EP-19, and EP-21 for the use of filters required by Special Condition 4.

The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit 082009-006. Existing actual emissions were taken from the installation's 2012 EIQ. Potential emissions of the application represent the potential of the modified installation, assuming continuous operation (8,760 hours per year).

**Table 5: Emissions Summary (tons per year)**

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2012 EIQ)	Potential Emissions of the Application
PM	25.0	N/D	N/D	8.62
PM <sub>10</sub>	15.0	22.05	8.18	9.17
PM <sub>2.5</sub>	10.0	N/D	7.90	9.17
SO <sub>x</sub>	40.0	0.03	N/D	0.06
NO <sub>x</sub>	40.0	8.4	N/D	20.60
VOC	40.0	<250.0	115.49	<250.0
CO	100.0	2.62	N/D	9.47
GHG (CO <sub>2</sub> e)	100,000	N/D	N/D	13,563.27
HAPs	25.0	Major	11.18	24.12
Methanol (67-56-1)	10.0 <sup>1</sup>	N/D	N/D	10.0
Toluene (108-88-3)	10.0 <sup>1</sup>	N/D	9.20	9.15
Xylene (1330-20-7)	10.0 <sup>1</sup>	N/D	0.15	9.53
Ethylbenzene (100-41-4)	10.0 <sup>1</sup>	N/D	0.01	2.20
MIBK (108-10-1)	10.0 <sup>1</sup>	N/D	0.64	0.29
Hexane (110-54-3)	10.0 <sup>1</sup>	N/D	N/D	0.20
Vinyl Acetate (108-05-4)	1.0 <sup>1</sup>	N/D	0.06	0.10
Formaldehyde (50-00-0)	2.0 <sup>1</sup>	N/D	0.06	0.10
Chromium (VI) Compounds	0.002 <sup>1</sup>	N/D	0.56	0.0006

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

<sup>1</sup>This value represents the SMAL.

Potential VOC emissions from the modified installation are limited to 250.0 tpy to retain synthetic minor construction permit status.

The material usage limit for EP-13A Flotation Foam – Blowing Agent is based upon the maximum amount the installation can use before exceeding the Methanol SMAL of 10.0 tpy. All other material usage limits are based upon the MHDRs in Table 3.

Special Condition 8 does allow for the use of alternative materials provided the alternative material contains equal to or less VOC and individual HAP than the permitted material and the alternate material complies with the material usage restriction of Special Condition 3 for the material being replaced.

## PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*. Potential emissions of VOC are above de minimis levels.

## APPLICABLE REQUIREMENTS

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

### GENERAL REQUIREMENTS

- 10 CSR 10-6.065 *Operating Permits*
- 10 CSR 10-6.110 *Submission of Emission Data, Emission Fees and Process Information*
- 10 CSR 10-6.165 *Restriction of Emission of Odors*
- 10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*
- 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*

### SPECIFIC REQUIREMENTS

- 10 CSR 10-6.075 *Maximum Achievable Control Technology Regulations*
  - 40 CFR Part 63, Subpart VVVV – *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*
- 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* is applicable to EP-01A.
  - With an MHDR of 2.655 gal/hr, a density of 9.0 lb/gal, a solids content of 4.95 lb/gal, and a transfer efficiency of 95%, EP-01A has a process weight rate of 23.90 tph resulting in a limit of 34.38 lb/hr. Potential emissions from EP-01A are 0.66 lb/hr; therefore, the emission source is in compliance without the aid of a control device.

## STAFF RECOMMENDATION

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

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Alana L. Hess, P.E.  
New Source Review Unit

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Date

### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated June 25, 2014, received June 26, 2014, designating Tracker Marine Group as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- WebFIRE.
- Hypertherm, Inc. 1998. "Fume Emissions Testing for Plasma Arc Cutting."





## APPENDIX A

### Abbreviations and Acronyms

<b>%</b> .....percent	<b>m/s</b> ..... meters per second
<b>°F</b> .....degrees Fahrenheit	<b>Mgal</b> ..... 1,000 gallons
<b>acfm</b> ..... actual cubic feet per minute	<b>MW</b> ..... megawatt
<b>BACT</b> ..... Best Available Control Technology	<b>MHDR</b> ..... maximum hourly design rate
<b>BAE</b> ..... Baseline Actual Emissions	<b>MMBtu</b> .... Million British thermal units
<b>BMPs</b> ..... Best Management Practices	<b>MMCF</b> ..... million cubic feet
<b>Btu</b> ..... British thermal unit	<b>MSDS</b> ..... Material Safety Data Sheet
<b>CAM</b> ..... Compliance Assurance Monitoring	<b>NAAQS</b> ... National Ambient Air Quality Standards
<b>CAS</b> ..... Chemical Abstracts Service	<b>NESHAPs</b> ..... National Emissions Standards for Hazardous Air Pollutants
<b>CEMS</b> ..... Continuous Emission Monitor System	<b>NO<sub>x</sub></b> ..... nitrogen oxides
<b>CFR</b> ..... Code of Federal Regulations	<b>NSPS</b> ..... New Source Performance Standards
<b>CO</b> ..... carbon monoxide	<b>NSR</b> ..... New Source Review
<b>CO<sub>2</sub></b> ..... carbon dioxide	<b>PM</b> ..... particulate matter
<b>CO<sub>2e</sub></b> ..... carbon dioxide equivalent	<b>PM<sub>2.5</sub></b> ..... particulate matter less than 2.5 microns in aerodynamic diameter
<b>COMS</b> ..... Continuous Opacity Monitoring System	<b>PM<sub>10</sub></b> ..... particulate matter less than 10 microns in aerodynamic diameter
<b>CSR</b> ..... Code of State Regulations	<b>ppm</b> ..... parts per million
<b>dscf</b> ..... dry standard cubic feet	<b>PSD</b> ..... Prevention of Significant Deterioration
<b>EIQ</b> ..... Emission Inventory Questionnaire	<b>PTE</b> ..... potential to emit
<b>EP</b> ..... Emission Point	<b>RACT</b> ..... Reasonable Available Control Technology
<b>EPA</b> ..... Environmental Protection Agency	<b>RAL</b> ..... Risk Assessment Level
<b>EU</b> ..... Emission Unit	<b>SCC</b> ..... Source Classification Code
<b>fps</b> ..... feet per second	<b>scfm</b> ..... standard cubic feet per minute
<b>ft</b> ..... feet	<b>SIC</b> ..... Standard Industrial Classification
<b>GACT</b> ..... Generally Available Control Technology	<b>SIP</b> ..... State Implementation Plan
<b>GHG</b> ..... Greenhouse Gas	<b>SMAL</b> ..... Screening Model Action Levels
<b>gpm</b> ..... gallons per minute	<b>SO<sub>x</sub></b> ..... sulfur oxides
<b>gr</b> ..... grains	<b>SO<sub>2</sub></b> ..... sulfur dioxide
<b>GWP</b> ..... Global Warming Potential	<b>tph</b> ..... tons per hour
<b>HAP</b> ..... Hazardous Air Pollutant	<b>tpy</b> ..... tons per year
<b>hr</b> ..... hour	<b>VMT</b> ..... vehicle miles traveled
<b>hp</b> ..... horsepower	<b>VOC</b> ..... Volatile Organic Compound
<b>lb</b> ..... pound	
<b>lbs/hr</b> ..... pounds per hour	
<b>MACT</b> ..... Maximum Achievable Control Technology	
<b>µg/m<sup>3</sup></b> ..... micrograms per cubic meter	

Mr. Dan Hoy  
Director of Facilities  
Tracker Marine – Lebanon Plant  
2500 East Kearney  
Springfield, MO 65803

RE: New Source Review Permit - Project Number: 2014-06-084

Dear Mr. Hoy:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and submittal of a revised Part 70 operating permit renewal application are necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp  
New Source Review Unit Chief

SH:ahl

Enclosures

c: Southwest Regional Office  
PAMS File: 2014-06-084

Permit Number: