

Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

DEC 12 2018

Mr. Dan Hoy
Tracker Marine - Lebanon Plant
2500 E. Kearney Street
Springfield, MO 65803

Re: Part 70 Operating Permit Renewal
Installation ID: 105-0046, Permit Number: OP2018-101

Dear Mr. Hoy:

Enclosed with this letter is your 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.

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

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.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:abj

Enclosures

c: PAMS File: 2014-06-070



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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: OP2018-101
Expiration Date: DEC 12 2023
Installation ID: 105-0046
Project Number: 2014-06-070

Installation Name and Address

Tracker Marine - Lebanon Plant
1500 Maple Lane
Lebanon, MO 65803
Laclede County

Parent Company's Name and Address

Tracker Marine Group
2500 E. Kearney Street
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 boats are 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 boats are assembled, including attaching the engine and fuel tanks to the main assembly. The final products are taken to an on-site storage yard to await shipping to customers.

The installation is an operating permit major source for Hazardous Air Pollutants and for Volatile Organic Compounds. The installation is subject to 40 CFR Part 63, Subpart VVVV, *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.*

DEC 12 2018

Effective Date

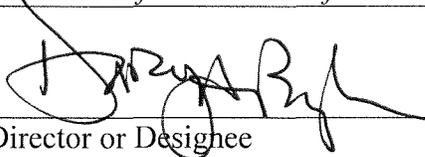

Director or Designee
Department of Natural Resources

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I. Installation Equipment Listing

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.

Emission Unit #	Description of Emission Unit
EP-01A	Gluing Operations (Assembly Line)
EP-01B	Gluing Operations (HEPA filter)
EP-06A & B	Gasoline Storage Tank
EP-09	Plywood Cutting (Sawdust)
EP-10(3)A-1	Paint Booth #3 – Touchup Paint
EP-10(3)A-2	Paint Booth #3 - Primer
EP-10(3)B	Paint Booth #3 - Camouflage
EP-11(1)	Plasma Cutter – 875.2 in/boat
EP-11(2)	Plasma Cutter – 6,255.2 in/boat
EP-11(3)	Plasma Cutter – 3,700 in/boat
EP-11(5)	Plasma Cutter – 2,400 in/boat
EP-11(6)	Plasma Cutter – 3,700 in/boat
EP-12(3)	Drying Oven for Paint Booth #3
EP-13A	Flotation Foaming – Blowing Agent
EP-13B	Flotation Foaming – Flotation Foam
EP-14	Pontoon Boat Touchup Spray Painting
EP-15	Acid Wash System
EP-16	Dry-off Oven
EP-17	Powder Coat Booth #1
EP-18	Infrared Oven #1
EP-19	Powder Coat Booth #2
EP-20	Infrared Oven #2
EP-21	Clear Powder Coat Booth
EP-22	Powder Coat Cure Oven
EP-23	Make-up Air Units (4)
EP-25	Infrared Space Heaters
EP-26	Burn-off Oven
EP-28	Convection Oven
EP-29	Toluene Cleaner
EP-30E	Touch-up Paint Booth

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-07A&B	Diesel Storage Tank
EP-08A	Welding – Wire Usage
EP-08B	Welding – Rod Usage
EP-13C	Flotation Foaming – Touch ‘n Foam
N/A	Haul Roads

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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Specific Limitations.

PERMIT CONDITION VOC

10 CSR 10-6.065 Operating Permits – Voluntary Limitation(s)
10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 022015-004, Issued February 4, 2015

Emission Limitation:

The permittee shall emit less than 250.0 tons of Volatile Organic Compounds (VOC) in any consecutive 12-month period from the entire installation. [Voluntary Limitation]

Operational Limitation:

- 1) The permittee shall keep all liquid paints, solvents, and adhesives in sealed containers whenever the materials are not in use. [Special Condition 6.A.]
- 2) The permittee shall provide and maintain suitable, easily read, permanent markings on all liquid paint, solvent, and adhesive containers used at the installation. [Special Condition 6.B.]

Monitoring/Recordkeeping:

- 1) Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limitation. [Special Condition 2.B.]
- 2) 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. These records shall include MSDS for all materials used. [Special Condition 8.A.]

Reporting:

- 1) The permittee shall report any exceedance of any limitation imposed by this permit condition, or any malfunction which could cause an exceedance of this permit condition, no later than ten (10) days after the exceedance or event causing the exceedance.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and in the annual compliance certification required by Section V of this permit.
- 3) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. [Special Condition 8.B.]

PERMIT CONDITION VVVV

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 Limitation:

- 1) Carpet and fabric adhesives
 - a) The permittee 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 Coat 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)(i) and (ii), or the combined emission limit in §63.5743(a)(iii). Compliance with these limitations is based on a 12-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 following work practice standards when cleaning aluminum coating spray guns with solvents containing more than 5 percent organic HAP by weight. [§63.5743(b)]
 - i) Clean spray guns in an enclosed device. Keep the device closed except when placing spray guns in or removing 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 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 is kept closed when not using it. [§63.5743(b)(3)]
 - iv) An alternative gun cleaning process or technology approved by the Director according to the procedures in §63.6(g). [§63.5743(b)(4)]

Compliance for Aluminum Wipedown Solvents and 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 12-month rolling average calculated at the end of every month. [§63.5746(d)]
- 5) At the end of the twelfth month after the compliance date and at the end of every subsequent month, the permittee shall 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 Director 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 Director will approve the alternative means of limiting emissions if the Director 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 Director'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 Subpart VVVV. [§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 12 months. [§63.5749(a)]

$$HAP_{WD} = \frac{\sum_{j=1}^n (Vol_j)(D_j)(W_j)}{\sum_{i=1}^m (Vol_i)(Solids_i)} \quad (\text{Eq. 1})$$

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 12 months.

Vol_j = volume of aluminum wipedown solvent j used in the past 12 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 12 months.

Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 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 12-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 the permittee is 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 12 months. [§63.5752(a)]

$$HAP_{SC} = \frac{\sum_{i=1}^m (Vol_i)(D_i)(W_i) + \sum_{k=1}^p (Vol_k)(D_k)(W_k)}{\sum_{i=1}^m (Vol_i)(Solids_i)} \quad (\text{Eq. 2})$$

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 12 months.

Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 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 12 months.

Vol_k = total volume of thinner, activator, or additive k used in the past 12 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 12-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 the permittee is 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:
- 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)]

$$HAP_{Combined} = HAP_{WD} + HAP_{SC} \quad (\text{Eq. 3})$$

Where:

HAP_{WD} = the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months, calculated using equation 1.

HAP_{SC} = the weighted average organic HAP content of aluminum recreational boat surface coatings used in the past 12 months, calculated using equation 2.

- Compliance is based on a 12-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 the permittee is in compliance with the emission limit specified in §63.5743(a)(3). [§63.5753(b)]

Compliance with Aluminum Recreational Boat Surface Coating Spray Gun Cleaning Work Practice Standards:

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).

- The permittee must demonstrate that solvents used to clean the aluminum coating spray guns contain no more than 5 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)]
- For solvents containing more than five percent organic HAP by weight, comply with the requirements in §63.5755(b)(1) or (b)(2), and §63.5755(b)(3). [§63.5755(b)]
 - If 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)]
 - If 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)]
 - 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:

- To determine the organic HAP content for each material used in 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)]
 - The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in §63.5758(a)(1)(i) and (ii) when determining organic HAP content by Method 311. [§63.5758(a)(1)]
 - 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, the permittee does not need to include it in the organic HAP total. Express the mass fraction of each organic HAP

- measured as a value truncated to four places after the decimal point (for example, 0.1234).
[§63.5758(a)(1)(i)]
- 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 they obtain prior approval by the Director. 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, the permittee does 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, the permittee may use the values for organic HAP content that are listed in Table 5 or 6 below. The permittee may use Table 6 only if the solvent blends in the materials do not match any of the solvent blends in Table 5 and the permittee knows only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6, then the test results must be used for determining compliance. [§63.5758(a)(6)]

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

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.

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

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 Naphtha, 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.

- 1) 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 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)]e
 - 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)]

$$Solids = 1 - \frac{m_{volatiles}}{D_{avg}} \quad (Eq. 4)$$

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.

- 2) 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)]

Monitoring/Recordkeeping:

- 1) The permittee must keep a copy of each notification and report that is submitted to comply with Subpart VVVV. [§63.5767(a)]
- 2) The permittee must keep all documentation supporting any notification or report that the permittee submitted. [§63.5767(b)]
- 3) The permittee must keep records specified in §63.5767(c)(2) and (3). [§63.5767(c)]
 - a) 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)]
 - b) 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)]
- 4) All of the permittee’s records must be readily available and in a form so they can be easily inspected and reviewed. [§63.5770(a)]
- 5) The permittee must keep each record for 5 years following the date that each record is generated. [§63.5770(b)]
- 6) The permittee must keep each record on site for at least 2 years after the date that each record is generated. The permittee can keep the records offsite for the remaining 3 years. [§63.5770(c)]
- 7) 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)]

Reporting:

- 1) The permittee must submit all of the notifications in Table 7 below that apply to the installation by the dates in the table. The notifications are described more fully in 40 CFR Part 63, Subpart A, General Provisions. [§63.5761(a)]

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

The permittee must submit—	By this date—
The notifications specified in §63.9(b) (3) to (5)	No later than the dates specified §63.9(b)(4) and (5).

- 2) If the permittee changes any information submitted in any notification, the permittee must submit the changes in writing to the Director within 15 calendar days after the change. [§63.5761(b)]
- 3) 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)]
- 4) Unless the Director 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)]
 - a) Each subsequent compliance report must cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. [§63.5764(b)(3)]
 - b) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period. [§63.5764(b)(4)]
 - c) 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)]
- 5) The compliance report must include the information specified in §63.6764(c)(1) through (7). [§63.5764(c)]

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- a) Company name and address. [§63.5764(c)(1)]
 - b) 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)]
 - c) The date of the report and the beginning and ending dates of the reporting period. [§63.5764(c)(3)]
 - d) A description of any changes in the manufacturing process since the last compliance report. [§63.5764(c)(4)]
 - e) 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 this installation is 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 12-month averaging periods that end during the reporting period. [§63.5764(c)(5)]
 - f) If the permittee was in compliance with the emission limits and work practice standards during the reporting period, the permittee must include a statement to that effect. [§63.5764(c)(6)]
 - g) If the permittee deviated from an emission limit or work practice standard during the reporting period, the permittee must also include the information listed in §63.5764(c)(7)(i) through (iv) in the semiannual compliance report. [§63.5764(c)(7)]
 - i) A description of the operation involved in the deviation. [§63.5764(c)(7)(i)]
 - ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation. [§63.5764(c)(7)(ii)]
 - iii) A description of any corrective action the permittee took to minimize the deviation and actions the permittee have taken to prevent it from happening again. [§63.5764(c)(7)(iii)]
 - iv) A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [§63.5764(c)(7)(iv)]
 - 6) The permittee shall report any exceedance of any limitation imposed by this permit condition, or any malfunction which could cause an exceedance of this permit condition, no later than ten (10) days after the exceedance or event causing the exceedance.
 - 7) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and in the annual compliance certification required by Section V of this permit.
 - 8) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

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.

PERMIT CONDITION 022015-004					
10 CSR 10-6.060 Construction Permits Required					
Construction Permit No. 022015-004, Issued February 4, 2015					
Emission Unit	Description	MHDR	Material & Amount (gallons)	Control Device	
				No.	Description
EP-01A	Gluing Operations (Assembly Line): #348 Waterbase Adhesive	2.655 gallons = 9 boats	23,258	N/A	
	Gluing Operations (Assembly Line): VA 332 Adhesive		39,464		
EP-01B	Gluing Operations (HEPA filter): VA 332 Adhesive	1.85 gallons = 9 boats	39,464	C-1M	HEPA Filter
EP-06A & B	Gasoline Storage Tank- 2,000 gal capacity	0.825 gallons	7,227	N/A	
EP-09	Plywood Cutting - Sawdust	0.285 ton	N/A	1	Cyclone
EP-10(3)A-1	Paint Booth #3 – Touchup Paint: All colors	0.15 gallons	1,314	C-1 G-H	MAT Filter
EP-10(3)A-2	Paint Booth #3 – Primer	0.01 gallons	88		
EP-10(3)B	Paint Booth #3 – Camouflage	0.85 gallons = 1 boat	7,446		
EP-11(1)	Plasma Cutter – 875.2 in/boat	3 boats = 25,800 in	N/A	C-1N	HEPA Filter
EP-11(2)	Plasma Cutter – 6,255.2 in/boat	2 boats = 14,056 in	N/A		
EP-11(3)	Plasma Cutter – 3,700 in/boat	2 boats = 7,400 in	N/A		
EP-11(5)	Plasma Cutter – 2,400 in/boat	3 boats = 7,200 in	N/A		
EP-11(6)	Plasma Cutter – 3,700 in/boat	3 boats = 11,100 in	N/A		
EP-13A	Flotation Foaming – Blowing Agent	4.23 gallons = 9 boats	27, 215	N/A	
EP-13B	Flotation Foaming – Flotation Foam	74.25 gallons = 9 boats	585,278	N/A	
EP-14	Pontoon Boat Touchup Spray Painting: 177885 Anodized Aluminum	0.14 gal = 1.2 12oz cans	1,226	N/A	
EP-17	Powder Coat Booth #1	0.075 ton	N/A	C-1S	Baghouse

PERMIT CONDITION 022015-004					
10 CSR 10-6.060 Construction Permits Required					
Construction Permit No. 022015-004, Issued February 4, 2015					
Emission Unit	Description	MHDR	Material & Amount (gallons)	Control Device	
				No.	Description
EP-19	Powder Coat Booth #2	0.075 ton	N/A		
EP-21	Clear Powder Coat Booth	0.075 ton	N/A		
EP-29	Toluene Cleaner	0.275 gallons	2,409	N/A	

Operational Limitations:

- 1) The permittee shall not handle material in excess of the amounts listed in the table above for each corresponding emission unit per consecutive 12-month period. [Special Condition 3.A.]
- 2) The permittee shall control particulate emissions from the emission sources listed in the table above using their corresponding control devices. [Special Conditions 4.A. & 5.A.]
- 3) 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. [Special Condition 4.B.]
- 4) The permittee shall keep replacement filters on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 4.C.]
- 5) When considering the use of an alternative material that is different than the materials listed in the table below, the permittee shall compare the SDS for the new material to the maximum permitted values for the corresponding permitted material. [Special Condition 7.A]
- 6) The permittee 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 the table below. [Special Condition 7.B]

Maximum Permitted Material Contents

Emission Unit	Material	VOC (lb/gal)	Individual HAPs (lb/gal)
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

Emission Unit	Material	VOC (lb/gal)	Individual HAPs (lb/gal)
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

Monitoring/Recordkeeping:

- 1) Attachment B or equivalent form, such as an electronic form, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Operational Limitation 1). [Special Condition 3.B.]
- 2) The permittee shall monitor and record the operating pressure drop across the dust collectors and filters at least once every 24 hours using Attachment C or an equivalent. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty. [Special Condition 4.D.]
- 3) The permittee shall maintain a copy of the manufacturer’s performance warranty for the dust collectors and filters on site. [Special Condition 4.E.]
- 4) The permittee shall maintain an operating and maintenance log for the dust collectors and filters, using Attachment D or an equivalent, which shall include the following: [Special Condition 4.F.]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 5) The permittee shall conduct visible emissions monitoring of the cyclone at least once every 24 hours of operation. Visible emissions monitoring shall be conducted using the EPA Test Method 22 procedures under Attachment E. If visible emissions are present, the permittee 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: [Special Condition 5.B.]
 - a) Inspection of the solids discharge valve for proper operation
 - b) Inspection of the structural components including the cyclone ductwork and hood for leaks and/or component failure.
 - c) 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.
 - d) Cleaning of the cyclone inlet vanes

- 6) The permittee shall maintain an operating and maintenance log for the cyclones, using Attachment D or an equivalent, which shall include the following: [Special Condition 5.C.]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions;
 - b) Visible emission observations; and
 - c) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 7) The permittee shall calculate monthly and 12-monthly rolling total VOC emissions from all alternate materials and include the calculation in Attachment F. [Special Condition 7.C]
- 8) Alternate materials shall comply with the 12-month rolling total usage limits in the table above for the material being replace. [Special Condition #7.D]
- 9) The permittee shall maintain SDS for all alternative materials. [Special Condition 7.E]
- 10) 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. These records shall include MSDS for all materials used. [Special Condition 8.A.]

Reporting:

- 1) The permittee shall report any exceedance of any limitation imposed by this permit condition, or any malfunction which could cause an exceedance of this permit condition, no later than ten (10) days after the exceedance or event causing the exceedance.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and in the annual compliance certification required by Section V of this permit.
- 3) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. [Special Condition 8.B.]

PERMIT CONDITION 6.220	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Unit	Description
EP-01A	Gluing Operations (Assembly Line)
EP-01B	Gluing Operations (HEPA Filter)
EP-09	Plywood Cutting (Sawdust)
EP-10(3)A-1	Paint Booth #3 – Touchup Paint
EP-10(3)A-2	Paint Booth #3 – Primer
EP-10(3)B	Paint Booth #3 – Camouflage
EP-11(1)	Plasma Cutter – 875.2 in/boat
EP-11(2)	Plasma Cutter – 6,255.2 in/boat
EP-11(3)	Plasma Cutter – 3,700 in/boat
EP-11(5)	Plasma Cutter – 2,400 in/boat
EP-11(6)	Plasma Cutter – 3,700 in/boat
EP-12(3)	Drying Oven for Paint Booth #3
EP-14	Pontoon Boat Touchup Spray Painting
EP-15	Acid Wash System
EP-16	Dry-off Oven
EP-17	Powder Coat Booth #1
EP-18	Infrared Oven #1
EP-19	Powder coat Booth #2
EP-20	Infrared Oven #2
EP-21	Clear Powder Coat Booth
EP-22	Powder Coat Cure Oven
EP-23	Make-up Air units (4)
EP-25	Infrared Space Heaters
EP-26	Burn-off Oven
EP-28	Convection Oven
EP-30E	Touch-up Paint Booth

Emission Limitation:

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]
- 2) Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 60 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]
- 3) Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

Monitoring:

- 1) Monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
 - i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
 - (1) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
- 2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
- 3) Observations are only required when the emission units are operating and when the weather conditions allow.
- 4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
- 5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
- 6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results for each emission unit using Attachments D, E, and H or equivalent forms.
- 2) The permittee shall make these records available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3) The permittee shall retain all records for five years.

Reporting:

- 1) The permittee shall report any exceedance of any limitation imposed by this permit condition, or any malfunction which could cause an exceedance of this permit condition, no later than ten (10) days after the exceedance or event causing the exceedance.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and in the annual compliance certification required by Section V of this permit.
- 3) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. [Special Condition #8.B.]

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 are only excerpts from the regulation or code, and are 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) 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.

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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
- 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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

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.

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) 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.
- 3) 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.

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 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

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. This odor evaluation shall be taken at a location outside of the installation's property boundary.

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.

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

This is a State Only permit requirement.

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.

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 at an installation:
 - 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”;
 - 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.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

- 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 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.

- c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
- d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained 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.*

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, 10 CSR 10-6.065(6)(E)3.C 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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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

- 1) Record Keeping
 - 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, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
 - 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.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. 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 semiannual report shall be reported on the schedule specified in this permit.
- 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)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

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 semiannually (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, Compliance and 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 applicable 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, Compliance and 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), record keeping, 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, Compliance and 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 APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP 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 APCP 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 permit, 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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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)34 Responsible Official

The application utilized in the preparation of this permit was signed by Dan Hoy, Director of Facilities, Bass Pro Shops. 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 shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) 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) MoDNR 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) MoDNR 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

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 A

VOC Compliance Worksheet

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

Natural Gas Combustion Emissions			
Emission Source	Monthly Usage (MMscf)	Emission Factor ¹ (lb/MMscf)	Emissions ² (tons/month)
EP-12(3) Drying Oven for Paint Booth #3		5.5	
EP-15 Acid Wash System		5.5	
EP-16 Dry-Off Oven		5.5	
EP-18 Infrared Oven #1		5.5	
EP-20 Infrared Oven #2		5.5	
EP-22 Powder Coat Cure Oven		5.5	
EP-23 Make-up Air Units (4)		5.5	
EP-25 Infrared Space Heaters		5.5	
EP-26 Burn-Off Oven		5.5	
EP-28 Convection Oven		5.5	
Paint/Solvent/Adhesive/Foam Emissions			
Material	Monthly Usage (gal)	Emission Factor ¹ (lb/gal)	Emissions ² (tons/month)
VA 332 Adhesive (EP-01A & EP-01B)		4.10	
#348 Waterbase Adhesive (EP-01A)		4.05	
PPG Touchup Paints – all colors (EP-10(3)A-1)		5.53	
Touchup Paint – clear (EP-10(3)A-1)		4.41	
No-Glare Charcoal Green Camo (EP-10(3)B)		4.78	
No-Glare Marsh Grass Camo (EP-10(3)B)		4.80	
No-Glare Mud Brown Camo (EP-10(3)B)		4.80	
Pewter Wash Primer Base (EP-10(3)A-2)		5.94	
Ecomate Blowing Agent (EP-13A)		0.73	
Touch ‘n Foam (EP-13C)		1.44	
177885 Anodized Aluminum (EP-14)		5.07	
Toluene (EP-29)		7.26	
Touch Up Paint Booth (EP-30E)			
Tank Emissions			
Emission Source	Monthly Usage (Mgal)	Emission Factor ¹ (lb/Mgal)	Emissions ² (tons/month)
EP-06A & B Gasoline Storage Tank		10	
EP-07A & B Diesel Storage Tank		0.02	
Monthly Start-Up, Shutdown, and Malfunction VOC Emissions (ton/month) ³ :			
Installation Monthly Usage Emissions ⁴ (tons/month):			
12-Month Rolling Total Installation Emissions ⁵ (tpy):			

¹ Emission factors obtained from Construction Permit No. 022015-004 when listed. See the following page for emission factor sources and determinations, as obtained from Construction Permit No. 022015-004. For EP-30E, list maximum density of any material used.

² Emissions (tons/month) = Monthly Usage x Emission Factor x 0.0005.

³ As reported to the Air Pollution Control Program’s Compliance/Enforcement section for compliance with 10 CSR 10-6.050.

⁴ Installation Monthly Usage Emissions (tons/month) = the sum of all combustion source emissions, paint/solvent/adhesive emissions, and tank emissions for the month.

⁵ **12-Month Rolling total Installation Emissions (tpy) = the sum of the most recent 12 months’ Installation Monthly Usage Emissions + 0.005 tons. The 0.005 tons represents annual breathing losses from the gasoline and diesel storage tanks.** The installation is in compliance with Emission Limitation in Permit Condition VOC if 12-Month Rolling Total Installation Emissions are less than 250.0 tpy VOC.

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. Permit Condition 022015-004, Operational Limitation 5) 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 Permit Condition 022015-004 Operational Limitation 2).

A particulate control efficiency of 99% was included in emission calculations for EP-01B for the use of a HEPA filter as required by Permit Condition 022015-004, Operational Limitation 2).

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 Permit Condition 022015-004, Operational Limitation 2).

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 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 Permit Condition 022015-004, Operational Limitation 2).

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 Permit Condition 022015-004, Operational Limitation 2).

Attachment B

Material Usage Compliance Worksheet – 022015-004

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

Emission Unit	Permitted Material	Alternative Material	Monthly Usage (gal)	12-Month Rolling Total Usage ⁶ (gal/yr)	Limit (gal/yr)
EP-01A	#348 Waterbase Adhesive				23,258
EP-01A & EP-01B	VA 332 Adhesive				39,464
EP-06A & B	Gasoline				7,227
EP-10(3)A-1	PPG Touchup Paints – all colors				1,314
EP-10(3)A-2	Pewter Wash Primer Base				88
EP-10(3)B	Camouflage Paints (Mud Brown, Marsh Grass, & Charcoal Green)				7,446
EP-13A	Ecomate Blowing Agent				27,215
EP-13B	Flotation Foam				585,278
EP-14	177885 Anodized Aluminum				1,226
EP-29	Toluene				2,409

⁶ 12-Month Rolling Total Usage (gal/yr) = the sum of the most recent 12 months' Monthly Usage (gal). 12-Month Rolling Total Usage (gal/yr) below the Limit (gal/yr) indicates compliance with Operational Limitation 1) in Permit Condition 022015-004.

-
- A. Record the all individual HAPs from this single coating MSDS.
 - B. Compare the HAP to Attachment F (also available at <http://www.dnr.mo.gov/env/apcp/permits/constpmtguide.htm> as *Table of Hazardous Air Pollutants, Screening Model Action Levels and Risk Assessment Levels*) for verification as particulate matter.
 - C. Record the maximum weight percent of each HAP from the MSDS.
 - D. The maximum application rate is 1.587 lbs of coating per hour. If the maximum application rate is exceeded, seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.
 - E. The overall PM control efficiency includes the HVLP transfer efficiency (65%), booth capture efficiency (100%), and exhaust filter control efficiency (99%): $65\% + (1 - 65\%) \times 100\% \times 99\% = 94.925\%$.
 - F. If column B states yes, calculate the particulate matter HAP potential to emit: $F = C \times D \times (1 - E)$. Otherwise calculate the volatile HAP potential to emit: $F = C \times D$. If the individual HAP potential to emit in column F is greater than the 0.5 pounds per hour, seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.
 - G. Calculate the PM HAP potential to emit in tons per year: $G = F \times 8,760 \text{ (hours/year)} / 2,000 \text{ (pounds/ton)}$.
 - H. Record the individual HAP SMAL from the Attachment G. If the individual HAP potential to emit in column G is greater than the SMAL, seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.
 - I. Record or calculate the coating's VOC weight % from the MSDS. Verify VOC status according to 10 CSR 10-6.020 *Definitions and Common Reference Tables (2)(V)13*.
Calculate the VOC potential to emit: $J = D \times I \times 8,760 \text{ (hours/year)} / 2,000 \text{ (pounds/ton)}$. If the VOC potential to emit is greater than 12.05 tons per year, seek approval from the Air Pollution Control Program New Source Review

Attachment G

SMAL values

Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
ACETALDEHYDE	75-07-0	9		Y	N	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N
ACETAMIDE	60-35-5	1		Y	N	CHLOROPRENE	126-99-8	1		Y	N
ACETONITRILE	75-05-8	4		Y	N	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y
ACETOPHENONE	98-86-2	1		Y	N	CHROMIUM COMPOUNDS		5	L	N	Y
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CHRYSENE	218-01-9	0.01	V	Y	N
ACROLEIN	107-02-8	0.04		Y	N	COBALT COMPOUNDS		0.1	M	N	Y
ACRYLAMIDE	79-06-1	0.02		Y	N	COKE OVEN EMISSIONS	8007-45-2	0.03	N	Y	N
ACRYLIC ACID	79-10-7	0.6		Y	N	CRESOL, [META-]	108-39-4	1	B	Y	N
ACRYLONITRILE	107-13-1	0.3		Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N
ALLYL CHLORIDE	107-05-1	1		Y	N	CRESOL, [PARA-]	106-44-5	1	B	Y	N
AMINOBIIPHENYL, [4-]	92-67-1	1	V	Y	N	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N
ANILINE	62-53-3	1		Y	N	CUMENE	98-82-8	10		Y	N
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N
ANTHRACENE	120-12-7	0.01	V	Y	N	DDE	72-55-9	0.01	V	Y	Y
ANTIMONY COMPOUNDS		5	H	N	Y	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	DIAZOMETHANE	334-88-3	1		Y	N
ANTIMONY TRIOXIDE	1309-64-4	1	H	N	Y	DIBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	DIOXINS/FURANS		6E-07	D,V	Y	N
ARSENIC COMPOUNDS		0.005	I	N	Y	DIBENZOFURAN	132-64-9	5	V	Y	N
ASBESTOS	1332-21-4	0	A	N	Y	DIBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N
BENZ(A)ANTHRACENE	56-55-3	0.01	V	Y	N	DIBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N
BENZENE	71-43-2	2		Y	N	DIBUTYL PHTHALATE	84-74-2	10		Y	Y
BENZIDINE	92-87-5	0.0003	V	Y	N	DICHLOROENZENE, [1,4-]	106-46-7	3		Y	N
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	DICHLOROENZIDENE, [3,3-]	91-94-1	0.2	V	Y	Y
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	DICHLOROETHANE, [1,2-]	107-06-2	0.8		Y	N
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N
BENZYL CHLORIDE	100-44-7	0.1		Y	N	DICHLOROMETHANE	75-09-2	10		N	N
BERYLLIUM COMPOUNDS		0.008	J	N	Y	DICHLOROPHENOXY ACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y
BERYLLIUM SALTS		2E-05	J	N	Y	DICHLOROPROPANE, [1,2-]	78-87-5	1		Y	N
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	DICHLOROPROPENE, [1,3-]	542-75-6	1		Y	N
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	DICHLORVOS	62-73-7	0.2		Y	N
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DIETHANOLAMINE	111-42-2	5		Y	N
BROMOFORM	75-25-2	10		Y	N	DIETHYL SULFATE	64-67-5	1		Y	N
BROMOMETHANE	74-83-9	10		Y	N	DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	5	P	Y	N
BUTADIENE, [1,3-]	106-99-0	0.07		Y	N	DIMETHOXYBENZIDINE, [3,3-]	119-90-4	0.1	V	Y	Y
BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N	DIMETHYL BENZIDINE, [3,3-]	119-93-7	0.008	V	Y	Y
BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N	DIMETHYL CARBAMOYL CHLORIDE	79-44-7	0.02		Y	N
CADMIUM COMPOUNDS		0.01	K	N	Y	DIMETHYL FORMAMIDE	68-12-2	1		Y	N
CALCIUM CYANAMIDE	156-62-7	10		Y	Y	DIMETHYL HYDRAZINE, [1,1-]	57-14-7	0.008		Y	N
CAPROLACTAM (Delisted)	105-60-2					DIMETHYL PHTHALATE	131-11-3	10		Y	N
CAPTAN	133-06-2	10		Y	Y	DIMETHYL SULFATE	77-78-1	0.1		Y	N
CARBARYL	63-25-2	10	V	Y	Y	DIMETHYLAMINOAZOBENZENE, [4-]	60-11-7	1		Y	N
CARBON DISULFIDE	75-15-0	1		Y	N	DIMETHYLANILINE, [N-N-]	121-69-7	1		Y	N

Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
CARBON TETRACHLORIDE	56-23-5	1		Y	N	DINITRO-O-CRESOL, [4,6-] (Note 6)	534-52-1	0.1	E	Y	Y
CARBONYL SULFIDE	463-58-1	5		Y	N	DINITROPHENOL, [2,4-]	51-28-5	1		Y	N
CATECHOL	120-80-9	5		Y	N	DINITROTOLUENE, [2,4-]	121-14-2	0.02		Y	N
CHLORAMBEN	133-90-4	1		Y	Y	DIOXANE, [1,4-]	123-91-1	6		Y	N
CHLORDANE	57-74-9	0.01		Y	Y	DIPHENYLHYDRAZINE, [1,2-]	122-66-7	0.09	V	Y	Y
CHLORINE	7782-50-5	0.1		N	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]	101-68-8	0.1	V	Y	N
CHLOROACETIC ACID	79-11-8	0.1		Y	N	EPICHLOROHYDRIN	106-89-8	2		Y	N
CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N	ETHOXYETHANOL, [2-]	110-80-5	10	P	Y	N
CHLOROBENZENE	108-90-7	10		Y	N	ETHOXYETHYL ACETATE, [2-]	111-15-9	5	P	Y	N
CHLOROBENZILATE	510-15-6	0.4	V	Y	Y	ETHYL ACRYLATE	140-88-5	1		Y	N
CHLOROFORM	67-66-3	0.9		Y	N	ETHYL BENZENE	100-41-4	10		Y	N
ETHYL CHLORIDE	75-00-3	10		Y	N	NITROBENZENE	98-95-3	1		Y	N
ETHYLENE GLYCOL	107-21-1	10		Y	N	NITROBIPHENYL, [4-]	92-93-3	1	V	Y	N
ETHYLENE GLYCOL MONOBUTYL ETHER (Delisted)	111-76-2					NITROPHENOL, [4-]	100-02-7	5		Y	N
ETHYLENE GLYCOL MONOHEXYL ETHER	112-25-4	5	P	Y	N	NITROPROPANE, [2-]	79-46-9	1		Y	N
ETHYLENE IMINE [AZIRIDINE]	151-56-4	0.003		Y	N	NITROSODIMETHYLAMINE, [N-]	62-75-9	0.001		Y	N
ETHYLENE OXIDE	75-21-8	0.1		Y	N	NITROSOMORPHOLINE, [N-]	59-89-2	1		Y	N
ETHYLENE THIOUREA	96-45-7	0.6		Y	Y	NITROSO-N-METHYLUREA, [N-]	684-93-5	0.0002		Y	N
FORMALDEHYDE	50-00-0	2		Y	N	OCTACHLORONAPHTHALENE	2234-13-1	0.01	V	Y	N
GLYCOL ETHER (ETHYLENE GLYCOL ETHERS)		5	P	Y	N	PARATHION	56-38-2	0.1		Y	Y
GLYCOL ETHER (DIETHYLENE GLYCOL ETHERS)		5	P	Y	N	PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y
HEPTACHLOR	76-44-8	0.02		Y	N	PENTACHLORONITROBENZENE	82-68-8	0.3		Y	N
HEXACHLOROBENZENE	118-74-1	0.01		Y	N	PENTACHLOROPHENOL	87-86-5	0.7		Y	N
HEXACHLOROBUTADIENE	87-68-3	0.9		Y	N	PHENOL	108-95-2	0.1		Y	N
HEXACHLOROCYCLOHEXANE, [ALPHA-]	319-84-6	0.01	F	Y	N	PHENYLENEDIAMINE, [PARA-]	106-50-3	10		Y	N
HEXACHLOROCYCLOHEXANE, [BETA-]	319-85-7	0.01	F	Y	N	PHOSGENE	75-44-5	0.1		Y	N
HEXACHLOROCYCLOHEXANE, [DELTA-]	319-86-8	0.01	F	Y	N	PHOSPHINE	7803-51-2	5		N	N
HEXACHLOROCYCLOHEXANE, [TECHNICAL]	608-73-1	0.01	F	Y	N	PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N
HEXACHLOROCYCLOPENTADIENE	77-47-4	0.1		Y	N	PHTHALIC ANHYDRIDE	85-44-9	5		Y	N
HEXACHLOROETHANE	67-72-1	5		Y	N	POLYCYLIC ORGANIC MATTER		0.01	V	Y	N
HEXAMETHYLENE, -1,6-DIISOCYANATE	822-06-0	0.02		Y	N	PROPANE SULFONE, [1,3-]	1120-71-4	0.03		Y	Y
HEXAMETHYLPHOSPHORAMIDE	680-31-9	0.01		Y	N	PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N
HEXANE, [N-]	110-54-3	10		Y	N	PROPIONALDEHYDE	123-38-6	5		Y	N
HYDRAZINE	302-01-2	0.004		N	N	PROPOXUR [BAYGON]	114-26-1	10		Y	Y
HYDROGEN CHLORIDE	7647-01-0	10		N	N	PROPYLENE OXIDE	75-56-9	5		Y	N
HYDROGEN FLUORIDE	7664-39-3	0.1		N	N	PROPYLENEIMINE, [1,2-]	75-55-8	0.003		Y	N
HYDROQUINONE	123-31-9	1		Y	N	QUINOLINE	91-22-5	0.006		Y	N
INDENO(1,2,3CD)PYRENE	193-39-5	0.01	V	Y	N	QUINONE	106-51-4	5		Y	N
ISOPHORONE	78-59-1	10		Y	N	RADIONUCLIDES		Note 1	Y	N	Y
LEAD COMPOUNDS		0.01	Q	N	Y	SELENIUM COMPOUNDS		0.1	W	N	Y
LINDANE [GAMMA- HEXACHLOROCYCLOHEXANE]	58-89-9	0.01	F	Y	N	STYRENE	100-42-5	1		Y	N
MALEIC ANHYDRIDE	108-31-6	1		Y	N	STYRENE OXIDE	96-09-3	1		Y	N
MANGANESE COMPOUNDS		0.8	R	N	Y	TETRACHLORODIBENZO-P-DIOXIN,[2,3,7,8]	1746-01-6	6E-07	D,V	Y	Y
MERCURY COMPOUNDS		0.01	S	N	N	TETRACHLOROETHANE, [1,1,2,2-]	79-34-5	0.3		Y	N
METHANOL	67-56-1	10		Y	N	TETRACHLOROETHYLENE	127-18-4	10		N	N
METHOXYCHLOR	72-43-5	10	V	Y	Y	TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N
METHOXYETHANOL, [2-]	109-86-4	10	P	Y	N	TOLUENE	108-88-3	10		Y	N
METHYL CHLORIDE	74-87-3	10		Y	N	TOLUENE DIISOCYANATE, [2,4-]	584-84-9	0.1		Y	N
METHYL ETHYL KETONE (Delisted)	78-93-3					TOLUIDINE, [ORTHO-]	95-53-4	4		Y	N
METHYL HYDRAZINE	60-34-4	0.06		Y	N	TOXAPHENE	8001-35-2	0.01		Y	N

Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
METHYL IODIDE	74-88-4	1		Y	N	TRICHLOROENZENE, [1,2,4-]	120-82-1	10		Y	N
METHYL ISOBUTYL KETONE	108-10-1	10		Y	N	TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N
METHYL ISOCYANATE	624-83-9	0.1		Y	N	TRICHLOROETHANE, [1,1,2-]	79-00-5	1		Y	N
METHYL METHACRYLATE	80-62-6	10		Y	N	TRICHLOROETHYLENE	79-01-6	10		Y	N
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N	TRICHLOROPHENOL, [2,4,5-]	95-95-4	1		Y	N
METHYLCYCLOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y	TRICHLOROPHENOL, [2,4,6-]	88-06-2	6		Y	N
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y	TRIETHYLAMINE	121-44-8	10		Y	N
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N	TRIFLURALIN	1582-09-8	9		Y	Y
METHYLNAPHTHALENE, [2-]	91-57-6	0.01	V	Y	N	TRIMETHYLPENTANE, [2,2,4-]	540-84-1	5		Y	N
MINERAL FIBERS		0	T	N	Y	URETHANE [ETHYL CARBAMATE]	51-79-6	0.8		Y	N
NAPHTHALENE	91-20-3	10	V	Y	N	VINYL ACETATE	108-05-4	1		Y	N
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N	VINYL BROMIDE	593-60-2	0.6		Y	N
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N	VINYL CHLORIDE	75-01-4	0.2		Y	N
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y	XYLENE, [META-]	108-38-3	10	G	Y	N
NICKEL COMPOUNDS		1	U	N	Y	XYLENES (MIXED ISOMERS)	1330-20-7	10	G	Y	N
NICKEL REFINERY DUST		0.08	U	N	Y						
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y						

Legend	
Group ID	
A	Asbestos
B	Cresols/Cresylic Acid (isomers and mixtures)
C	2,4 - D, Salts and Esters
D	Dibenzofurans, Dibenzodioxins
E	4, 6 Dinitro-o-cresol, and Salts
F	Lindane (all isomers)
G	Xylenes (all isomers and mixtures)
H	Antimony Compounds
I	Arsenic Compounds
J	Beryllium Compounds
K	Cadmium Compounds
L	Chromium Compounds
M	Cobalt Compounds
N	Coke Oven Emissions
O	Cyanide Compounds
P	Glycol Ethers
Q	Lead Compounds (except elemental Lead)
R	Manganese Compounds
S	Mercury Compounds
T	Fine Mineral Fibers
U	Nickel Compounds
V	Polycyclic Organic Matter
W	Selenium Compounds
X	Polychlorinated Biphenyls (Aroclors)
Y	Radionuclides
Notes	The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million

Attachment H

Method 9 Opacity Observations									
Installation Name:						Sketch of the observer's position relative to the emission unit			
Emission Point:									
Emission Unit:									
Observer Name and Affiliation:									
Observer Certification Date:									
Method 9 Observation Date:									
Height of Emission Point:									
Time:						Start of observations	End of observations		
Distance of Observer from Emission Point:									
Observer Direction from Emission Point:									
Approximate Wind Direction:									
Estimated Wind Speed:									
Ambient Temperature:									
Description of Sky Conditions (Presence and color of clouds):									
Plume Color:									
Approximate Distance Plume is Visible from Emission Point:									
Minute	Seconds				1-minute Avg. % Opacity ⁷	6-minute Avg. % Opacity ⁸	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
	Opacity Readings (% Opacity) ⁹								
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
7									
8									
9									
10									
11									
12									
13									

⁷ 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.

⁸ 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.

⁹ Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.

14									
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The emission unit is in compliance if each six-minute average opacity is less than or equal to 20%. Exception:
The emission unit is in compliance if one six-minute average opacity is greater than 20%, but less than 60%.

Was the emission unit in compliance at the time of evaluation (yes or no)? _____

Signature of Observer

STATEMENT OF BASIS

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 boats are 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 boats are assembled, including attaching the engine and fuel tanks to the main assembly. The final products are taken to an on-site storage yard to await shipping to customers. The installation is an operating permit major source for Hazardous Air Pollutants and for Volatile Organic Compounds. The installation is subject to 40 CFR Part 63, Subpart VVVV, *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*.

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, in tons per year

Pollutants	Potential Emissions ^A	Reported Emissions				
		2017	2016	2015	2014	2013
Particulate Matter ≤ Ten Microns (PM ₁₀)	31.22	6.95	6.96	16.91	30.18	18.38
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	31.22 ^B	6.95	6.96	16.91	30.18	17.75
Sulfur Oxides (SO _x)	0.09	0.00	0.00	0.00	0.00	0.00
Nitrogen Oxides (NO _x)	29.00	0.00	0.00	0.00	0.00	0.00
Volatile Organic Compounds (VOC)	<250 ^C	84.61	76.26	80.06	96.50	95.79
Carbon Monoxide (CO)	12.09	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	>10/25 ^D	12.21	10.62	8.02	8.20	5.35

^A All values were taken from Construction Permit No. 022015-004.

^B Construction Permit 022015-004 states not determined for the existing potential emissions and 9.17 tpy for potential emissions of the application. 9.17 tpy is less than the reported emissions from 2013 through 2015. Worst-case value of equaling PM₁₀'s potential emission rate is listed to account for the existing potential emissions.

^C Limited by Permit Condition VOC.

^D Potential emissions are major for HAPs (i.e. at least 10 tpy for individual HAPs and/or at least 25 tpy for combined HAPs).

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) Part 70 Operating Permit Application, received June 26, 2014;
- 2) 2017 Emissions Inventory Questionnaire, received April 30, 2018;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) WebFIRE; and
- 5) All documents listed under Construction Permit History section.

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.

None.

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.

10 CSR 10-6.100, *Alternate Emission Limits*

This regulation was rescinded from the code of state regulations (CSR) on Sept. 30, 2018 and is not contained in Missouri’s State Implementation Plan (SIP).

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

The following table details all emission points at the installation and the exemptions that apply to each of them under 10 CSR 10-6.400(1)(B) as well as necessary data used to make the determinations.

Emission Unit	MHDR (unit/hr)	Emission Factor ¹⁰ (lb PM/unit)	Uncontrolled PM Emission Rate (lb/hr)	Control Efficiency (%)	Exemption [under (1)(B)]	Exemption Reason
EP-01A	2.655 gal	4.95	0.45	-	16.	Uncontrolled PTE < 0.5 lb/hr
EP-01B	1.85 gal	2.82	5.22	99.00	15.	Contr. Eff. > 90%
EP-08A	0.0125 1000 lb	24.1	0.30	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-08B	0.0152 1000 lb	10	0.15	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-09	0.285 ton	0.2	0.06	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-10(3)A-1	0.15 gal	3.43	0.18	95.00	14.	Coating Contr. Eff. > 95%
EP-10(3)B	0.85 gal	3.56	3.03	95.00	14.	Coating Contr. Eff. > 95%
EP-11(1)	25.8 1000 in	0.1005	2.59	99.00	15.	Contr. Eff. > 90%
EP-11(2)	14.06 1000 in	0.0819	1.15	99.00	15.	Contr. Eff. > 90%
EP-11(3)	7.4 1000 in	0.1005	0.74	99.00	15.	Contr. Eff. > 90%
EP-11(5)	7.2 1000 in	0.0819	0.59	99.00	15.	Contr. Eff. > 90%
EP-11(6)	11.1 1000 in	0.1005	1.12	99.00	15.	Contr. Eff. > 90%
EP-12(3)	0.0015 MMScf	7.6	0.01	-	6.	Uncontrolled PTE < 0.5 lb/hr

¹⁰ Emission factors taken from Construction Permit No. 022015-004.

Emission Unit	MHDR (unit/hr)	Emission Factor ¹⁰ (lb PM/unit)	Uncontrolled PM Emission Rate (lb/hr)	Control Efficiency (%)	Exemption [under (1)(B)]	Exemption Reason
EP-14	0.14 gal	1.158	0.16	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-15	0.0039 MMScf	7.6	0.03	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-16	0.0016 MMScf	7.6	0.01	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-17	0.025 ton	140	3.50	98.00	14.	Coating Contr. Eff. > 95%
EP-18	0.0007 MMScf	7.6	0.01	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-19	0.025 ton	140	3.50	98.00	14.	Coating Contr. Eff. > 95%
EP-20	0.0007 MMScf	7.6	0.01	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-21	0.025 ton	140	3.50	98.00	14.	Coating Contr. Eff. > 95%
EP-22	0.0031 MMScf	7.6	0.02	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-23	0.0112 MMScf	7.6	0.09	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-25	0.0047 MMScf	7.6	0.04	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-26	0.0009 MMScf	7.6	0.01	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-28	0.0023 MMScf	7.6	0.02	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-29	0.00027 MMScf	7.6	0.00	-	12.	Uncontrolled PTE < 0.5 lb/hr
EP-30E	0.025 gal	8.93	0.03	-	12.	Uncontrolled PTE < 0.5 lb/hr
Haul Roads	Not Determined				7.	Fugitive Source

Paint Booth emission points relied upon transfer efficiencies and solid weight percentages to calculate their corresponding Uncontrolled PM Emission Rates. These are outlined in the table below:

Emission Point	Transfer Efficiency (%)	Solid Weight (%)
EP-01A	95	69.0
EP-10(3)A-1	65	100.0
EP-30E	65	43.1

EP-01A Gluing Operations (assembly line)

The gluing operation (assembly line) has a maximum hourly design rate of 2.655 gallons per hour and an emission factor of 4.95 pounds per gallon. A transfer efficiency of 95% was applied for the electrostatic disk spray application to a flat surface from Table 5-7 of APTI Course 482. The assembly line has the maximum hourly design rate to process 3,344.67 pounds per hour of aluminum and 350.52 pounds per hour of carpet. Accounting for the aluminum, carpet, and gluing operation the process weight is 1.85 tons per hour. Using the equation in 10 CSR 10-6.400(3)(A)1:

$$E = 4.1 * P^{0.67} = 4.1 * 1.85^{0.67} = 6.19 \frac{lbs}{hour}$$

Where E is the rate of emission in lb/hr and P is the process weight rate in tons/hr (i.e. MHDR)
The rate of emission is less than the Uncontrolled PM Emission Rate of 0.45 lb/hr.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating*

All equipment used for indirect heating located at the installation use only natural gas; therefore, the installation is exempt. [10 CSR 10-6.405(1)(E)]

Construction Permit History

The following is a brief history of construction permits for this installation:

- Construction Permit No. 0497-017, issued March 21, 1997
 - This permit was issued for the installation of the aluminum boat manufacturing installation. The installation obtained this permit as part of a remedial action, since the installation was constructed prior to receiving a permit from the Air Pollution Control Program. Several special conditions were associated with this permit, but have since been superseded by other construction permits.
- Construction Permit No. 0599-005, issued April 19, 1999
 - This permit was issued for the installation of a new paint booth. There were special conditions associated with the paint booth; however, the paint booth has since been removed from the installation.
- Construction Permit No. 042001-007, issued March 19, 2001
 - This permit was issued for an emissions increase of volatile organic compounds (VOC) emission restriction from 40 tons per year to 100 tons per year. This permit superseded Permit No. 0497-017 and all of its special conditions. This permit also continued the limit of HAP emission for 10 tons per year individually or 25 tons per year for all combined HAPs.
- Construction Permit No. 072003-017, issued July 14, 2003
 - This permit was issued for the installation of a new paint booth (EP-10). This permit superseded all special conditions found in Permit No. 042001-007. This permit established a limit of 250 tons of Volatile Organic Compounds (VOCs) from the installation. The installation was also limited to emit less than 10 tons individually or 25 tons combined of Hazardous Air Pollutants (HAPs). The permit also required the installation to use fabric filters on the paint booth to control PM₁₀.

- Construction Permit No. 022009-003, issued on February 5, 2009
 - This permit was issued for the installation of a heat treat oven (EP-11) that has since been removed and an addition to the paint booth (EP-10(1)). The special conditions of this permit superseded the special conditions found in Permit No. 072003-017A. This permit continued to limit VOCs to 250 tons in any consecutive 12-month period and limited HAPs to emit less than 10 tons individually or 25 tons combined from the installation in any consecutive 12-month period. The installation is required to keep solvents and cleaning solutions in sealed containers whenever the materials are not in use. Other special conditions were part of the permit, but the equipment they applied to have been removed from the installation.
- Construction Permit No. 082009-006, issued August 19, 2009
 - This permit was issued for the installation of a dual paint booth (EP-10(3)), single paint booth (EP-10(4)) that has since been removed, and plasma cutters (EP-11(1) and EP-11(2)). This permit has special conditions that included the superseding of Construction Permit No. 022009-003's Special Conditions 2 & 3. When using alternative coating in paint booths, the installation shall calculate the PTE of VOCs and gain approval from the Air Pollution Control Program before using the alternate material. Fabric filters shall be used to control PM₁₀ from the paint booth when in operation.
- Construction Permit No. 082009-006A, issued July 8, 2010
 - This permit was issued as an amendment to Permit No. 082009-006. After review, it was determined that Maximum Achievable Control Technology, Subpart III, *Nation Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production* is not applicable to the installation.
- Construction Permit No. 052013-001, issued May 7, 2013
 - This permit was issued for the installation of a powder coating system (EP-17, EP-19, and EP-21), a new wood router (EP-09), a burn-off oven (EP-26), and ancillary equipment (EP-14, EP-15, EP-16, EP-18, EP-20, EP-22, EP-25, EP-28, and EP-29). This permit supersedes all permit condition found in Permit No. 082009-006. A limit of 250 tons of VOCs in any consecutive 12-month period from the installation was continued. The powder coating operations shall use booths and filter media to control emissions. The installation is to keep solvent and cleaning solutions in sealed containers whenever the materials are not in use. When considering the use of alternative coating for paint booths, the installation shall calculate the PTE of VOC in the alternative material and seek approval from the Air Pollution Control Program in certain cases. The installation shall control PM₁₀ emissions from the paint booths using filters when they are in operation.
- Construction Permit No. 022015-004, issued February 4, 2015
 - This permit was issued for the installation of two plasma cutters (EP-11(5) and (6)), convection oven (EP-28), modification to existing dual sided paint booth (EP-10(3)), and a production increase by 25%. This permit has 8 special conditions:
 - Special Condition 1 supersedes all special conditions found in Permit 052013-001.
 - Special Condition 2 limits the installation at the time of issuance of the construction permit to emit no more than 250.0 tons of VOC in any consecutive 12-month period for the entire installation.
 - This condition does not appear in the operating permit because Permit Condition VOC requires a stricter limitation for the entire installation at the time of the issuance of the operating permit to emit no more than 250.0 tons of VOC in any consecutive 12-month period. This ensures the permittee continues to remain below the VOC major threshold for construction permits with the addition of EP-30E (as issued under No Construction Permit Required Project 2018-07-032).
 - This condition has not been modified to indicate that all emission units at the installation as listed Installation Equipment Listing to ensure the permittee continues to remain below the VOC major threshold for construction permits.
 - Special Condition 3 limits the installation in material handled during any consecutive 12 month period (PC 022015-004).

- Special Conditions 4 requires the installation to use dust collectors and/or filters on gluing operations, paint booths, plasma cutters, and powder coating operations (PC 022015-004).
- Special Condition 5 requires the installation to control particulate emissions from EP-09 Plywood Cutting using cyclones (PC 022015-004).
- Special Condition 6 requires the installation to keep all liquid paints, solvents, and adhesives in sealed containers whenever the materials are not in use (PC VOC).
- Special Condition 7 requires the installation to compare the SDS for alternative material to the maximum permitted values (PC 022015-004).
- Special Condition 8 is for standard recordkeeping and reporting requirements (PC VOC).

On Page 14, of the permit, there is a miscalculation. Under Specific Requirements, 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* is applicable to EP-01A, it states “EP-01A has a process weight of 23.9 tph resulting in a limit of 34.38 lb/hr.” This should state, “EP-01A has a process weight of 23.9 lb/hr resulting in a limit of 0.187 lb/hr.”

$$P = 23.9 \frac{lb}{hr} * \frac{1 ton}{2000 lb} = 0.01 \frac{ton}{hr}$$

$$E = 4.1 * P^{0.67}$$

$$E = 4.1 * 0.01^{0.67} = 0.187 \frac{lb}{hr}$$

- Construction Permit No. 122016-008, issued December 21, 2016
 - This permit was issued for the installation of three camouflage paint booths.
 - The installation has not installed these paint booths nor do they plan to within the two-year period allotted from the date of the permit’s issuance. If the permittee plans to install these paint booths after the two-year period, the permittee must apply for a new permit to construct.
 - The special conditions within this construction permit have not been applied within this operating permit nor are the emission points listed.
- No Construction Permit Required Project 2018-07-032, issued September 27, 2018
 - This project was for the installation of a touch-up paint booth (EP-30E).

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 Jun 11, 1973, and Prior to May 19, 1978*

This regulation is not applicable to the installation since the storage vessels do not contain any petroleum liquids as defined under this Subpart.

40 CFR Part 60, Subpart Ka, *Standards for Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

This regulation is not applicable to the installation since the storage vessels do not contain any petroleum liquids as defined under this Subpart.

40 CFR Part 60, Subpart Kb, *Standards for Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

This regulation is not applicable to the installation since the storage vessels have a maximum capacity of 2,000 gallons, which is less than 19,000 gallons.

Maximum Achievable Control Technology (MACT) Applicability

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 flexible foam or rebond foam products. The foam produced at this installation is 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 Test 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 VVVV, *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*

The installation is subject to this regulation and meets the definition of new source. The activities regulated are carpet and fabric adhesive operations and surface coating operations. The installation does not use any control equipment to control VOCs from HAPs. The installation does, however, use control equipment to control PMs from HAPs. This regulation appears in this operating permit as Permit Condition VVVV.

40 CFR Part 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

This regulation does not apply to any of the emission units at the installation that are combustion sources because they do not meet the definition of *Boiler* nor *Process Heater*.

40 CFR Part 63 Subpart CCCCC, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*

This regulation applies to gasoline dispensing facilities at area sources. The installation is a major source for Hazardous Air Pollutants; therefore, the 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 regulation applies to paint stripping and surface coating operations at area sources. The installation is a major source for Hazardous Air Pollutants; therefore, the regulation does not apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

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.

40 CFR Part 64 is not applicable. Permit Condition 022015-004 lists emission units that control PM emissions to comply with limitations within the permit condition. The control devices for these emission units are not used to comply with any PM standard.

Greenhouse Gas Emissions

This source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂ emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

Other Regulatory Determinations

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

This installation was initially constructed in 1983. All sources of visible air contaminants operating at this installation have been installed during or after 1983. Therefore, all sources of visible air contaminants meet the definition of a new emission unit for this regulation. The emission limitations for new sources have been included in Permit Condition 6.220.

Dismantled Emission Units

Emission Unit	Description
EP-03A	Toluene Thinner
EP-10(1)	Paint Booth #1
EP-10(2)	Paint Booth #2
EP-10(4)	Paint Booth #4
EP-10A(1) through (4)	Paint Booths #1 through #4 Toluene Wipe
EP-12(1)	Drying Oven for Paint Booth #1
EP-12(2)	Drying Oven for Paint Booth #2
EP-12(4)	Drying Oven for Paint Booth #4
EP-27	Acid Wipe Down

The gasoline and diesel storage tanks, EP-06 and EP-07 respectively, were replaced during the review period of this operating permit from original sizes of 300 gallons each to 2,000 gallons each.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed either in 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 APCP'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 APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

The draft Part 70 Operating Permit for Tracker Marine – Lebanon Plant (105-0046) was placed on public notice as of October 5, 2018 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notices.htm>.

The Air Pollution Control Program received comments from Ms. Amy Algoe-Eakin from EPA Region 7. The comments are addressed below in the order in which they appear within the letter(s).

Comment #: 1

The *Emission Limitation*, in *Plant Wide Emissions Limitation Permit Condition VOC* requires the permittee to emit less than 250.0 tons of volatile organic compounds (VOC) in any consecutive 12-month period for the entire installation. MoDNR indicates the authority for this emission limitation derives from Special Condition 2.A., in Permit to Construct #022015-004, issued February 4, 2015. However, Special Condition 2.A., in Permit to Construct #022015-004, limits VOC emissions from the entire installation *as listed in Table 3* (emphasis added) of the construction permit. However, the Installation Emission Source List, in Table 3 of Permit to Construct #022015-004, has not been included in *Permit Condition VOC* and the Installation Emission Source List in Table 3 does not match the list of Emission Units With Limitations as set forth in Section I: *Installation Equipment Listing*. Additionally, *Monitoring I Record keeping* requirement 1), *Permit Condition VOC*, requires the permittee to use Attachment A or equivalent forms approved by the Air Pollution Control Program, to demonstrate compliance with the emission limitation. MoDNR indicates the authority for *Monitoring I Recordkeeping* requirement 1) derives from Special Condition 2.B., in Permit to Construct #02215-004. 10 CSR 10-6.065(6)(C)l.A.(I) says "the permit shall specify and reference the origin of and authority for each term or condition and shall *identify any difference* (emphasis added) in form as compared to the applicable requirement upon which the term or condition is based." MoDNR has provided no explanation as to the differences between the emission units that comprise the entire installation specified in Permit to Construct #022015-004 and the emission units that comprise the entire installation in Permit Condition VOC, in this draft operating permit. Therefore, EPA believes that the Special Conditions incorporated from Permit to Construct #022015-004, in Permit Condition VOC should be identical, unless MoDNR provides a qualifying explanation. EPA recommends MoDNR consider resolving these differences.

Response to Comment:

Permit Condition VOC now includes citation "10 CSR 10-6.065 Operating Permits – Voluntary Limitation(s)" and the Emission Limitation citation has been changed from Construction Permit No. 022015-004's "Special Condition 2.A." to "Voluntary Limitation". Construction Permit History's Construction Permit No. 022015-004 now provides further explanation.

Comment #: 2

Attachment A does not include references to the emission factors used to verify compliance with the emission limitation, therefore, Attachment A may not be enforceable as a practical matter. Permit to Construct #022015-004 includes a detailed explanation of the derivation of the emission factors in the Emissions/Controls Evaluation portion of Permit to Construct #022015-004, which insures their practical enforceability. However, the draft operating permit is silent on emission factor derivation, therefore, EPA recommends MoDNR consider including the emission factor determination methods, as found under the Emission/Controls Evaluation in Permit to Construct #022015-004, as an integral part of Attachment A.

Response to Comment:

Attachment A now includes Construction Permit No. 022015-004's Emissions/Controls Evaluations which details emission factor sources/derivations.

Comment #: 3

Operational Limitation 1) in *Permit Condition 022015-004* limits the permittee from handling material, in excess of the amounts listed in Permit Condition #022015-004, for each corresponding emission unit per consecutive 12-month period. MoDNR indicates the authority for this operational limit derives from Special Condition 3.A., of Permit to Construct #022015-004, issued February 4, 2015. However, the list of emission units and the material handling limitations in this draft operating permit do not match the list of emission units and material handling limitations in Special Condition 3.A. Additionally, *Monitoring / Record keeping requirement 1*), *Permit Condition 022015-004*, requires the permittee to use Attachment B, or equivalent forms approved by the Air Pollution Control Program, to demonstrate compliance with *Operational Limitation 1*). However, the emission units and permitted material handling limits in Attachment B, in this draft operating permit, do not match the emission units and material handling limitations on the compliance verification attachment used in Permit to Construct #022015-004. 10 CSR 10-6.065(6)(C)l.A.(I) says "the permit shall specify and reference the origin of and authority for each term or condition and shall *identify any difference* (emphasis added) in form as compared to the applicable requirement upon which the term or condition is based." MoDNR has provided no explanation as to the differences between the emission units and handling limitations in Permit Condition 022015-004, in this draft operating permit. Therefore, EPA believes that the Special Conditions incorporated from Permit to Construct #022015-004, in Permit Condition 022015-004 should be identical, unless MoDNR provides a qualifying explanation. EPA recommends MoDNR consider resolving these differences.

Response to Comment:

Permit Condition 022015-004 only lists emission units with emission unit specific limitations established under Construction Permit #022015-004. All remaining emission units established under the construction permit are only limited by the construction permit's VOC plantwide limitation (i.e. Special Condition 2). This limitation appears in the operating permit under Permit Condition VOC.

Comment #: 4

Monitoring / Recordkeeping 1), in Plant Wide Emission Limitation Permit Condition VVVV, requires the permittee to keep a copy of each notification and report that is submitted to comply “*with this subpart,*” (emphasis added) Operating permits do not normally include “subparts,” so EPA suggests MoDNR consider using the actual 40 CFR part and subpart reference in lieu of the wording “*with this subpart.*”

Response to Comment:

The emphasized words have now been changed to state the following: “with Subpart VVVV.”