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4166 Demastus Lane • Columbia TN 38401 • Phone 931-388-1255 • Fax 931-388-6234  
www.catamarancruiser.com

June 29, 2017

Mr. James Johnston  
Tennessee Department of Environment & Conservation  
Deputy Director of Air Pollution Control

Email: [James.Johnston@tn.gov](mailto:James.Johnston@tn.gov)

Dear Mr. Johnston,

We are pleased to learn that TDEC is discussing ways to soften the fee impact of "Once In, Always In" as illustrated in its Strawman OIAI scenario. However, we would be further encouraged if the exception for emission reduction due to production volume were reevaluated and eliminated.

Catamaran Cruisers serves a relatively small market even in the best of economies. Houseboat sales peaked in 2005 with just under 500 new units registered nationwide. In the strongest of markets, our corresponding emissions were barely over the major source thresholds.

During that same period, our company spent over \$700,000 developing a styrene-free process that would have all but eliminated our emissions. Due to OIAI, it didn't matter; the \$7500 minimum fee remained the same. Furthermore, customers loved the idea of a styrene free product until they learned it was more costly. We were forced to revert back to styrene based resins. The bottom line of that expensive lesson remains the same. Everybody's green until the green has to come out of their pocket.

Although Catamaran Cruisers's market share percentage has remained steady over the last 12 years, the overall market has steadily declined. We have had years since 2005 where the \$7500 minimum fee translated into a cost of just under \$1000 per boat built while our emissions have hovered around one ton.

The current economy brings us hope that the houseboat market is improving. We do remain skeptical that the market will return to the point of major source thresholds.

We need relief. We are a small company with very limited resources. \$7500 is a week's payroll for us. We hold the opinion that companies forced into a Title V permit by a MACT standard should be offered a scaled minimum fee and it should not exclude scenarios where market forces have driven emissions below threshold limits.

Sincerely,  
Dale Bryant  
General Manager