

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 0401-AR-11

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
8001 National Drive
Post Office Box 8913
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Epoxy Products
500 East 16th Street
Mountain Home, Arkansas 72653

3. PERMIT WRITER:

Siew Low

4. PROCESS DESCRIPTION AND SIC CODE:

SIC Description: laboratory countertop manufacturer
SIC Code: 3821

5. SUBMITTALS: July 20, 2001

6. REVIEWER'S NOTES:

Epoxy Products operates a facility which manufactures laboratory counter tops (SIC Code 3821) in Mountain Home, Arkansas. This modification to permit #401-AR-10 is being issued to authorize the replacement of the existing electric kiln (uncontrolled), SN-22, with a new gas fired heat-cleaning oven. The new oven utilizes an afterburner as control equipment. The installation of the new equipment results in a PM/PM₁₀ reduction from 0.5 tons per year to 0.1 tons per year at SN-22. This permit modification authorizes an increase in plantwide SO₂ emission from 2.4 ton/yr to 2.5 ton/yr, VOC emission from 64.9 ton/yr to 65.0 ton/yr, CO from 4.2 ton/yr to 4.3 ton/yr, and NO_x from 15.8 ton/yr to 15.9 ton/yr.

7. **COMPLIANCE STATUS:** This facility is currently in compliance with all applicable regulations.

8. **APPLICABLE REGULATIONS:**

NSPS (Y/N) N If yes, subpart _____
 NESHAP (Y/N) N If yes, subpart _____
 PSD applicability (Y/N) N
 Is facility on 28 list (100 tpy)? (Y/N) N
 Was netting performed to avoid PSD review (Y/N) N

Indicate increases and decreases used in netting for PSD purposes only.

Emission Source	Pollutant Emission Rate (TPY)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	Pb
Totals							
Significant Emission Rate	25	15	40	40	100	40	0.6
Subject to PSD?							

Subject to 112 (g) requirements (Y/N) N
 Subject to CAM requirements (Y/N) N
 Other applicable regulations

9. **EMISSION CHANGES:**

The following table summarizes plantwide emission changes associated with this permitting

action.

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 0401-AR-10	Air Permit 0401-AR-11	Change
PM/PM ₁₀	29.6	29.2	-0.4
SO ₂	2.4	2.5	0.1
VOC	64.9	65.0	0.1
CO	4.2	4.3	0.1
NO _x	15.8	15.9	0.1
Phthalic Anhydride	7.9	7.9	0
Silica	0.0	0.0	0
Toluene	3.5	3.5	0
Xylene	3.9	3.9	0
Total HAPS	15.3	15.3	0

10. MODELING:

Criteria Pollutants

N/A

11. Non-Criteria Pollutants

From Previous Permit.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
22	Test Data from the manufacturer	0.014 lb/hr of PM ₁₀ 0.014 lb/hr of PM 0.007 lb/hr of SO _x 0.068 lb/hr of NO _x 0.007 lb/hr of CO 0.02 lb/hr of VOC	Direct-flame afterburner	N/A	lb/hr based on controlled scenario.
26	Mass Balance	0.03 lb/hr of PM 0.03 lb/hr of PM ₁₀	Filtrex Dust Collector (50 Hp)	99.9%	Uncontrolled
27	Mass Balance	0.12 lb/hr of PM 0.12 lb/hr of PM ₁₀	Filtrex Dust Collector (30 Hp)	99.9%	Uncontrolled

13. TESTING REQUIREMENTS:

N/A

14. MONITORING OR CEMS

N/A

15. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
SN-01 through SN-05, SN-07, SN-08, SN-10 through SN-17, and 20 through 23	5%	From Last Permit (Permit #401-AR-10)	Control Equipment Operation.
SN-18 & SN-19	0%	From Last Permit (Permit #401-AR-10)	Control Equipment Operation.
SN-26 & SN-27	5%	Regulation 18 (18.501)	Control Equipment Operation.

16. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

List all active permits for this facility which are voided/superseded/subsumed by issuance of this permit.

Permit #
401-AR-10

17. DELETED CONDITIONS:

N/A

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Permit #: 0401-AR-11

CSN #: 03-0027

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Lyndon Poole, P.E