

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0536-AR-5 AFIN: 23-00004

1. PERMITTING AUTHORITY:

Division of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

DBG Conway  
600 Dave Ward Drive  
Conway, Arkansas 72034

3. PERMIT WRITER:

Derrick Brown

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Sheet Metal Work Manufacturing  
NAICS Code: 332322

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
6/13/2020	Modification	There were no requested changes that would be considered new or modified emissions

6. REVIEWER'S NOTES:

DB Conway (23-00004) fabricates and paints metal for school busses and school bus chassis at 751 South Harkrider in Conway, Arkansas. This modification adds language ("as applied" to Specific Conditions #6 and #7) the facility feels will possibly clarify ambiguity and potential conflicts between the facility and Division. There were no emissions changes requested with this modification.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The most recent for this facility dated 03/19/15 stated areas of concern/non-compliance as follows:

- 1) Facility exceeded the VOC content limit.
- 2) Spark plug maintenance records for emergency generator were unavailable.
- 3) Insufficient information to determine the amount of hours ran on the emergency generator from installation to inspection date.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N  
If yes, were GHG emission increases significant? N/A

b) Is the facility categorized as a major source for PSD? N

- *Single pollutant  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-11	HAPs	40 C.F.R. § 63, Subpart ZZZZ

10. UNCONSTRUCTED SOURCES: N/A

11. PERMIT SHIELD – TITLE V PERMITS ONLY: N/A (Minor Source Permit)

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

N/A (Minor Source Permit)

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

The non-criteria pollutants listed below were evaluated. Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value ( $\text{mg}/\text{m}^3$ ), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV ( $\text{mg}/\text{m}^3$ )	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Acetone	1,187	130.58	210.0	N
t-butyl Acetate	950	104.5	210.0	N

2<sup>nd</sup> Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Division of Environmental Quality to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ( $\mu\text{g}/\text{m}^3$ ) = 1/100 of Threshold Limit Value	Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	Pass?
Acetone	11,871.1	1,225.36	Y
t-butyl Acetate	9,500.0	1,225.36	Y

c) H<sub>2</sub>S Modeling: N/A

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
01	MSDS	4.0 lbs VOC/gal 3.0 lbs HAP/gal 4.0 lbs Acetone/gal 4.0 lbs t-butyl Acetone/gal			8 guns; 6.563 gal/hr each
11	AP-42 Table 3.2-3	2.27 lbs NO <sub>x</sub> /MMBtu; 3.72 lbs CO/MMBtu; 2.96E-2 lbs VOC/MMBtu; 1.94E-2 lbs PM/PM <sub>10</sub> /MMBtu; 5.88E-4 lbs SO <sub>2</sub> /MMBtu			HAPs below reportable threshold.

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
No testing requirements this permit action.				

17. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
11	Hours of operation	Non-resettable hour meter	Continuous	N

18. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01	VOCs, HAPs	95.0 tons VOC/yr 9.5/24.0 tons HAPs/yr	Monthly	N
11	Hours of operation	None	Continuous	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
11	5%	§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311	Inspector observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
	No specific conditions were deleted this permit modification.

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Cat	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Natural Gas Combustion Sources (9.25 MM Bth/hr)	A-1	0.16	0.01	0.11	1.71	2.04		
		0.07	0.01	0.05	0.72	0.86		
		0.08	0.01	0.06	0.90	1.07		
		0.31	0.03	0.22	3.33	3.97		
Aboveground Diesel Storage Tank (Capacity – 6,000 gallons)	A-3			1.77				
Welding Operations	A-7	0.65						0.0204
Plasma Cutting Operations	A-7	1.249				0.688		0.011
CNC Laser Cutting	A-7	3.28				1.8		0.031
Burn-off Oven	A-13	0.212	0.0016	0.0154	0.2352	0.28		

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22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

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## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

