

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1272-AR-6

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Remington Arms Company, Inc.
2592 Arkansas Highway 15 North
Lonoke, Arkansas 72086

3. PERMIT WRITER:

Lloyd Davis

4. PROCESS DESCRIPTION AND SIC CODE:

SIC Description: Ammunition Manufacturing Plant
SIC Code: 3482

5. SUBMITTALS:

September 21, 2001

6. REVIEWER'S NOTES:

Inspection turned up a label printer that had not been included in the listed sources. Remington has also added eight other insignificant sources to the permit. MEK usage will increase by 0.57 tpy. This will be handled as an AA.

7. COMPLIANCE STATUS: The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues:

The facility is now in compliance with the receipt of the permit modification application.

8. APPLICABLE REGULATIONS:

NSPS (Y/N) N If yes, subpart _____
 NESHAP (Y/N) Y If yes, subpart T
 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
 Subject to 112 (g) requirements (Y/N) N
 Subject to CAM requirements (Y/N) N
 Other applicable regulations: Reg 18, Reg 19

9. EMISSION CHANGES:

The following table summarizes plantwide emission changes associated with this permitting action.

| Plantwide Permitted Emissions (ton/yr) | | | |
|---|---------------------------------|---------------------------------|---------------|
| Pollutant | Air Permit 1272-AR-6 | Air Permit 1272-AR-7 | Change |
| PM | 3.9 | 3.9 | 0 |
| PM ₁₀ | 3.9 | 3.9 | 0 |
| SO ₂ | 0.1 | 0.1 | 0 |
| VOC | 71.9 | 72.5 | 0.6 |
| CO | 8.2 | 8.2 | 0 |
| NO _x | 88.5 | 88.5 | 0 |
| Lead | 1.4867 | 1.4867 | 0 |
| Antimony | 0.17485 | 0.17485 | 0 |
| Arsenic | 0.00844 | 0.00844 | 0 |
| Perchloroethylene | 9.9 | 9.9 | 0 |
| Methyl Ethyl Ketone | 0.4 | 0.97 | 0.57 |

10. MODELING: Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

11. MODELING: Non-Criteria Pollutants

No significant amounts of HAPs or air contaminants are being added.

12. CALCULATIONS:

| SN | Emission 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) |
|----|---------------------------------------|--|---------------------------------|------------------------------|---|
| 30 | AP-42 | various | dust collector | 90% | Included combustion of natural gas. |
| 47 | Equip. Max. | 0.4 lb/hr | | | All used is assumed emitted. |

13. TESTING REQUIREMENTS:

This permit does not require stack testing of any source.

14. MONITORING OR CEMS

There are no parameters that must be monitored with CEMs or other monitoring equipment (temperature, pressure differential, etc).

15. RECORD KEEPING REQUIREMENTS

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

| SN | Recorded Item | Limit (as established in permit) | Frequency * | Report (Y/N)** |
|-----------|--|---|--------------------|-----------------------|
| Facility | VOC emissions | 71.4 tons per 12 consecutive months | Monthly | N |
| Facility | Perchloroethylene emissions | 1,450 gallons per 12 consecutive months | Monthly | N |
| 30 | Primed centerfire and rimfire shells, or loaded rimfire cartridges processed | 3,000 tons per 12 consecutive months | Monthly | N |
| 31 | Shotshells processed | 2,200 tons per 12 consecutive months | Monthly | N |
| 31 | Loaded pistol, rifle, and rimfire rounds processed | 3,000 tons per 12 consecutive months | Monthly | N |

* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

** Indicates whether the item needs to be included in reports

16. OPACITY

There have been no changes in opacity requirements.

17. DELETED CONDITIONS:

The following Specific Conditions were included in the previous permit, but deleted for the current permitting action.

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| Former SC | Justification for removal |
|----------------------|---|
| 11 | MEK has been removed from the list of specific HAPs allowed, as it is used at less than 1 tpy in twolabel printers now classified as insignificant sources. |

18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

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

| Permit # |
|-----------------|
| 1272-AR-6 |

19. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Thomas Rheaume, P.E.