

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1624-AOP-R0

1. PERMITTING AUTHORITY:

Arkansas Department of Pollution Control and Ecology
8001 National Drive
Post Office Box 8913
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Bass Cat Boats
Hwy 126 Industrial Park
Mountain Home, Arkansas 72653

3. PERMIT WRITER:

Wesley Crouch

4. PROCESS DESCRIPTION AND SIC CODE:

SIC Description: Fiberglass Boat Manufacturer
SIC Code: 3732

5. SUBMITTALS: 8-7-97, 2-29-98, 6-25-98, 8-11-98

6. REVIEWER'S NOTES:

This is the initial Operating Permit for this facility. Bass Cat is subject to Title V because VOC and HAP emissions are above the thresholds. Increases in the permitted amounts of VOC and Styrene result from larger boats being produced at this facility. No changes in the manner that they are produced has occurred.

7. APPLICABLE REGULATIONS:

NSPS (Y/N) NO If yes, subpart _____
 NESHAP (Y/N) NO If yes, subpart _____
 PSD applicability (Y/N) NO
 Is facility on 28 list (100 tpy)? (Y/N) NO
 Was netting performed to avoid PSD review (Y/N) NO

Subject to 112 (g) requirements (Y/N) NO
 Subject to CAM requirements (Y/N) NO
 Other applicable regulations

8. EMISSION CHANGES:

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

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 1624-A	Air Permit 1624-AOP-R0	Change
PM/PM ₁₀	0.9	0.3	-0.6
SO ₂	0.0	0.0	0
VOC	84.7	168.6	83.9
CO	0.0	0.0	0
NO _x	0.0	0.0	0
Acetone	6.8	34.6	27.8
Tetrafluoroethane	1.9	0.0	-1.9
Toluene	0.0	2.0	2.0
Styrene	0.0	84.8	84.8

9. MODELING:

A. Criteria Pollutants

Criteria pollutants did not exceed the level of significance and posed no threat to the NAAQS. Modeling was not performed

B. Non-Criteria Pollutants

1st Tier Screening (PAER)

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

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11*TLV	Proposed lb/hr	Pass?
Styrene	85	9.35	78.7	NO
Toluene	188	20.68	3.66	YES

2nd Tier Screening (PAIL)

ISCST3 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 was deemed by the Department to be one one-hundredth of the Threshold Limit Value, as listed by the ACGIH.

Pollutant	(PAIL, mg/m^3) = 1/100 of Threshold Limit Value	Modeled Concentration (mg/m^3)	Pass?
Styrene	0.85	0.846	YES

Odor Modeling for Styrene was performed. The threshold value for Styrene is $1361 \mu\text{g}/\text{m}^3$ and the modeled 1-hour average at the boundary was determined to be $470.9 \mu\text{g}/\text{m}^3$.

10. 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)
01, 02, 03, 06, 07	AP-42 Chpt. 4.4	See comment	None	N/A	This is the AP-42 for Polyester Resin products. The emission factors vary according to the specific process. Emission rates are based on maximum equipment capacity.
04	AP-42, Chpt. 13.2.6	13 lb PM ₁₀ /lb abrasive	Enclosure (3-sides)	N/A	

11. TESTING REQUIREMENTS:

This permit requires stack testing of the following sources.

There are no testing requirements in this permit.

12. MONITORING OR CEMS

There are no CEMS required in this permit.

13. 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)**
		Compound	Limit		
01, 02, 03, 06, 07	Annual amounts used	Acetone	10,500 gal	Monthly	Yes
		Resin	1,272,000 lb		
		Gelcoat	276,000 lb		
		Solvents	96,000 lb		
		Paints/Primers	4000 gal		
		Foam	120,000 lb		
		04	annual sand used		
PW	VOC content of paints/primers	7.1 lb/gal		When a new compound is used	No
PW	# of boats produced	4 boats per day		daily	No
PW	Styrene content of gelcoat and foam	60% by weight		When a new compound is used	No

* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)
 ** Indicates whether the item needs to be included in reports

14. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
04	5	Department Guidance	Weekly Observations

15. DELETED CONDITIONS:

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

Former SC	Justification for removal
5	Records of waste recovery are not necessary because the facility is not claiming a credit for waste sent off site.

16. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Tom Rheume, P.E.