

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1865-AOP-R7 AFIN: 07-00033

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Armtec Countermeasures - Easterline Armtec Countermeasures  
Highland Industrial Park, Building M-7  
East Camden, Arkansas 71701

3. PERMIT WRITER:

Kimberly O'Guinn

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: All Other Miscellaneous Chemical Product and Preparation  
Manufacturing

NAICS Code: 325998

5. SUBMITTALS:

4/21/2014

6. REVIEWER'S NOTES:

Armtec Countermeasures Company (Armtec) is located at Building M-25 in the Highland Industrial Park, East Camden, Calhoun County, Arkansas. Armtec manufactures and tests explosive ordnance and disposes of explosive/pyrotechnic waste in open thermal treatment units. This permit modification is to update and clarify the conditions associated with the Natural Gas Fired Boilers (SN-04). The previous permit notes the inclusion of 17 boilers permitted as SN-04. This modification is to include the existing process boilers and water heaters listed in the permit as insignificant activities and also to allow for possible future changes involving small boilers that may occur. Total permitted emission rates will increase as follows: 0.6 tons/year (tpy) PM<sub>10</sub>/PM, 7.3 tpy CO, 8.7 tpy NO<sub>x</sub>, and 0.4 tpy of Total HAPs.

7. COMPLIANCE STATUS:

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

There are no active or pending enforcement actions for this facility at this time.

8. PSD APPLICABILITY:

a. Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

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?*

9. GHG STATUS:

Indicate one:

- Facility is classified as a major source for GHG and the permit includes this designation
- Facility does not have the physical potential to be a major GHG source
- Facility has restrictions on GHG or throughput rates that limit facility to a minor GHG source. Describe these restrictions: \_\_\_\_\_

10. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
N/A		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

a) NAAQS:

Pursuant to Act 1302 of the Regular Session of the 89th General Assembly of the State of Arkansas, no dispersion modeling was performed by ADEQ because it was not voluntarily proposed and agreed to by the facility. No other information was submitted by the applicant. Criteria pollutants were not evaluated for impacts on the NAAQS.

b) Non-Criteria Pollutants:

The facility emits HAPs related to natural gas combustion from the group of natural gas boiler permitted as SN-04. Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	Mass Balance	450,000 lbVOC/year			Annual limits based on production rates. Hourly limits based on 4,000 hour /year operation
02	AP-42 Table 15.8.16-1 (7/2009)	<u>lb/lb explosive wt</u> NOx: 4.34E-04 CO: 4.20E-03 VOC: 1.30E-03 PM: 2.80E-02 PM <sub>10</sub> : 2.00E-02 SO <sub>2</sub> : 2.60E-02			Synthetic limitation of 40,000 lb/yr explosive material testing. Total maximum hourly testing rate is 90 lb/hr
03	AP-42 Table 15.8.16-2 (7/2009)				
04	AP-42 Tables 1.4-1 and 1.4-2	<u>lb/MMscf</u> NOx:100 CO: 84 VOC: 11 PM/PM <sub>10</sub> : 7.6 SO <sub>2</sub> :0.6			Group of boilers with a total natural gas heat input of 40 MMBtu/hr

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
There are no testing requirements for this permit.				

15. 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)
There are no monitoring requirements for this permit.				

16. 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	n-Hexane volume	3%	As Received	Y
01	Hexane Purchased	9.50 tpy	Monthly	Y
01	Acetone Purchased	346.50 tpy	Monthly	Y
01-R1	VOC Acetone n-Hexane	3.7 tpy 0.20 tpy 0.11 tpy	Monthly	Y
02	Amount of Ordinance tested	40,000 lb/year	Monthly	Y
03	Amount of Waste Burned	500 lb/day	Daily	Y
03	Amount of Waste Burned	130,000 lb/year	Monthly	Y
04	Natural Gas Throughput	40.0 MMBtu/hr	Upon change of equipment	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02	No Limit	Waiver from Opacity limits of Reg 19 granted by July 17, 2002 letter from ADEQ Director	N/A
03	No Limit		N/A
04	5%	Department Guidance	Daily Observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

19. GROUP A INSIGNIFICANT ACTIVITIES

Source Name	Group A Category	Emissions (tpy)							
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs		
							Single	Total	
Misc. Coatings, Adhesives, and Inks Usage	13			0.5					0.07
Acetone for Cleaning Purposes	13								

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1865-AOP-R6



## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 11-06-13

Facility Name: armtec Countermeasures - Easterline  
 Armtec Countermeasures  
 Permit Number: 1856-AOP-R7  
 AFIN: 07-00033

\$/ton factor	23.42	Annual Chargeable Emissions (tpy)	594.2
Permit Type	Minor Mod	Permit Fee \$	500

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	9.3
Initial Title V Permit Fee Chargeable Emissions (tpy)	

*HAPs not included in VOC or PM:*

*Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

*Air Contaminants:*

*All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		3.2	3.8	0.6	0.6	3.8
PM <sub>10</sub>		2.4	3	0.6		
SO <sub>2</sub>		0.3	0.3	0	0	0.3
VOC		226.2	226.2	0	0	226.2
CO		7.6	14.9	7.3		
NO <sub>x</sub>		8.7	17.4	8.7	8.7	17.4
n-Hexane	<input type="checkbox"/>	9.5	9.5	0		
Acetone	<input checked="" type="checkbox"/>	346.5	346.5	0	0	346.5



