

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 2016-A

IS ISSUED TO:

Hall Tank Company
2001 East 5th Street
North Little Rock, AR 72119
Pulaski County
AFIN: 60-00058

THIS PERMIT IS Hall Tank Company's AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Porta
Interim Chief, Air Division

Date

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Section I: FACILITY INFORMATION

PERMITTEE: Hall Tank Company

AFIN: 60-00058

PERMIT NUMBER: 2016-A

FACILITY ADDRESS: 2001 East 5th Street
North Little Rock, AR 72119

COUNTY: Pulaski County

CONTACT PERSON: Gerald Carman

CONTACT POSITION: President

TELEPHONE NUMBER: 501-945-3211

REVIEWING ENGINEER: Karen Cerney

UTM Zone: 15

UTM North-South (Y): 3846.2

UTM East-West (X): 569.1

Section II: INTRODUCTION

Summary

The Hall Tank Company is located in North Little Rock at 2001 East 5th Street. The facility manufactures both above and underground steel storage tanks and coats them according to consumer specifications. This modification allows the facility to add the existing sandblasting operation as a permitted source and to become a synthetic minor source.

Process Description

The facility has three booths in which coatings to the tanks can be applied. Two booths are dedicated to FRP coatings (fiber-reinforced polymer). Paint and primer are applied in the third booth. Tanks are assembled and welded by hand from mostly pre-cut steel components. Tanks are first moved into the appropriate coating bay and then the coating type and process are determined. First the primer coat or first coat is applied, followed by any intermediate layers according to coating manufacturer’s recommendations. Each tank is then allowed to cure fully before being handled. The finished tanks are removed from the coating bay and either loaded for shipment or placed into inventory.

Regulations

This facility is subject to regulation under the Arkansas Air Pollution Control Code (Regulation 18) and the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19).

The following table is a summary of the facility's total emissions.

Table 1 - Total Allowable Emissions

Total Allowable Emissions		
Pollutant	Emissions Rates	
	lb/hr	tpy
PM	19.4	17.9
PM ₁₀	11.0	9.2
VOC	122.7	90.0*
Any Single HAP	N/A	9.50*
Combination of All HAPs	91.50	24.50*
Acetone**	130.00	4.95
*Facility Wide Limits **Acetone is considered an air contaminant and is not included in other totals.		

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Section III: PERMIT HISTORY

2016-AOP-R0 This was the initial permit assigned to the facility.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee will not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #s 8, 13, 15, and 16. [§19.501 *et seq.* of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective December 19, 2004, (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 2 - Criteria Pollutants

SN	Description	Pollutant	lb/hr	tpy
SN-01	Paint Booth	PM ₁₀	0.8	0.8
		VOC	25.7	90.0*
SN-02	FRP Booths 1 & 2	PM ₁₀	2.4	0.3
		VOC	97.0	90.0*
SN-03	Sand Blasting Operations	PM ₁₀	7.8	8.1

*Facility wide limits

2. The permittee will not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #s 6, 10, 11, 13, 15, and 16. [§18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 3 - Non-Criteria Pollutants

SN	Description	Pollutant	lb/hr	tpy
SN-01	Paint Booth	PM	0.8	0.8
		Any Single HAP	N/A	9.50*
		Combination of All HAPs	25.70	24.50*
SN-02	FRP Booths 1 & 2	PM	2.4	0.3
		Any Single HAP	N/A	9.50*
		Combination of All HAPs	65.80	24.50*
SN-03	Sand Blasting Operations	PM	16.2	16.8
Facility Wide	Acetone Usage	Acetone	130.00	4.95

*Facility wide limits

- Visible emissions will not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. The permittee will keep all doors closed during spraying to demonstrate compliance with this limit at SN-01 and SN-02. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 4 - Visible Emissions

SN	Limit	Regulatory Citation
SN-01	0%	§18.501
SN-02	0%	§15.501
SN-03	20%	§19.503

- The permittee will not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [§18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]
- The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-01 Conditions

- The permittee will not use any hazardous air pollutant (HAP) containing materials which do not meet the requirements of the following table, with the exception of styrene. No styrene is to be emitted at this source. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 5 – TLV Table

Paint Booth, SN-01, Parameters	
Maximum lb/gal of a single HAP	Minimum TLV (mg/m ³)
5.14	130.03
4.63	117.02
4.12	104.02
3.60	91.02
3.08	78.02

Paint Booth, SN-01, Parameters	
Maximum lb/gal of a single HAP	Minimum TLV (mg/m ³)
2.57	65.01
2.06	52.01
1.54	39.01
1.03	26.01
0.52	13.00
0.26	6.50
0.21	5.20
0.15	3.90
0.11	2.60
0.05	1.30
0.03	0.65

7. The permittee will maintain records of TLV and the lb/gal of each HAP in paints used to demonstrate compliance with Specific Condition # 6. These records will be updated as needed, kept on site, and will be made available to Department personnel upon request. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee will not exceed a VOC content of 5.14 lb/gallon for paints used at this source, except as specified. The permittee may use coatings with a VOC content greater than 5.14 lb/gal provided that they do not exceed 205.6 lb of VOC/day emitted from SN-01. The daily emission limit only applies on days when the permittee uses a coating with a VOC content greater than 5.14 lb/gal. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
9. The permittee will maintain records of the VOC content of all paints and coatings used to demonstrate compliance with Specific Condition #8. The records will be updated as needed, kept on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-02 Conditions

10. The permittee may not exceed the styrene content indicated for each method of resin application. Substitution of resin additives may only be made if replacement components are of equivalent or lesser weight per gallon and have an equivalent or higher threshold limit value (TLV). [§19.705 of Regulation 19, §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 6 – Styrene Content

Application Method	% Styrene
Manual	78.16%
Mechanical Atomized	49.11%
Mechanical Atomized Controlled Spray*	56.25%
Mechanical Non-Atomized	100.00%

*Mechanical Atomized Controlled Spray is the default application method and is the application method used unless usage records indicate otherwise.

11. The permittee may not exceed the following limit. Substitutions may be made only if replacement components are of equivalent or lesser weight per gallon and have an equivalent or higher TLV. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 7 – Resin Limits

Component	Emissions (lb/gal)
Non-styrene resin additives	1.65 lb HAP/gal resin (HAP TLV>85 mg/m ³)

12. The permittee will maintain records of TLV, percent styrene content, and the lb/gal of each HAP in resins used to demonstrate compliance with Specific Condition #s 10 and 11. Additionally, the permittee will maintain records of the application method if a method other than mechanical atomized controlled spray is used. These records will be updated as needed, kept on site, and will be made available to Department personnel upon request. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-03 Conditions

- 13. The permittee will not use more than 2,080 tons of sand per consecutive twelve month period. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 14. The permittee will maintain records of sand usage to demonstrate compliance with Specific Condition #13. The permittee will maintain a twelve month rolling total and each individual month’s data on site and make these records available to Department personnel upon request. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Facility Wide Conditions

- 15. The permittee will keep all booth doors closed during spraying. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 16. The permittee will not exceed the emission rates set forth in the following table. [§19.501 of Regulation 19, §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 8 – Facility Wide Limits

SN	Pollutant	tpy
Facility Wide	VOC	90.0
	Any Single HAP	9.50
	Combination of All HAPs	24.50

- 17. The permittee will maintain monthly records of HAP and VOC emissions from all sources which demonstrate compliance with Specific Condition #16. The permittee will also maintain daily records of VOC emissions at SN-01 on days that a paint with a VOC content greater than 5.14 lb/gal is used at SN-01 to demonstrate compliance with Specific Condition #8. The permittee will maintain a twelve month rolling total and each individual month’s data on site and make these records available to Department personnel upon request. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. [§19.705 of Regulation 19, §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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18. The permittee will demonstrate that the degree of accuracy of the calculations used to determine emissions is sufficient to prove that the major source thresholds have not been exceeded if the actual emissions are calculated at or above 95% of the major source thresholds (i.e. 95 tpy criteria pollutants, 9.5/23.75 tpy of individual/combined HAPs). [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
19. The permittee will not use more than 500 gallons of acetone per month or 1,500 gallons of acetone per consecutive twelve month period. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
20. The permittee will maintain records of acetone purchases to demonstrate compliance with Specific Condition #19. The permittee will maintain a twelve month rolling total and each individual month's data on site and make these records available to Department personnel upon request. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated **7/15/2005**. Operations at Hall Tank may include some emission units, operations, or activities that are considered Group B Insignificant Activities. Group B Insignificant Activities are not required to be specifically included in a permit application or permit.

Table 9 - Insignificant Activities

Description	Category
Welding	A-7

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [§19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [§19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit; such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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Arkansas Department of Environmental
Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee will provide: [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms;
 - d. Utilities for sampling and testing equipment.
9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [§19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [§19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.

- b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.
11. The permittee will allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [§19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30)

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days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [§19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]