

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2016-AOP-R1 AFIN: 60-00058

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Hall Tank Company, LLC
2001 East 5th Street
North Little Rock, Arkansas 72119

3. PERMIT WRITER:

Adam McDaniel

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Metal Tank (Heavy Gauge) Manufacturing
NAICS Code: 332420

5. SUBMITTALS:

5/15/2012, 11/2/2012, 12/6/2012, 12/18/2012, and 1/10/2013

6. REVIEWER'S NOTES:

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 to the permit includes permitting two paint booths and one FRB booth. Also, the TLV table and conditions will be replaced with Material Safety Data Sheets and throughput limits. The total annual permitted emission rate limit changes associated with this modification includes: +0.5 tpy PM/PM₁₀ and -5.8 tpy VOC. Since the TLV table was removed, the total annual permitted emission rate limits for the HAPs and air contaminants include: 13.45 tpy Xylene, 56.4 tpy Styrene, 0.66 tpy Cobalt Compound, and 10.2 tpy Acetone.

7. COMPLIANCE STATUS:

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

The facility is currently under enforcement for an inspection on May 7, 2012.

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 ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list, or
 - CO_{2e} potential to emit $\geq 100,000$ tpy and ≥ 100 tpy/ ≥ 250 tpy of combined GHGs?

If yes, explain why this permit modification is not PSD.

9. GHG MAJOR SOURCE (TITLE V):

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)
01 & 02	HAP's	NESHAP 40 CFR Part 63 Subpart WWW
01 & 02	HAP's	NESHAP 40 CFR Part 63 Subpart MMMM

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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.

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 Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), 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	85.20	9.372	32.3	N
Xylene	434.19	47.6709	2.96	Y
Cobalt Compound	0.05	0.0022	0.34	N

2nd 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 Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH. Styrene was not re-modeled due to a decrease in hourly emissions.

Pollutant	PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Styrene	852.0	40.05	Y
Cobalt Compound	0.5	0.4216	Y

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	MSDS	Paint= 1.0 Gallons Paint Used per 1,000 Gallons of Tank Painted Primer= 0.25 Gallons Primer Used per 1,000 Gallons of Tank Painted	Three (3)- 3C412B (30") 3 HP Dayton Tubeaxial Fans		2 Run Simultaneously
02	MSDS	Resin= 7.5 Gallons Resin Used per 1,000 Gallons of Tank Painted Catalyst = 1/50 th of Resin =0.15 Gallons of Catalyst Used per 1,000 Gallons of Tank Painted	Four (4)- 3C411B (24") 1HP Dayton Tubeaxial Fans		1, 2, or 3 Run Simultaneously
03	Dept. Guidance	PM: 27 lb/ 1000 lb of sand used PM ₁₀ : 13 lb/1000 lb of sand used	None		
04	MSDS				

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

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)
None				

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, 02, 04	MSDS	-	Annual	Y
01, 02	Paint (Urethane) & Primer (Carbo Coat Primer)	6,423,000 Gallons of Tank Painted	Annual	Y
	Polyester Resin Solution (F774-PTM-30) & Catalyst (Luperox DDM-9) (Luperox DHD-9)	3,489,000 Gallons of Tank Painted		
03	Sand	2,080 tons	Annual	N
04	Acetone Xylene	3,120 Gallons 3,120 Gallons	Annual	Y
Facility	Certificate of Styrene Content	47%	Annual	Y

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, & 04	0%	Dept. Guidance	Inspector's Observation
03	20%	Dept. Guidance	Inspector's Observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
None	

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19. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Welding	A-7						0.00001	
Filling Touch-Up Paint Cans	A-13			0.01			0.0003	0.00035

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

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21. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

Phillip Murphy, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 08-20-12

Facility Name: Hall Tank Company, LLC
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\$/ton factor	22.97	Annual Chargeable Emissions (tpy)	112.8
Permit Type	Initial Permit	Permit Fee \$	2591.016

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)	4.9
Initial Title V Permit Fee Chargeable Emissions (tpy)	112.8

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	<input checked="" type="checkbox"/>	17.9	18.4	0.5	0.5	18.4
PM ₁₀	<input type="checkbox"/>	9.2	9.7	0.5		
SO ₂	<input type="checkbox"/>	0	0	0		
VOC	<input checked="" type="checkbox"/>	90	84.2	-5.8	-5.8	84.2
CO	<input type="checkbox"/>	0	0	0		
NO _x	<input type="checkbox"/>	0	0	0		
Single HAP	<input type="checkbox"/>	9.5	0	-9.5		
Combined HAP	<input type="checkbox"/>	24.5	0	-24.5		
Xylene	<input type="checkbox"/>	0	13.45	13.45		
Styrene	<input type="checkbox"/>	0	56.4	56.4		
Cobalt Compound	<input type="checkbox"/>	0	0.66	0.66		
Acetone	<input checked="" type="checkbox"/>	0	10.2	10.2	10.2	10.2