

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2016-AR-1 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 72114

3. PERMIT WRITER:

Charles Hurt, P.E.

4. NAICS DESCRIPTION AND CODE:

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

5. SUBMITTALS:

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
5/13/2015	Modification	None

6. REVIEWER'S NOTES:

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. Hall Tank Company submitted an application to transition from a Title V permit to a Minor Source permit, reduce the allowable volume of tank that may be coated at SN-01, and reduce the throughput of sand at SN-03. The application included modifications to permit existing sources and operations (SN-05 and SN-07) that will become affected sources of NESHAP XXXXXX upon issuance of Permit No. 2016-AR-1. In addition to these modifications, the NESHAP WWWW and NESHAP MMMM requirements have been removed based on facility records showing major source

thresholds were never exceeded. Overall, permitted emissions changed by -8.1 tpy PM, +0.1 tpy PM<sub>10</sub>, -38.5 tpy VOC, and -0.3 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 was last inspection on August 21, 2013. The inspection reported the facility was out of compliance. The inspection report noted the following concerns:

Specific Condition #7 of permit 2016-A: A review of the records provided by the facility indicated that the spreadsheet contained incorrect threshold limit values for the following EPA listed HAPs: Styrene (100-42-5), Ethyl benzene (100-41-4), Toluene (108-88-3), Hexamethylene Diisocyanate (822-06-0), and Methyl Isobutyl Ketone (108-10-1).

Specific Condition #19 of permit 2016-A: A review of the records provided by the facility indicated that from March 2012 through December 2012 the facility exceeded their 12-month rolling total limit of 1500 gallons/consecutive twelve month period. The facility failed to provide monthly and 12-month total records of acetone usage for January 2013 through April 2013; under their permit 2016-A. Therefore, compliance during the months of January 2013 through April 2013 cannot be determined.

INSPECTION COMMENT: This inspection was a partial compliance inspection and therefore did not address the new applicable subparts (40 CFR 63 subparts MMMM and WWWW) listed in their Title V permit, issued on May 14, 2013. The compliance requirements for the subparts will be addressed during the next inspection.

A CAO is pending.

8. PSD APPLICABILITY:

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

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*

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

N/A

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	MFHAPs	NESHAP 6X

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H2S Modeling:

No hydrogen sulfide emissions have been reported.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	MSDS	<p><b>Paint</b>= 1.0 Gallons Paint Used per 1,000 Gallons of Tank Painted  VOC content: 55%  PM= (0.81 gal of coating/hr)(10 lb of solid/gal of coating)(0.80 overspray)= 6.48 lb/ of solid/hr uncontrolled*(100-90/100)= 0.65 lb/hr</p> <p><b>Catalyst Reducer</b> Xylene= 15.15%</p> <p><b>Primer</b>= consists of primer &amp; catalyst  0.25 Gallons Primer Used per 1,000 Gallons of Tank Painted  Xylene= 8.3%  VOC= 2.93 lb/gal</p>	Six (6)- 3C412B (30") 3hp Dayton Tubeaxial Fans		<p>2 Run Simultaneously</p> <p>Paint= 4:1 ratio with catalyst reducer</p> <p>Throughput= 0.81 gallons of paint/hr</p>

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
02	MSDS	<b>Resin</b> = 7.5 Gallons Resin Used per 1,000 Gallons of Tank Painted <b>Catalyst</b> = 1/50 <sup>th</sup> 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 <sub>10</sub> : 13 lb/1000 lb of sand used	None		1,000 tons of sand per year
04	MSDS				3,744 gallons per year of acetone
05	AP-42	0.005 lb PM / lb wire	None		
07	Engineering Estimate	1.59 lb PM/hr	None		Based on operation of Plasma cutter, 2 band saws, and 1 drill press

## 13. TESTING REQUIREMENTS:

The permit does not require performance or stack tests.

## 14. MONITORING OR CEMS:

This permit does not require CEMS or other monitoring devices.

## 15. 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, 03, 04 05, 07	MSDS HAP content by species	--	Annual	N
01, 02	Volume of tank coated	3,489,000 gals of tank painted, each source*	Monthly	Y
03	Sand Throughput	1,000 tons	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
04	Acetone Usage	3,744 gallons	Monthly	N
	Solvent Usage	N/A*	Monthly	Y
05	MSDS HAP content for MFHAP for wire used	N/A	Refer to "Site-specific Welding Emissions Manage Plan" which is required by NESHAP 6X	Y

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
All sources	20%	Department Guidance	1. Inspector observations for sources not subject to 6X visible emission standards. 2. Sources subject 6X requirements – daily visible emissions observations

17. DELETED CONDITIONS:

Former SC	Justification for removal
8, 9	Replaced by another compliance mechanism.

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)		
		PM/PM <sub>10</sub>	HAPs	
			Single	Total
Sand Loadout	#13	0.1		
Perlite Filling	#13	0.2		
Grinding Operations	#13	0.5		0.07

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19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2016-AOP-R2

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source Changing to Minor Source

Revised 08-25-14

Facility Name: Hall Tank Company,  
 LLC  
 Permit Number: 2016-AR-1  
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\$/ton factor	23.89	Annual Chargeable Emissions (tpy)	35
Minimum Fee \$	400	Permit Fee \$	400

Title V Permit Chargeable Emissions (tpy) 106.2

*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 condensable PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Title V Permit Annual Chargeable Emissions
PM		20	11.9	-8.1	20
PM <sub>10</sub>		11.3	11.4	0.1	
SO <sub>2</sub>		0	0	0	0
VOC		73.5	35	-38.5	73.5
CO		0	0	0	
NO <sub>x</sub>		0	0	0	0
Acetone	<input checked="" type="checkbox"/>	12.7	12.4	-0.3	12.7