

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2016-AR-4 AFIN: 60-00058

1. PERMITTING AUTHORITY:

Division 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:

Jimmy Do

4. NAICS DESCRIPTION AND CODE:

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

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

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
9/23/2022	Deminimis	Increased the VOC and total HAPs

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 a de minimis application to use a paint catalyst and primer, increasing VOCs to 17.9 tpy and Total HAPS 24.3 tpy. Specific Conditions #6 and #8 increase the allowable VOCs to 37.2 tpy and the single HAP to 24.5 tpy.

7. COMPLIANCE STATUS:

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

There was a complaint about an odor coming from Hall Tank Company, LLC. placed on October 3, 2017. However, an investigation on October 12, 2017 found that they were in compliance and that no odor escaped from their property.

The last inspection was conducted on April 11, 2017 and found no violations. No areas of concern were noted. There was no violation in the last 12 quarters on EPA ECHO.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant?

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*

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

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

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
None				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit?

If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
--------	-------------------------	--------

Source	Inapplicable Regulation	Reason
N/A		

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
N/A		

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

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

c) H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards

Y

If exempt, explain: The facility does not have H₂S emissions.

15. 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>Paint= 1.0 Gallons Paint Used per 1,000 Gallons of Tank Painted VOC content: 62.84% 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>Catalyst Reducer Xylene= 0.62%</p> <p>Primer= consists of primer & catalyst 0.25 Gallons Primer Used per 1,000 Gallons of Tank Painted Xylene= 20-30% VOC= 4.8 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 = 1 gallon of paint/hr</p>
02	MSDS	<p>Resin= 7.5 Gallons Resin Used per 1,000 Gallons of Tank Painted Catalyst = 1/50th of Resin =0.15 Gallons of Catalyst Used per 1,000 Gallons of Tank Painted</p>	Four (4)-3C411B (24") 1hp Dayton Tubeaxial Fans		1, 2, or 3 Run Simultaneously
03	AP-42 13.2.6	<p>PM: 0.027 lb/lb of sand used PM₁₀: 0.017 lb/lb of sand used Cadmium: 1.8 E-06 lb/lb Chromium: 2.5 E-06 lb/lb Manganese: 1.5 E-06 lb/lb Nickel: 2.0 E-06 lb/lb Lead: 1.8 E-06 lb/lb</p>	Dust Collector	95%	1,000 tons of sand per year 1,200 lb/hr
	San Diego	PM/PM ₁₀ : 7.6 lb/ton steel	None	N/A	10 tpy of steel

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	Air Pollution Control District	abrasives Cadmium: 3.61E-03 lb/ton Chromium: 3.65E-02 lb/ton Nickel: 3.65E-02 lb/ton Lead: 3.27E-03 lb/ton			abrasives 60 lb/hr 1.2% Mn content
04	MSDS	Acetone: 6.59 lb/gal	None	N/A	8,000 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

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

17. 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)
N/A				

18. 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)
----	---------------	--------------	-----------	--------------

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 Usage	1,000 tons per consecutive 12 month period	Monthly	N
	Steel Abrasives Usage	10 tons per consecutive 12 month period	Monthly	N
04	Acetone Usage	8,000 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

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01 & 02	0%	§18.501	1. Inspector observations for sources not subject to visible emission standards. 2. There are no records keeping required.
03, 05, & 07	20%	§19.305 (B)(2) Department Guidance	1. Inspector observations for sources not subject to 6X visible emission standards. 2. Sources subject 6X requirements – daily visible emissions observations

20. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)			
		PM/PM ₁₀	VOC	HAPs	
				Single	Total
150 gal Diesel Storage Tank	A-3		2.1E-04		
Sand Loadout	A-13	0.1			
Perlite Filling	A-13	0.2			
Grinding Operations	A-13	0.5			
330 Gallon Acetone Storage Tank	A-13				0.07

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
2016-AR-3

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Hall Tank Company,
 LLC
 Permit Number: 2016-AR-4
 AFIN: 60-00058

			Old Permit	New Permit
\$/ton factor	25.13	Permit Predominant Air Contaminant	35	37.3
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	2.3	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	37.3	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	12	12	0
PM ₁₀	11.5	11.5	0
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	35	37.3	2.3
CO	0	0	0
NO _x	0	0	0
Total HAPs	16.27	24.3	8.03
Acetone	26.4	26.4	0