

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2388-A AFIN: 45-00251

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Advanced Marine Performance, LLC
727 West Industrial Park Road
Flippin, Arkansas 72634

3. PERMIT WRITER:

Derrick Brown

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Boat Building
NAICS Code: 336612

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
4/5/2019	New (modification) – Registration to Minor Source permit	Increase in production of recreation metal boats.

6. REVIEWER'S NOTES:

Advanced Marine Performance, LLC (Advanced), owns and operates a recreational metal boat manufacturing facility located at 727 West Industrial Park Road, Flippin, Arkansas. This modification increases production and permits facility emissions of 2.1 tpy of PM/PM₁₀, 0.1 tpy of SO₂, 60.1 rpy of VOC, 0.1 tpy of CO, 0.1 tpy of NO_x, 9.95 tpy of single HAPs, 23.0 tpy of total HAPs, and 23.0 tpy of Acetone. This is the first minor source permit issued to this facility.

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 current/pending enforcement actions for this facility.

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? N/A

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*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-12	NO _x , CO, VOC	NSPS JJJJ
	HAPs	NESHAP ZZZZ

10. PERMIT SHIELD – TITLE V PERMITS ONLY: (N/A – Minor Source permit)

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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 ADEQ Air Permit Screening Modeling Instructions.

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: N/A

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
SN-01, SN-02, SN-03, SN-04, SN-05, SN-06, SN-07, SN-08, SN-09, SN-10, SN-11	Balance/Usage		-	-	None
SN-12	AP-42 1.4-1	7.6 lb PM/PM ₁₀ /MMBtu	-	-	None
Air Make-up Units (Insignificant Activity)		0.6 lb SO ₂ /MMBtu 5.5 lb VOC/MMBtu 84.0 lb CO/MMBtu 100.0 lb NO _x /MMBtu			

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
No test 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)
No monitoring or CEM 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)
Facility	60.1 tpy of VOC 9.95 tpy of single HAP		Monthly	N

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SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	23.00 tpy of total HAPs 23.00 tpy of Acetone			
12	Hours of operation	500 total hours per calendar year	Monthly	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 03, 04, 05, 06, 07, 08, 09, 10, 11, 12	20%	Reg.19.503 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Inspector Observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
N/A – this is the first minor source permit issued to this facility.	

19. GROUP A INSIGNIFICANT ACTIVITIES:

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

Source Name	Group A Cat.	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Booth Air Makeup Units (8 each) (20.4 MMBtu/hr combined)	A-1	0.71	0.09	0.49	7.36	8.76	0.158	0.0993
Plantwide MDI Emissions	A-13						0.0000017	
Fabrication Dust Rooms (4 ea)	A-13	0.9	0.9					
Trailer Shot Blast Filtration System	A-13	0.7	0.7					
Plasma Arc Cutting Baghouse	A-13	0.0049	0.0049			0.0019		
Plantwide Welding Operations	A-13	0.58	0.58				0.13	0.00019

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2388-A-REG315

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

