

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2388-AOP-R0 AFIN: 45-00251

1. PERMITTING AUTHORITY:

Division 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:

Shawn Hutchings

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
9/24/2021	Initial Title V	Only annual limit increases

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. With this permit the facility is moving from a minor source permit to a Title V permit and becoming a major source of HAPs. Emissions increased 37.4 tpy of VOC, 25 tpy of Acetone, and 27 tons of HAPs.

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 referred to enforcement as parts of the application indicated the facility had exceeded permit limits on HAPs in a single month and became a major source of HAPs.

The facility was operating under an interim authority to operate as a Title V as applied for in the application for this permit. That interim authority expired and another is currently active. The facility was referred to enforcement for operating as a Title V in the period between the two interim authorities.

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

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)
Trailer Manufacturing	HAPs	Subpart MMMM
Boat Manufacturing	HAPs	Subpart VVVV

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 Rule 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N
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
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
No controls		

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:

The non-criteria pollutants listed below were evaluated. Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality 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	42.5	4.6	41	No
Cobalt	0.02	0.0022	18.6	No
Acetone	1,781	196	33.4	Yes
MDI	0.051	0.00561	0.001	Yes

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 Division of Environmental Quality to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL (µg/m ³) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m ³)	Pass?
Styrene	425.9	301.6	Y
Cobalt	0.2	0.151	Y

c) H₂S Modeling: N/A.

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01-11	Usage Limits and equipment capacity	None	None	N/A	

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

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)
None				

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)
01-11	VOC Emissions	95 tpy	Monthly	Y
01-11	Boats per day	Aluminum Boats 5 per day Fiberglass Boats 5 per day Trailers 10 per day	Monthly/Daily	Y
01-11	HAP annual emissions	25 tpy styrene 0.01 cobalt 25 others	Monthly	Y
01-11	Acetone	50 tpy	Monthly	Y
01-11	HAPs TLV less than 1	PAER lb/hr rate	Daily usage record. Monthly calculations	Y
01-11	MMMM Records	See Permit	Monthly	Y
01-11	VVVV Records	See Permit	Monthly	Y

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01-11	5%	Department Guidance	Weekly Opacity readings

20. DELETED CONDITIONS:

Former SC	Justification for removal
	Initial Title V no conditions were deleted.

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	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Booth Air Makeup Units (8 each) (20.4 MMBtu/hr combined)	A-1	0.8	0.1	0.5	7.4	8.8	0.1	0.1
Fabrication Dust Rooms (4 ea)	A-13	0.9						
Trailer Shot Blast Filtration System	A-13	0.7						
Plasma Arc Cutting Baghouse	A-13	0.0049						
Plantwide Welding Operations	A-13	0.59						

Permit #: 2388-AOP-R0

AFIN: 45-00251

Page 7 of 7

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 #
2388-A

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Advanced Marine Performance, LLC
 Permit #: 2388-AOP-R0
 AFIN: 45-00251

\$/ton factor	25.13	Annual Chargeable Emissions (tpy)	147.6
Permit Type	Initial Permit	Permit Fee \$	1999.188

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 checked="" type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	\$1,710
Total Permit Fee Chargeable Emissions (tpy)	62.2
Initial Title V Permit Fee Chargeable Emissions (tpy)	147.6

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	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		2.1	0.1	-2		
PM ₁₀		2.1	0.1	-2	-2	0.1
PM _{2.5}		0	0	0		
SO ₂		0.1	0	-0.1	-0.1	0
VOC		60.1	97.5	37.4	37.4	97.5
CO		0.1	0	-0.1		
NO _x		0.1	0	-0.1	-0.1	0
Total HAP	<input type="checkbox"/>	23	25	2		

