

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0926-AR-6 AFIN: 03-00070

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

EZ Loader Custom Boat Trailers, Inc.
6533 Highway 126 North
Midway, Arkansas 72651

3. PERMIT WRITER:

Andrea Sandage

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Travel Trailer and Camper Manufacturing
NAICS Code: 336214

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
4/2/2019	Deminimis	Increase VOC content in primer

6. REVIEWER'S NOTES:

EZ Loader Custom Boat Trailers, Inc. owns and operates a boat trailer manufacturing facility located at 6533 Highway 126 North in Midway, Arkansas 72651. With this de minimis application, the facility proposes to increase the VOC content in primer coatings (SN-02 and SN-09).

The total permitted emission increases include 8.8 tpy of VOC.

Permit and SOB created with new template which resulted in new general conditions.

Primer VOC was increased. No increase in primer 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 inspected on January 10, 2019 and no violations were identified.

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? **Y/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*

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
None		

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. 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:

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLV) that pass the PAER or PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

The TLV table was not updated for R6 and therefore no modeling was performed.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
02 09	Material Mass Balance MSDS	Ready-to-spray Primer 6.5 lb/gal VOC 3.8 lb/gal HAP Solvent 5.4 lbs/gal VOC 5.4 lbs/gal HAP	None	N/A	Primer usage 1.2 gal/hr both booths 7280 gal/yr Solvent usage 1.5 gal/hr for primer and paint booths 4032 hr/yr
03 10	Material Mass Balance	Ready-to-spray Paint 3.8 lb/gal VOC 3.8 lb/gal HAP	None	N/A	
07 08	Sandblasting	Various	None	N/A	Uncontrolled

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

14. 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				

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)
Facility wide	VOC Emissions	58.7 tpy	Monthly	Y
	Single HAP Emissions	9.50 tpy		
	Combined HAPs Emissions	23.75 tpy		
	Acetone	7,200 gal/yr		

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02, 03, 09, 10	10%	Department Guidance & §18.501	Observation
07, 08	20%		

17. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

18. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities. There were no revisions for this permit. Historical document search did not result in any calculations for these sources.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Welding	A-7							
#2 Primer Booth Burner (SN-09)	A-1							
#4 Paint Booth Burner (SN-10)	A-1							
Crossdraft Oven Tunnel (SN-11)	A-1							

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19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
0926-AR-5

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: EZ Loader Custom
Boat Trailers, Inc.
Permit Number: 0926-AR-6
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			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	49.9	58.7
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	8.8	
Minimum Initial Fee \$	500			
		Permit Fee \$	400	
Check if Administrative Amendment	<input type="checkbox"/>	Annual Chargeable Emissions (tpy)	58.7	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	1.5	1.5	0
PM ₁₀	1.5	1.5	0
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	49.9	58.7	8.8
CO	0	0	0
NO _x	0	0	0
Single HAP	9.5	9.5	0
Total HAPs	23.75	23.75	0
Acetone	20	20	0