

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1317-AR-8 AFIN: 10-00079

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Alumacraft Boat Co.
1329 North 10th Street
Arkadelphia, Arkansas 71923

3. PERMIT WRITER:

Alexander Sudibjo

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
7/20/2018	Modification	Increased production

6. REVIEWER'S NOTES:

With this modification, the facility is planning to increase production and therefore VOC emissions associated with the increased product usage. Additionally, this modification updates the insignificant activities list to include welding activities and removing sources that are no longer at the facility. The facility's permitted annual emissions are increasing by 1.0 tpy PM/PM₁₀ and 30.0 tpy VOC. The facility's permitted annual emissions are decreasing by 20.43 tpy acetone and 18.42 tpy total HAPs.

7. COMPLIANCE STATUS:

As of July 20, 2018, there are no compliance issues with the 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?

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)
N/A		

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

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

(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
N/A		

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:

The facility does not have any H₂S emissions.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	Mass Balance	MSDS	-	-	387040: 4240 gal/yr MEK: 788.8 gal/yr
02	Mass Balance	MSDS	Filter	99.48% PM/PM ₁₀	19252GWA: 9008 gal/yr
03	Mass Balance	MSDS	Filter	99.48% PM/PM ₁₀	19252GWA: 46 gal/yr
04	Mass Balance	MSDS	-	-	387040: 9540 gal/yr MEK: 1774.8 gal/yr
05	Mass Balance	MSDS	Filter	99.48% PM/PM ₁₀	19120GWA: 2764 gal/yr 00707YEP: 742 gal/yr 00700CEH: 100 gal/yr MAK: 280 gal/yr
06	Mass Balance	MSDS	Filter	99.48% PM/PM ₁₀	MAK: 560 gal/yr 00700CEH: 200gal/yr 24150BXX-5: 12 gal/yr 397479: 212 gal/yr 385098: 136 gal/yr 385064: 20 gal/yr 22764ZXX-5: 400 gal/yr 19192KWA: 388 gal/yr 19575AWA: 216 gal/yr 398839: 560 gal/yr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
					397428: 220 gal/yr LV650 Silver metallic: 1760 gal/yr 393710: 536 gal/yr 393711: 316 gal/yr FLNA95339TC: 200 gal/yr 01129CHD: 12 gal/yr FLNA40617: 180 gal/yr FLNA94607: 132 gal/yr FLNA40617BC: 24 gal/yr 23266WXX-X: 400 gal/yr 24127GXX-5: 4 gal/yr 483495: 16 gal/yr FRD09:UHTC: 312 gal/yr FLNA92814TC: 1764 gal/yr FLNA84893TC: 228 gal/yr 19562WXX-X: 376 gal/yr 09222CMU-01: 720 gal/yr 22609AWA: 152 gal/yr 24107AXX-X: 160 gal/yr H-5087-5: 192 gal/yr H-5091-7: 192 gal/yr 18380ZXX: 192 gal/yr 23917TXX-5: 192 gal/yr
07	Mass Balance	MSDS	-	-	19189TWA: 44 gal/yr 19959TWA: 72 gal/yr 19952YWA: 140 gal/yr
08	Mass Balance	MSDS	-	-	38081: 18 gal/yr 245913: 22.26 gal/yr S-5366: 870 gal/yr
09	Mass Balance	MSDS	Filter	99.48% PM/PM ₁₀	19143GMZ: 1986 gal/yr 18675CMU: 1986 gal/yr
01-09	Mass Balance	MSDS	-	-	3744 hr/yr

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

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)
N/A				

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	Pollutant Content Limit	VOC: 7.19 lb/gal Acetone: 2.76 lb/gal Benzene: 0.01 lb/gal Diisocyanate: 7.74 lb/gal Ethylbenzene: 0.88 lb/gal Methyl Isobutyl Ketone: 0.09 lb/gal Styrene: 0.51 lb/gal Toluene: 0.10 lb/gal Xylene: 4.04 lb/gal Other HAPs: 0.00 lb/gal	Monthly	N
	VOC Emissions	90.1 tpy	Monthly	N
	Acetone Emissions	1.87 tpy	Monthly	N
	Total HAPs Emissions	5.08 tpy	Monthly	N

Permit #: 1317-AR-8

AFIN: 10-00079

Page 7 of 7

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 #
1317-AR-7

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

