

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1581-AR-5 AFIN: 54-00132

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Euramax International, Inc.
215 Phillips County Road 324
Helena-West Helena, Arkansas 72342

3. PERMIT WRITER:

Bart Patton

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers
NAICS Code: 332812

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
6/30/2017	Deminimis	Recalculated and De-bubbled VOCs at SN-04, SN-05, and SN-06

6. REVIEWER'S NOTES:

This permit modification makes the following changes:

- Recalculates emissions at SN-04 through SN-06 with current emission factors at 8,760 hours/year usage of natural gas
- Removes recordkeeping requirements for natural gas combustion at SN-04 through SN-06

- Replaces the VOC bubble at SN-04 through SN-06 with individual VOC limits at each source, with SN-04's emissions being split into a solvent usage process (SN-04A) and a natural gas combustion process (SN-04B)
- Changes recordkeeping for the HAP bubble at SN-04 through SN-06, so that HAP emissions from solvent usage are recorded, and then added to potential-to-emit values for natural gas combustion at SN-04 through SN-06
- Recalculates emissions at the solvent usage process at SN-04A to include CO
- Updates TLV values in Specific Condition #19 using 2017 ACGIH values.
- Corrects CAS number and TLV for Vinylidene Chloride in Specific Condition #19
- Removed Phthalic Anhydride from Specific Condition #19 because its current TLV is below the threshold applicable to Specific Condition #19, and it will be governed now by Specific Condition #21
- Updated Specific Condition #21 to reference the ACGIH handbook edition used
- Updated Specific Condition #9 to include the permit number which began the testing requirement for SN-04

Annual emissions increases are as follows: 27.2 tpy CO.

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 under a CAO for recordkeeping violations, closed January 4, 2018. This permit addresses those recordkeeping requirements.

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)
07	HAPs from gasoline	NESHAP CCCCCC
Facility	VOC	NSPS TT

10. 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? N/A
If not, explain why.

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

Include the results for any ambient air evaluations or modeling. Include NSR/PSD permits and permits that require an evaluation in accordance with revisions to 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.

a) Reserved.

b) Non-Criteria Pollutants:

New modeling was not done at R5. The following information is from R3 and previous permits.

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.

Screening modeling for HAPs was performed to confirm that the expected emission levels at R3 would not lead to unacceptably high concentrations. Sources were placed at 716079m E, 3821934m N, chosen by estimation based on the location for SN-04 on the plot plan submitted. (Source location coordinates submitted on the emission rate tables were rounded by the facility to the nearest kilometer and did not appear to be located on property owned by the facility.) SN-04 was modeled at 50.0 lb/hr of a generic HAP. SN-05 was combined with SN-06 because it was reported as venting to an oven not an external stack, so no exit (stack) data was provided. SN-05/SN-06 was modeled at 0.05 lb/hr generic HAP. For the years used for meteorological data (2005-2009), the second highest concentration was 19.501 $\mu\text{g}/\text{m}^3$. (Highest was 21.173.) This is sufficient to substantiate 3.26 mg/m^3 , the TLV used as the upper end in Specific Condition #19 of the permit.

c) No further modeling was necessary.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
04	Oxidizer	200 gal/hr max usage 10.0 lb/gal max coating density 50 lb/hr max per HAP	Thermal oxidizer	97.5%*	
04	Natural Gas combustion	1020 MMBtu/MMscf NG AP-42, 1.4-1 and -2	None	N/A	32.5 MMBtu/hr 8760 hr/yr
05	Natural Gas combustion	7.6 lb PM/MMscf 7.6 lb PM ₁₀ /MMscf 0.6 lb SO ₂ /MMscf	None	N/A	5.15 MMBtu/hr 8760 hr/yr
06	Natural Gas combustion	5.5 lb VOC/MMscf 84 lb CO/MMscf 100 lb NO _x /MMscf	None	N/A	20.473 MMBtu/hr 8760 hr/yr
07	MSDS provided by the facility	Vapor weight Benzene 0.52539% Ethyl Benzene 0.06313% Hexane 4.42761% Toluene 0.84213% Xylene 0.23501% 2,2,4-Trimethylpentane 0.35315% Cumene 0.01565% Styrene 0.08817% MTBE 3.51957%	None	N/A	From TANKS, working loss = 42.85 lb VOC/year. Breathing loss = 100.19 lb VOC/year.

* Proposed by the permittee before installation. This value was substantiated by testing.

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
04	VOC	EPA Method 25 or 25A	Initial; thereafter, every 5 years	NSPS Subpart TT

For the testing performed in April 2016 at SN-04, the actual tested throughput of 2,759 gallons/day was lower than the 90 percent throughput threshold in Specific Condition #15 of the permit and resulted in a limitation of 3,035 gallons/day, per a letter from ADEQ Air Compliance dated June 13, 2016.

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)
04	Operating Temperature	CEM	Continuously (SC #7)	N
04	Pressure Differential	Pressure Gauge	Every 5 minutes during a 1-hour period, every 6 months (SC #22)	N

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)
Plant-wide	VOC emissions	94.6 tpy	monthly	N
Plant-wide	HAP emissions	9.50 tpy single 23.75 tpy combined	monthly	N
Plant-wide	Solvent/coating usage	4800 gal/day, or per SC #17	daily	N
07	Gallons of gasoline used	5,200 gallons/year	monthly	N

Permit #: 1581-AR-5

AFIN: 54-00132

Page 6 of 6

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
04-06	5%	Dept. Guidance	weekly observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
	None

19. 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
3.0 MMBtu/hr burners on Tanks 5 and 6	1	< 0.5	< 0.5	< 0.5	2.2	2.7	< 0.1	
Diesel Storage Tank (100-gallon cap)	2			7.5 E-05			7.5 E-05	
“Wet” Section Tanks 1, 1A, 2, 2A, 3, 3A, 4, 5, and 6	4							
Laboratory Hood and Lab Oven	5			0.044				
Roller Trimmer Lathe	13	2.82						
Cooling Tower	13	0.09						
Methyl Ethyl Ketone (MEK) Rub	13	3.91		0.682			0.322	0.322

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 #
1581-AR-4

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Euramax International,
Inc.

Permit Number: 1581-AR-5

AFIN: 54-00132

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	94.6	94.6
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	94.6	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	2.8	2.8	0
PM ₁₀	2.8	2.8	0
PM _{2.5}	0	0	0
SO ₂	1.5	1.5	0
VOC	94.6	94.6	0
CO	21.6	48.8	27.2
NO _x	26	26	0
All HAPs	23.75	23.75	0