

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2256-AR-3 AFIN: 03-00499

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Supreme Manufacturing, LLC  
54 Dillard Drive  
Midway, Arkansas 72651

3. PERMIT WRITER:

Amanda Leamons

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
9/30/2022	Initial	N/A – same facility moved to new address

6. REVIEWER'S NOTES:

Supreme Boats, Inc. (Supreme) produces fiberglass River Boats and fiberglass hoods for trucks. This permit modification allows Supreme to move their entire operation from the Mountain Home location to the new operating location in Midway. Supreme Manufacturing, LLC will continue their exact same operation at the Midway location. While most permitted air emission limits will remain the same, the permitted limit for total air contaminants will increase 0.01 tons per year due to a rounding correction.

## 7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

Last inspection for Supreme and the Mountain Home (03-00445) location was in August of 2022 and the facility was found to be in compliance. There are no ongoing, active, or pending enforcement or compliance issues/activities for this facility at the new location.

## 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  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  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. UNCONSTRUCTED SOURCES:

Minor Source, New Permit, All sources will be moved from Mountain Home to new Midway facility

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
N/A				

## 11. PERMIT SHIELD – TITLE V PERMITS ONLY: N/A

## 12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY: N/A

## 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:

Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H<sub>2</sub>S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H<sub>2</sub>S Standards N

If exempt, explain: N/A This facility does not emit H<sub>2</sub>S.

## 15. CALCULATIONS:

SN	Emission Factor Source	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Gel Coat	UEF	<u>Pneumatic:</u> 2,000 gal/yr Styrene: 543 lb/ton gel MM: 90 lb/ton gel <u>Hand:</u> 2,000 gal/yr Styrene: 305 lb/ton gel MM: 90 lb/ton gel	None		
Resin	UEF	<u>Pneumatic:</u> 10,000 gal/yr Styrene: 140 lb/ton gel 35% styrene	None		
8% Wax Solution	MSDS	200 gal/yr Assumed 100% emitted 92% (wt.) styrene 6.87 lb <sub>VOC</sub> /gal	None		

SN	Emission Factor Source	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Catalyst	MSDS	480 gal/yr 8.5% (wt.) VOC 34% MEKP 8.41 lb/gal	None		
Pourable Putty	MSDS	300 gal/yr Assumed 100% emitted 22% (wt.) styrene	None		
Mold Release	MSDS	200 gal/yr Assumed 100% emitted 50% (wt.) xylene 15% (wt.) ethylbenzene	None		
Acetone	MSDS	2,400 gal/yr Assumed 100% emitted	None		
Sanding/grinding		<u>PM/PM<sub>10</sub></u> : 0.2 tpy	Non-atmospherically venting room		Assumed emissions

## 16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

## 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)
N/A				

## 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
Facility	Gel Coat Usage	4,000 Gallons/yr	Monthly	N
	Resin Usage	10,000 Gallons/yr	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report
	8% Wax Solution Usage	200 Gallons/yr	Monthly	N
	Catalyst Usage	480 Gallons/yr	Monthly	N
	Pourable Putty Usage	300 Gallons/yr	Monthly	N
	Mold Release Usage	200 Gallons/yr	Monthly	N
	Acetone Usage	2,400 Gallons/yr	Monthly	N
	Max Gel Coat Contents	Density: 11.5 lb/gal 45% Styrene 6% MMA	Monthly	N
	Max Resin Contents	Density: 10.85 lb/gal 35% Styrene	Monthly	N
	8% Wax Solution Contents	Density: 7.47 lb/gal 92% Styrene	Monthly	N
	Catalyst Contents	Density: 8.41 lb/gal 8.5% VOC by weight 34% MEKP by weight	Monthly	N
	Pourable Putty Contents	Density: 9.42 lb/gal 22% Styrene	Monthly	N
Mold Release Contents	Density: 7.26 lb/gal 50% Xylene 15% Ethylbenzene	Monthly	N	

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
Facility	20%	Rule 19.503	Inspector Observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
	None

21. GROUP A INSIGNIFICANT ACTIVITIES:

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

[illegible]

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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 #
2256-AR-2

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Supreme Manufacturig,  
LLC  
Permit Number: 2256-AR-3  
AFIN: 03-00499

			<b>Old Permit</b>	<b>New Permit</b>
\$/ton factor	27.27	Permit Predominant Air Contaminant	12.7	12.7
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
		Permit Fee \$	400	
Check if Administrative Amendment <input type="checkbox"/>		Annual Chargeable Emissions (tpy)	12.7	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0.2	0.2	0
PM <sub>10</sub>	0.2	0.2	0
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	0	0	0
VOC	12.7	12.7	0
CO	0	0	0
NO <sub>x</sub>	0	0	0
Total Air Contaminates*	9.8	9.81	0.01
Ethylbenzene	0.11	0.11	0
Methyl Methacrylate	1.04	1.04	0
Styrene	9.67	9.67	0
Xylene	0.36	0.36	0