



DIVISION OF ENVIRONMENTAL QUALITY

DRAFT MINOR SOURCE AIR PERMIT

PERMIT NUMBER: 2256-AR-3

IS ISSUED TO:

Supreme Manufacturing, LLC

54 Dillard Drive

Midway, AR 72651

Baxter County

AFIN: 03-00499

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DIVISION OF ENVIRONMENTAL QUALITY'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. § 8-4-101 *ET SEQ.*) AND THE RULES PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

David Witherow, P.E.
Associate Director, Office of Air Quality
Division of Environmental Quality

Date

Supreme Manufacturing, LLC
Permit #: 2256-AR-3
AFIN: 03-00499

Table of Contents

Section I: FACILITY INFORMATION	4
Section II: INTRODUCTION.....	5
Summary of Permit Activity	5
Process Description.....	5
Rules and Regulations.....	6
Total Allowable Emissions	6
Section III: PERMIT HISTORY	7
Section IV: EMISSION UNIT INFORMATION.....	8
Section V: INSIGNIFICANT ACTIVITIES	10
Section VI: GENERAL CONDITIONS	11

Supreme Manufacturing, LLC
Permit #: 2256-AR-3
AFIN: 03-00499

List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	Arkansas DEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
HAP	Hazardous Air Pollutant
Hp	Horsepower
lb/hr	Pound Per Hour
NESHAP	National Emission Standards (for) Hazardous Air Pollutants
No.	Number
NO _x	Nitrogen Oxide
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate Matter Equal To Or Smaller Than Ten Microns
PM _{2.5}	Particulate Matter Equal To Or Smaller Than 2.5 Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Supreme Manufacturing, LLC
Permit #: 2256-AR-3
AFIN: 03-00499

Section I: FACILITY INFORMATION

PERMITTEE: Supreme Manufacturing, LLC

AFIN: 03-00499

PERMIT NUMBER: 2256-AR-3

FACILITY ADDRESS: 54 Dillard Drive
Midway, AR 72651

MAILING ADDRESS: P O. Box 1220
Mountain Home, AR 72654

COUNTY: Baxter County

CONTACT NAME: Chris Miller

CONTACT POSITION: Plant Manager

TELEPHONE NUMBER: (870) 507-0902

REVIEWING ENGINEER: Amanda Leamons

UTM North South (Y): Zone 15: 4026229.90 m

UTM East West (X): Zone 15: 549135.98 m

Section II: INTRODUCTION

Summary of Permit Activity

Supreme Boats, Inc. (Supreme) produces fiberglass River Boats and fiberglass hoods for trucks located at 54 Dillard Dr., Midway, AR 72651. 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.

Process Description

The boat manufacturing process employed by Supreme starts with the preparation of reusable molds that are the receiving substrates for the raw materials used to form the hull of the boats. First, a layer of wax is applied to the mold. Gel coat is then sprayed (airless spray gun) into the mold, and allowed to cure.

Once the Gel Coat is cured, the process continues with the application of several layers of reinforcing materials (fiberglass mat), which are wetted through the mechanical application of polyester resin, using a chopper gun, adjusted to spray resin only. Once these layers of reinforcing materials are cured, precut wooden pieces are manually installed and covered with several layers of chopped strand mat (roving) and resin (applied with the pneumatic chopper gun), to form the floors, transom, and decks of the hull.

Finally, the entire hull is covered with several layers of reinforced fiberglass resin applied through the pneumatic chopper gun. Once the boat hardens, it is pulled from the mold. The rough surfaces are sanded, and the debris is swept up off the floor. The boat is then manually gel coated, using a nap type roller.

Grinding and sanding operations at this location are performed in a non-atmospherically venting room within the plant. The particulate matter generated from this process falls to the floor, and is swept up and disposed of by employees.

Once the final gel coat layer cures, the boat is ready for final assembly. The entire boat is placed on a trailer, and moved to the Final Assembly area where purchased (outsourced) hardware and trim is assembled. The boat is then ready for shipment to the customer.

The above process is repeated for each boat. The molds are cleaned periodically, using Acetone.

Emissions from the Hull Layup area (gel coat and resin) are exhausted from the area by three general exhaust fans (not stacks) mounted horizontally, through the walls of the building. Because this is a relatively small manufacturing operations, all above described processes are performed in the same general areas within the building.

In addition to the river boat building process outlined above, Supreme also has the capacity to manufacture fiberglass truck hoods. The fiberglass truck hood manufacturing operations are almost identical to the boat manufacturing process, and only abbreviated to the extent that the truck hoods do not include all the assembly components that are required with the river boats.

Supreme Manufacturing, LLC
Permit #: 2256-AR-3
AFIN: 03-00499

Small Liquefied Petroleum fired heating units are used to heat the shop. These units are classified as a Group A-1 Insignificant Activity.

Rules and Regulations

The following table contains the rules and regulations applicable to this permit.

Rules and Regulations
Arkansas Air Pollution Control Code, Rule 18, effective March 14, 2016
Rules of the Arkansas Plan of Implementation for Air Pollution Control, Rule 19, effective May 6, 2022

Total Allowable Emissions

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	0.2	0.2
PM ₁₀	0.2	0.2
PM _{2.5}	See Note*	
VOC	6.1	12.7
Total Air Contaminates*	4.71	9.81
Ethylbenzene	0.06	0.11
Methyl Methacrylate	0.50	1.04
Styrene	4.65	9.67
Xylene	0.18	0.36

*PM_{2.5} limits are source specific, if required. Not all sources have PM_{2.5} limits.

Supreme Manufacturing, LLC
Permit #: 2256-AR-3
AFIN: 03-00499

Section III: PERMIT HISTORY

Permit #2256-A-REG315	Shawnee Boats (Old AFIN# 03-00445) had a registration, 2256-A-REG315, for the facility located at 91 Webber Lane, Mountain Home, AR 72653 which was issued on August 15, 2011.
Permit #2256-A	This was the first minor source permit for Shawnee Boats, Inc. It was issued on January 17, 2014.
Permit #2256-AR-1	This permit modification was issued July 3, 2019 and allowed the facility to increase the styrene content in the gel coat and resin products. This permit also lowered the annual throughput for gel coats and resins to remain a minor source. The annual permitted emissions increased by 0.02 tpy of Acetone, 0.52 tpy of Total HAPs, and 0.72 tpy of Single HAP (Styrene), and 1.5 tpy of VOC.
Permit #2256-AR-2	This permit modification was issued September 14, 2020 and allowed Supreme (formerly Shawnee Boats) to move the operations from Midway back to the original facility location in Mountain Home. With this modification, the MSDSs for the raw materials were updated and calculations of VOC and non-criteria air pollutants were updated. Overall annual permitted emissions will decrease 1.9 tons of VOC and 0.01 ton of styrene; while emissions will increase 1.87 tons of total air contaminants.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. [Rule 19.501 *et seq.* and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
Facility	All Processes (Gel Coat Usage, Resin Usage, 8% Wax Solution Usage, Catalyst Usage, Pourable Putty Usage, Mold Release Usage, Acetone for Cleanup, and Sandblasting)	PM ₁₀	0.2	0.2
		VOC	6.1	12.7

2. The permittee shall not exceed the emission rates set forth in the following table. [Rule 18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
Facility	All Processes (Gel Coat Usage, Resin Usage, 8% Wax Solution Usage, Catalyst Usage, Pourable Putty Usage, Mold Release Usage, Acetone for Cleanup, and Sandblasting)	PM	0.2	0.2
		Total Air Contaminates*	4.71	9.81
		Ethylbenzene	0.06	0.11
		Methyl Methacrylate	0.50	1.04
		Styrene	4.65	9.67
		Xylene	0.18	0.36

*Includes acetone and other air contaminants, does not include any HAPs.

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Limit	Regulatory Citation
Facility	20%	§19.503

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Rule 18, if the emission of the air contaminant constitutes air pollution

within the meaning of Ark. Code Ann. § 8-4-303. [Rule 18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Rule 18.901 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. The permittee shall not use any product that exceeds the limits in the table below.[Rule 19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Product	Max. Density (lb/gal)	Max. VOC/HAP Content (%) by weight
Gel Coat	11.5	Styrene 45%
		Methyl Methacrylate 6%
Resin	10.85	Styrene 35%
8% Wax Solution	7.47	Styrene 92%
Catalyst	8.41	VOC 8.5%
		MEK Peroxide 34%
Pourable Putty	9.42	Styrene 22%
Mold Release	7.26	Xylene 50%
		Ethylbenzene 15%

7. The permittee shall not exceed the throughput for the products listed in the table below at the facility per rolling 12 month period. [Rule 19.705, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 70.6]

Product	Annual Limit (Gallons)
Gel Coat	4,000
Resin	10,000
8% Wax Solution	200
Catalyst	480
Pourable Putty	300
Mold Release	200
Acetone	2,400

8. The permittee shall maintain monthly records to demonstrate compliance with Specific Conditions #6**Error! Reference source not found.** and #7. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Division of Environmental Quality personnel upon request. [Rule 19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Supreme Manufacturing, LLC
Permit #: 2256-AR-3
AFIN: 03-00499

Section V: INSIGNIFICANT ACTIVITIES

The Division of Environmental Quality deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Rule 18 and Rule 19 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated September 27, 2022. [Rule 19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
Small liquefied petroleum-fired heating units	A-1

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Rule 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Rule 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Rule 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the rules promulgated under the Act. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
3. The permittee shall notify the Division of Environmental Quality in writing within thirty (30) days after each of the following events: commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Rule 19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Rule 19.410(B) and/or Rule 18.309(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee must keep records for five years to enable the Division of Environmental Quality to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Division of Environmental Quality may use the records, at the discretion of the Division of Environmental Quality, to determine compliance with the conditions of the permit. [Rule 19.705 and/or Rule 18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Division of Environmental Quality electronically using <https://portal.adeq.state.ar.us> or mail them to the address below. [Rule 19.705 and/or Rule 18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Division of Environmental Quality
Office of Air Quality

Supreme Manufacturing, LLC

Permit #: 2256-AR-3

AFIN: 03-00499

ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Division of Environmental Quality. The permittee must notify the Division of Environmental Quality of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Division of Environmental Quality within sixty (60) calendar days after the completion of testing. [Rule 19.702 and/or Rule 18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall provide: [Rule 19.702 and/or Rule 18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Rule 19.303 and/or Rule 18.1104 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Division of Environmental Quality may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Rule 19.601 and/or Rule 18.1101 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Division of Environmental Quality that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, overnight delivery, or online at <https://eportal.adeq.state.ar.us>) to the Division of Environmental Quality by the

- end of the next business day after the occurrence or the discovery of the occurrence.
- c. The permittee must submit to the Division of Environmental Quality, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.
11. The permittee shall allow representatives of the Division of Environmental Quality upon the presentation of credentials: [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
- b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
- c. To inspect any monitoring equipment or monitoring method required in this permit;
- d. To sample any emission of pollutants; and
- e. To perform an operation and maintenance inspection of the permitted source.
12. The Division of Environmental Quality issued this permit in reliance upon the statements and presentations made in the permit application. The Division of Environmental Quality has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
13. The Division of Environmental Quality may revoke or modify this permit when, in the judgment of the Division of Environmental Quality, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the rules promulgated the Arkansas Water and Air Pollution Control Act. [Rule 19.410(A) and/or Rule 18.309(A) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Division of Environmental Quality and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Division of Environmental Quality denies the request to transfer within thirty (30) days of the receipt of the

disclosure statement. The Division of Environmental Quality may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Rule 19.407(B) and/or Rule 18.307(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Rule 18 and/or Rule 19 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Rule 9. [Ark. Code Ann. § 8-1-105(c)]
19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Division of Environmental Quality approval. The Division of Environmental Quality may grant such a request, at its discretion in the following circumstances:
 - a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Rule 18.314(A) and/or Rule 19.416(A), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Division of Environmental Quality approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:
 - a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;

- d. The request contains such information necessary for the Division of Environmental Quality to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
- e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
- f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Rule 18.314(B) and/or Rule 19.416(B), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Division of Environmental Quality approval. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Rule 18.314(C) and/or Rule 19.416(C), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

22. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [Rule 18.1001, Rule 19.701, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]