

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 2012-A

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
8001 National Drive
Post Office Box 8913
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Aluma -Weld dba Xpress Boats, Inc.
199 Extrusion Place
Hot Springs , Arkansas 71901

3. PERMIT WRITER:

Jim Siganos

4. PROCESS DESCRIPTION AND SIC CODE:

SIC Description: Aluminum Boat Building and Repair
SIC Code: 3732

5. SUBMITTALS: 2/21/02

6. REVIEWER'S NOTES:

7. COMPLIANCE STATUS: The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility is currently under CAO LIS 02-067.

8. APPLICABLE REGULATIONS:

A. Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera) (Y/N) N

Has this facility underwent PSD review in the past (Y/N) N Permit #

Is this facility categorized as a major source for PSD? (Y/N) N
 \$ 100 tpy and on the list of 28 (100 tpy)? (Y/N) N
 \$ 250 tpy all other (Y/N) N

B. PSD Netting

Was netting performed to avoid PSD review in this permit? (Y/N) N
 If so, indicate increases and decreases used in netting for PSD purposes only.

C. Source and Pollutant Specific Regulatory Applicability N/A

9. EMISSION CHANGES:

The following table summarizes plantwide emissions associated with this first time permitting action.

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit N/A	Air Permit 2012-A	Change
PM/PM ₁₀	-	0.20	+0.20
SO ₂	-	0.20	+0.20
VOC	-	20.02	+20.02
CO	-	2.15	+2.15
NO _x	-	2.55	+2.55
Acetone	-	2.74	+2.74

Permit #: 2012-A

CSN #: 26-0413

Page 3 of 6

10. MODELING:

A. Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

11. Non-Criteria Pollutants

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The PAER was deemed by the Department to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Ethyl - Benzene	434	47.74	1.17	Y
Formaldehyde	1.5	0.165	0.04	Y
Hexane	176	19.36	6.45	Y
MEK	590	64.9	1.0	Y
Methanol	262	28.82	0.04	Y
MIK	205	22.55	1.03	Y
Toluene	188	20.68	5.0	Y
Xylene	434	47.74	3.69	Y
Acetone	500	55.0	11.0	Y

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
101,102, 103,104, 105,106, 107, 108A, 108B, & 110	MSDS	% by weight	None	N/A	Maximum Capacity
109	AP-42	Natural Gas	None	N/A	Maximum Capacity

13. TESTING REQUIREMENTS:

This permit does not require stack testing.

14. MONITORING OR CEMS

This permit does not require monitoring or CEMS

Permit #: 2012-A

CSN #: 26-0413

Page 5 of 6

15. RECORD KEEPING REQUIREMENTS

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency *	Report (Y/N)**
101 to 107, 108A & 109	VOC and HAP content of paint, primer or thinner.	YES	Daily	N
108B	VOC content of liner material.	YES	Monthly	N
110	VOC and HAP content of carpet glue and solvent.	YES	Monthly	N

* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

** Indicates whether the item needs to be included in reports

16. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
109	20	Dept guidance	Daily observation

17. DELETED CONDITIONS:

N/A: First time Permit.

18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

List all active permits for this facility which are voided/superseded/subsumed by issuance of this permit.

Permit #
First time permit

19. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Tom Rheume, P.E.