

RESPONSE TO COMMENTS

Aluma-Weld d/b/a/ Xpress Boats, Inc.
PERMIT #2012-AR-1
AFIN: 26-00413

On July 27, 2009, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, written comments on the draft permitting decision were submitted on behalf of the facility. The Department's response to these issues follows.

Comment #1: SC 1. It appears that this condition requires a separate calculation for the glue and liner. In the application, we were attempting to have all sources covered as area source. We have constructed our inventory tracking based on this assumption. We may be able to track these use numbers on the existing worksheet, but it may become much more complex. It may be more expedient to generate separate tracking for these lines, but these may have to be stand alone documents. These are the types of issues that lead to potential errors that can result in violations. We would prefer to have these inventory/discharge requirements included as part of the overall discharge.

Response #1: Sources that have separate stacks and different processes are given separate source numbers and separate hourly emissions. In the case of spray booths, since the facility may use any of them to do the same job, the hourly emissions were combined. All facility sources have combined annual allotments with VOC/HAP calculations to show compliance. The facility only needs to keep track of components themselves. The recordkeeping conditions for each set of sources have been reduced to a single condition that applies to all.

Comment #2: SC 2. This SC requires the separate tracking of VOC and acetone. We would prefer to roll these values into our existing tracking sheet without the need to separate calculations for these discharges.

Response #2: Acetone is not a VOC, but an air contaminant, which is tracked separately. The facility has Plantwide wide limits for VOC, HAP, and Acetone rather than separate, source-specific annual limits. The requirement to separately track VOC and acetone remains in the final permit.

Comment #3: SC 5. Paint Additives limit is listed as 6.93 and Paint Accelerator MSDS is 7.752. Paint limit states 5.06 VOC while Acrylic Urethane (45039) MSDS is 7.68. Primer is listed as 6.72 VOC and Urethane MSDS is listed at 7.68 VOC. Thinner is listed at 7.39 while solvent mixture thinner MSDS is listed at 7.68. Each one of these would be a separate violation. We suggest that the permit be changed to reflect the higher values.

Response #3: The additive VOC/HAP limit has been increased to 7.76 lb/gal and the primer limit has been increased to 7.68 lb/gal (rounded up). The Urethane MSDS shows a content of 4.16 lb/gal limit and the thinner a content of 7.18 lb/gal, which are well within the content limits of the permit. The table was also clarified to assume that all HAP is also VOC.

Comment #4: SC 9. Will it be necessary to generate a separate tracking sheet in order to comply with SC?

Response #4: The facility will need to track the VOC, acetone, and HAP content of the components used at SN-101 through SN-108 and SN-112, but the facility's annual limits are on a Plantwide basis.

Comment #5: SC 10. Resin coatings have a total VOC of under 0.8 lbs/gal. Our XtremeCoat #1227 Iso part "A" is .76 lbs/gal and the part "B" resin is .26 lbs/gal., resulting in a total of 1.02 lbs/gal. We need to change this requirement to avoid any confusion that may result as to the intent of the requirement.

Response #5: The condition was written with the intention of only limiting a single component, but the facility is correct in that the best approach is to limit the VOC content of both parts together. The VOC content has been changed to 1.02 lb/gal.

Comment #6: SC 12. Carpet Glue is listed with limits of 2.52 lbs/gal. The MSDS lists the glue as 2.63 lbs/gal. VOC. Some glue suppliers are as high as 4.203 as listed on our spreadsheet. We suggest that these content values be listed within the table.

Response #6: MSDS supplied during the application process did not list glues with these specific contents. Furthermore, the adhesive listed above contains both toluene (a HAP) and acetone. The permit has been changed to reflect a higher VOC, HAP, or acetone content limit of 4.21 lb/gallon.

Comment #7: SC 14. Compliance with this SC will require a separate calculation sheet that will duplicate some of the inputs already contained in the master worksheet. We will assess this sheet to determine the possibility of compliance with this SC.

Response #7: The facility will need to track the VOC, acetone, and HAP content of the components used at SN-101 through SN-108 and SN-112, but the facility's annual limits are on a Plantwide basis.

Comment #8: GC 7, 8 & 9. It appears that these general conditions require stack testing and the installation of stack monitoring equipment, as well as the required maintenance of this monitoring equipment. However, under Section

“Statement of Basis”, item 9 lists requirements as “none”. We request these sections be changed to remove the stack testing requirements.

Response #8: These conditions are part of the standard language of all minor source permits and are not intended to confer testing requirements upon the facility. If the facility were to be required to test, testing conditions would be listed in the specific conditions of Section IV. The general conditions of the permit will not be changed.

Comment #9: Due to changes in the paint usage estimates and glue content limits, modeling has to be re-examined. Furthermore, the facility may use resins that contain MDI, which, according to the supplier, are polymerized within the gun and are not emitted as MDI. The TLV condition, as written, would exclude these components from use.

Response #9: Additional HAP emissions from the paint operations and gluing were added to the modeling. The model was also modified to reflect actual operating hours of the facility. The minimum allowable TLV was changed to 38.0 ug/m³.

The TLV limit of the permit does not allow components that may contain MDI, but, due to polymerization that occurs within the spray gun itself, would not be emitted (as HAP or VOC). The condition has been written to exclude MDI from the TLV minimum.



ARKANSAS
Department of Environmental Quality

October 26, 2009

Danny Kennedy
Controller
Aluma-Weld d/b/a/ Xpress Boats, Inc.
199 Extrusion Place
Hot Springs, AR 71901

Dear Mr. Kennedy:

The enclosed Permit No. 2012-AR-1 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 5/5/2008.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 2012-AR-1 for the construction, operation and maintenance of an air pollution control system for Aluma-Weld d/b/a/ Xpress Boats, Inc. to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8.603, within thirty (30) days after service of this decision.

All persons submitting written comments during the thirty (30) day, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by Regulation 8.603.

Sincerely,

A handwritten signature in black ink that reads "Mike Bates". The signature is written in a cursive style with a large, stylized "M" and "B".

Mike Bates
Chief, Air Division

ADEQ MINOR SOURCE AIR PERMIT

Permit No. : 2012-AR-1

IS ISSUED TO:

Aluma-Weld d/b/a/ Xpress Boats, Inc.
199 Extrusion Place
Hot Springs, AR 71901
Garland County
AFIN: 26-00413

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 DEPARTMENT'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. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



Mike Bates
Chief, Air Division

October 26, 2009

Date

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

Table of Contents

Section I: FACILITY INFORMATION 4

Section II: INTRODUCTION..... 5

 Summary of Permit Activity 5

 Process Description..... 5

 Regulations 6

 Total Allowable Emissions 7

Section III: PERMIT HISTORY 8

Section IV: EMISSION UNIT INFORMATION..... 9

Section V: INSIGNIFICANT ACTIVITIES 10

Section VI: GENERAL CONDITIONS 13

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

Section I: FACILITY INFORMATION

PERMITTEE: Aluma-Weld d/b/a/ Xpress Boats, Inc.

AFIN: 26-00413

PERMIT NUMBER: 2012-AR-1

FACILITY ADDRESS: 199 Extrusion Place
Hot Springs, AR 71901

MAILING ADDRESS: Same as Facility Address

COUNTY: Garland County

CONTACT NAME: Rodney Herndon

CONTACT POSITION: President

TELEPHONE NUMBER: 501-262-5300

REVIEWING ENGINEER: Paula Parker

UTM North South (Y): Zone 15: 3813285.83 m

UTM East West (X): Zone 15: 507066.53 m

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

Section II: INTRODUCTION

Summary of Permit Activity

Xpress Boats, Inc. began manufactures aluminum hull boats in a variety of models. The facility is modifying their Minor Source Air Permit to make the following changes.

Insignificant Activities

Paint Drying Ovens, SN-109, have been moved to the Insignificant Activities list as they are natural gas burning sources less than 10 MMBTU/hr. A gasoline tank has also been removed as it was never present at the facility site. The facility uses foam components in constructing the boats and has been added as an A-13 Activity.

Paint Booths, SN-101 through SN-108 and SN-112

The VOC and HAP emission limits for the paint booths have been recalculated and increased. Formulations have also changed for all components and emissions have been recalculated. Specific HAPs have been removed from the permit and replaced by generic TLV for all components. HAPs are now on a monthly recordkeeping cycle.

X-liner, SN-109

The source number has been changed from 108B to 109. The resin formulation has also changed. Emissions, both hourly and annual, have been recalculated and have been increased.

Glue Booth, SN-111

Glue formulations do not have HAPs. The glue formulation has also changed. Emissions, both hourly and annual, have been recalculated and have been increased.

Process Description

The manufacturing process involves the following unit operations:

Aluminum Cutting & Forming

Aluminum is received in sheets, and stored on premises and used as needed. The aluminum sheets are of various gauge material to be used for specific components of each boat. The sheets are cut into specific shapes and sizes then formed in hydraulic presses to be welded into boat panels.

Aluminum Welding

After forming the boat components, all seams are welded utilizing a GTAW arc welding system with shielding gas (Argon). Fumes are a minimum component and are exhausted to the outside of the building using exhaust fans. Another positive attribute of the GTAW process is that it “is very low fume formation rate (FFR)”.

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

A second welding process is also used; this is the Gas Metal Arc Welding (GMAW) utilizing a consumable electrode and a shielding gas (Argon). Welding is listed as an insignificant activity.

Paint Preparation

All aluminum surfaces are prepared by wiping with solvent cleaners to remove dirt and grease prior to painting. These emissions become non-stack (general ventilation) emissions and the permittee has conducted personal monitoring analysis to determine the extent of the releases.

Paint

After preparation, the hulls are moved into one of seven paint booths designated as 4-A, 4-B, 3-A, 3-B, 3-C, 2-A, 2-B, and 2-C. These booths are designated as SN-101 through SN-108. Touch-up and repaint work are performed in a separate booth designated as SN-112.

Carpet and Carpet Glue

Carpeting is used in most of the boats and the glue that is used becomes a building ventilation (SN-111, non-stack) emission. After the boat is painted, the shell proceeds to the glue area. The glue is applied to all walking surfaces with a pressure spray system. The glue is sprayed directly to the boat surface and the carpet is pressed into place and adhered directly to the glue covered surfaces. All carpet is then trimmed to fit. Over-spray is cleaned by hand wiping.

Liner

The liner is a two part resin coating which dries to a rubber like non-slip surface. It is used to line foot rest and walking surfaces of the boat where carpeting is not installed. The liner is applied like paint (SN-109). Emission factors are calculated the same as paint.

Finishing

Paint finishes are baked on in the bake oven (A-1 Insignificant Activity) at 1500°F. The oven is a natural gas fired unit and aids in the rapid curing of the coatings.

Final Product Assembly

After the hulls have been finished, the plant adds the mechanical and electronic components to each unit. This includes steering and cables, fuel deliver systems, electrical wiring, motors (outboard), instrumentation, windshields, and other finish components.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

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
VOC	83.6	72.8
Acetone	59.6	71.5
Single HAP	83.60	9.50
Total HAPs	83.60	23.75

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

Section III: PERMIT HISTORY

2012-A Initial permit issued on January 28, 2003. Xpress Boats Incorporated began manufacturing at this location in February 2001.

Aluma-Weld d/b/a/ Xpress Boats, Inc.
 Permit #: 2012-AR-1
 AFIN: 26-00413

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 19, §19.501 et seq., and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
101 102 103 104 105 106 107 108 112	Paint line , 4-A, 4-B, 3-A, 3-B ,3-C, 2-A, 2-B, & 2-C and Touch up Booth	VOC	51.3	72.8*
109	Xtreme Coat (Liner)	VOC	18.8	
111	Gluing Operations	VOC	13.5	

*All sources are limited to a 72.8 tpy Plantwide bubble for VOC

- The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
101 102 103 104 105 106 107 108 112	Paint line , 4-A, 4-B, 3-A, 3-B ,3-C, 2-A, 2-B, & 2-C and Touch Up	Single HAP Total HAP Acetone	51.30 51.30 46.1	9.50** 23.75** 71.5**
111	Gluing Operations	Single HAP Total HAP Acetone	13.41 13.41 13.5	9.50** 23.75** 71.5**

**All sources are limited to a 9.50 single HAP, 23.75 total HAP, and 71.5 tpy acetone Plantwide bubble

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

3. 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 Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-101 through SN-108

5. The permittee shall not use a component with VOC, single HAP, or acetone content greater than that listed in the following table. For the purposes of this table, it is assumed that all HAP is also VOC. [Regulation 19, §19.705, Regulation 18, §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Source Number	Paint	Primer	Thinner or Cleaner	Additive
SN-101 through SN-108 and SN-112	VOC or Single HAP Content Limit (lb/gal)			
	5.06	7.68	7.39	7.76
	Acetone Content Limit (lb/gal)			
	0.62	0.62	6.60	0.62

SN-109 Conditions

6. The permittee is limited to any resin coatings, including two part resin coatings, having a total VOC content no more than 1.02 lbs/gal and containing no HAP. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-111 Conditions

7. The permittee shall not use glue in SN-111 having a VOC, HAP, or acetone content greater than 4.21 lb/gal. [§19.705 of Regulation 19, §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Plantwide Conditions

8. The permittee is limited to any HAP for the components listed with a TLV (Threshold Limit Value) of 38.0 mg/m³. This condition does not apply to polyglycol resins, which may contain MDI (CAS# 101-68-8), at use in the facility. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
9. The permittee shall maintain monthly records which demonstrate compliance with the Plantwide annual VOC emissions in Specific Condition 1 and VOC content in Specific Conditions 5, 6, and 7. Monthly records shall include the name of each VOC containing material used that month, the type of material (glue, resin, paint, thinner, additive, or primer), the content VOC in the material in pounds per gallon, and the amount of each material used. The records shall include the monthly total VOC and the consecutive,

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

rolling 12 month total VOC emitted at the facility. The monthly records shall be updated by the fifteenth day of the month following the month the records represent. These records shall be kept on site, and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

10. The permittee shall maintain monthly records which demonstrate compliance with the Plantwide annual VOC emissions in Specific Condition 2 and HAP or Acetone content in Specific Conditions 5 and 7. Monthly records shall include the name of each HAP or Acetone containing material used that month, the type of material (glue, resin, paint, thinner, additive, or primer), content of any single HAP or Acetone in the material in pounds per gallon, and the amount of each material used. The records shall include the monthly and the consecutive, rolling 12 month total HAP, single HAP, and Acetone emitted at the facility. The monthly records shall be updated by the fifteenth day of the month following the month the records represent. These records shall be kept on site, and shall be made available to Department personnel upon request. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

Section V: INSIGNIFICANT ACTIVITIES

The Department 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 Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated May 5, 2008.

Description	Category
Welding	A-7
Bake Ovens (Natural Gas Fired)	A-1
250 gallon Diesel Fuel Tank	A-2
5-Gallon Containers	A-8
Foam Components	A-13

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §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 Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §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 regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after 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. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §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 Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

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 Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee shall provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §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. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §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 Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department 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, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, 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

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

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 Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §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 Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §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 Department 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 Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department 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. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §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 Department approval. The Department 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.

[Regulation 18, §18.314(A), Regulation 19, §19.416(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 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 Department approval. Any such emissions shall be included in the facilities total emissions and reported as such. The Department 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 Department 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.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

Aluma-Weld d/b/a/ Xpress Boats, Inc.
Permit #: 2012-AR-1
AFIN: 26-00413

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 Department approval. The Department 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.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to
Aluma-Weld d/b/a/ Xpress Boats, Inc., 199 Extrusion Place, Hot Springs, AR, 71901, on this
26th day of October, 2009.

Pam Owen

Pam Owen, AAIL, Air Division