STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2012-AR-4 AFIN: 26-00413

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

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

3. PERMIT WRITER:

Kyle Bygness

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
6/11/2026	De Minimis	Add a paint booth (SN-115)

6. REVIEWER'S NOTES:

- This modification will allow the installation and operation of a console paint booth and dryer (SN-115) within the current "emissions bubble". The dryer has a rating of 1.4 MMBTU/hr. Permitted emissions are increasing by 0.1 tpy of PM_{10}, 0.1 tpy SO2, 0.1 tpy of VOC, 0.5 tpy of CO, 0.6 tpy of NOx and 0.02 tpy of Combustion HAPs.
- The emissions of the natural gas dryer (SN-115) were calculated using AP-42 1.4

7. COMPLIANCE STATUS:

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

The last inspection document in EPA ECHO was conducted on June 5th, 2025, and noted that welding operations not addressed in the permit as an emissions source were occurring in a trailer manufacturing area co-located with the permittee's facility. Since then, welding was added as an insignificant activity in revised permit 2012-AR-3

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?

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)
SN-114	VOC	NESHAP Subpart CCCCCC

10. UNCONSTRUCTED SOURCES:

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:

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 8 CAR pt. 40 requirement.)

Source	Inapplicable Regulation	Reason
N/A		

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
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 Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.
The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER 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 × TLV	Proposed lb/hr	Pass?
Benzene	0.06	0.0066	0.31000288	No
Chromium	0.51	0.0561	0.00690512	Yes
Cadmium	0.01	0.0011	0.00041747	Yes
Cobalt	0.02	0.0022	0.003400115	No
Hexane	172	18.92	0.31247	Yes
Naphthalene	52	5.72	0.120000837	Yes
Manganese	0.02	0.022	0.041300522	No
Nickel	1.5	0.165	0.041300688	No
Toluene	75.3	8.28	2.18000467	Yes
Xylene	86.8	9.548	0.94	Yes
POM	0.2	.022	1.21E-07	Yes

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Division of Environmental Quality to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Benzene	0.6	29.19823	No
Cadmium	0.1	0.005733	Yes
Cobalt	0.2	0.04873	Yes
Manganese	0.2	0.09012	Yes
Nickel	16.5	0.56315	Yes

*Using 2016 meteorological data there were 14 exceedances of the PAIL beyond the fence line of the facility. The exceedances were in non-residential or wooded areas and are not expected to cause a condition of pollution.
I Inhalable Fraction (Particles with aerodynamic diameter ≤ 100 μm)
R Respirable Fraction (Particles with aerodynamic diameter ≤ 10 μm)

3rd Tier Screening Review of Additional Standards – Benzene Analysis

A human health risk assessment was completed to demonstrate that benzene emissions do not result in unacceptable impacts to human health. For this analysis, modeled impacts are compared to the Level 1 and Level 2 Acute Exposure Guideline Levels (AEGL-1 and AEGL-2) as an alternative to PAIL screening levels.

AEGL-1 is the airborne concentration of a substance below which it is not expected that the general population, including susceptible individuals, would experience notable discomfort, irritation, or certain asymptomatic, non-sensory effects.

AEGL-2 is the airborne concentration of a substance below which it is not expected that the general population, including susceptible individuals, would experience irreversible or other serious, long lasting adverse health effects or an impaired ability to escape. Ambient air concentrations of benzene used to assess risk were predicted using air dispersion modeling. The latest version of the AERMOD modeling system (AERMOD_22112) was used to estimate maximum ground-level concentrations of benzene for 1-hour, 4-hour, and 8-hour averaging periods. Meteorological data for 2012 through 2016 measured at the Little Rock, AR airport was used in the model.

Averaging Time	Highest Modeled Impact ($\mu g/m^3$)	AEGL-1 Value (µg/m3)	Percent of AEGL-1	AEGL-2 Value (µg/m3)	Percent of AEGL-2
10-minute	265.039142	415308.7935	0.0638%	6389366.053	0.00415%
30-minute	212.7579348	233211.8609	0.0912%	3514151.329	0.00605%
1-hour	185.21654	166123.5174	0.1115%	2555746.421	0.00725%
4-hour	118.555	57504.29448	0.2062%	1277873.211	0.00928%
8-hour	85.47149	28752.14724	0.2973%	638936.6053	0.01338%

Predicted concentrations at the facility property are well below the AEGL-2 thresholds for all averaging periods. The area surrounding the Xpress Boats southern property line is densely forested and some uninhabited area.

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
101 to 108	MSDS and historical records	17 gal/hr and 3382 gal/month (all booths combined)	N/A	N/A	Minimum 200 hrs of operation
109	MSDS and historical records	18.84 gal/hr A, 17.2 gal/hr B Part A, 0.76 lb/gal Part B, 0.26 lb/gal	N/A	N/A	Minimum 200 hrs of operation
111	MSDS and historical records	632 gal/mo, 7656 gal/yr, 3.19 gal/hr, 4.21 lb/gal VOC, Acetone or single HAP	N/A	N/A	Minimum 200 hrs of operation
113	MSDS	PM: 0.000123 lb/inch	Down draft design	75%	3 Plasma Cutting tables, Hours of Operation per table: 8,760 hrs
		NOx: 0.014553 lb/minute <u>Maximum wt% in Aluminum Alloy</u> Cadmium: 0.3 Chromium: 0.5 Cobalt: 0.25 Manganese: 3.0 Nickel: 3.0	N/A	N/A	
114	MSDS	Total VOC: 6.24 lb/hr	N/A	N/A	10,000 gal/yr throughput Capacity: 550 gal
115	SDS, AP-42 1.4 *Natural Gas Combustion*	VOC: 7.76 lb/gal HAP: 7.76 lb/gal PM 0.0075 lb/MMBTU PM10 0.0075 lb/MMBTU CO 0.0824 lb/MMBTU NOx 0.0980 lb/MMBTU VOC 0.0075 lb/MMBTU	N/A	N/A	500 gal/yr, 1.4 MMBTU/hr and 8,760 hrs/yr for dryer

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 (Y/N)
SN-101 through SN-108, SN-109, and SN-111, SN-115	VOC	72.8 tons per rolling 12 month period	Monthly	No
	Single HAP	9.5 tons per rolling 12 month period	Monthly	No
	Total HAP	23.75 tons per rolling 12 month period	Monthly	No
	Acetone	71.5 tons per rolling 12 month period	Monthly	No
	HAP TLV if less than 38 mg/m^3	Must be less than product of TLV and 0.11 in lb/hr	Monthly	No
101 through 108, 115	VOC and HAP	lb/gal Paint: 5.06 Primer: 7.68 Thinner: 7.39 Cleaner: 7.39 Additive: 7.76	Monthly	No
	Acetone	lb/gal	Monthly	No

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		Paint: 0.62 Primer: 0.62 Thinner: 6.60 Cleaner: 6.60 Additive: 0.62		
109	VOC	Resin: 1.02 lb/gal	Monthly	No
111	VOC, HAP, or acetone	Must be less than 4.21 lb/gal	Monthly	No
114	Gasoline Throughput	10,000 gallons per rolling 12 month period	Monthly	No

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
N/A			

20. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

21. 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	AC	HAPs	
								Single	Total
Welding Operations Conducted by Xpress Boats (SN-XB-Weld	A-7								0.06
Welding Operations Conducted by Backtrack Trailers (SN-BT-01)	A-7	Accounted for at SN-XB-Weld							

NG-Fired Heaters for Paint Curing Ovens & Pre-Heat Boxes	A-1	0.07	0.01	0.05	0.79	0.94			0.02
250 gallon Diesel Fuel Tank	A-2			0.1					
5-Gallon Containers	A-8			Negligible					
Foam Component	A-13			1.70			4.87	Negl.	
Solvent Distillation Unit	A-13			0.02			0.02	0.02	0.02
Total									

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 #
2012-AR-3

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Aluma-Weld, Inc.
Xpress Boats
Permit Number: 2012-AR-4
AFIN: 26-00413

			Old Permit	New Permit
$/ton factor	28.14	Permit Predominant Air Contaminant	72.9	73
Minimum Fee $	400	Net Predominant Air Contaminant Increase	0.1	
Minimum Initial Fee $	500			
		Permit Fee $	400	
Check if Administrative Amendment	☐	Annual Chargeable Emissions (tpy)	73	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	6.1	6.2	0.1
PM_{10}	6.1	6.2	0.1
$PM_{2.5}$	0	0	0
SO_2	0	0.1	0.1
VOC	72.9	73	0.1
CO	0	0.5	0.5
NO_X	11.5	12.1	0.6
Total HAPs	24.23	24.25	0.02