

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2016-AR-6 AFIN: 60-00058

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Hall Tank Company, LLC.
2001 East 5th Street
North Little Rock, Arkansas 72114

3. PERMIT WRITER:

Alexander Sudibjo

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Metal Tank (Heavy Gauge) Manufacturing
NAICS Code: 332420

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
1/23/2026	Deminimis	New coating

6. REVIEWER'S NOTES:

Hall Tank Company submitted a de minimis application to allow the use of a new coating at the paint booths (SN-01). The new coating contains lead and mercury. Specific Condition #8 will include exceptions for lead and mercury. The facility's permitted annual emissions are increasing by 1.4 tpy PM/PM₁₀, 1.69E-05 tpy lead, and 2.11E-07 tpy mercury. The facility's total HAPs emissions are decreasing by 0.08 tpy.

7. COMPLIANCE STATUS:

As of January 23, 2026, there are no compliance issues with the facility. ECHO (<https://echo.epa.gov/detailed-facility-report?fid=110007408858>) shows no air violation identified as of March 27, 2024.

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)
Facility	MFHAPs	NESHAP 6X

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: 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:

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/m³), 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?
HDI	0.08411	0.0092521	9.30E-04	Yes
Lead	0.05	0.0055	3.84E-06	Yes
Mercury	0.025	0.0028	4.80E-08	Yes

c) H₂S 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 H₂S Standards Y

If exempt, explain: the facility does not have H₂S emissions.

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	MSDS	Paint = 1.0 Gallons Paint Used per 1,000 Gallons of Tank Painted VOC content: 62.84%	Six (6)-3C412B (30") 3hp Dayton		2 Run Simultaneously

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		PM= (1.0 gal of coating/hr)(11.86 lb of solid/gal of coating)(0.80 overspray)= 6.48 lb/ of solid/hr uncontrolled*(100-90/100)= 0.65 lb/hr Catalyst Reducer Xylene= 0.62% Primer = consists of primer & catalyst 0.25 Gallons Primer Used per 1,000 Gallons of Tank Painted Xylene= 20-30% VOC= 4.8 lb/gal Lead: 4.8E-05 lb/gal Mercury: 6.0E-07 lb/gal	Tubeaxial Fans		Paint= 4:1 ratio with catalyst reducer Throughput = 1 gallon of paint/hr
02	MSDS	Resin = 7.5 Gallons Resin Used per 1,000 Gallons of Tank Painted Catalyst = 1/50 th of Resin =0.15 Gallons of Catalyst Used per 1,000 Gallons of Tank Painted	Four (4)-3C411B (24") 1hp Dayton Tubeaxial Fans		1, 2, or 3 Run Simultaneously
03	AP-42 13.2.6	PM: 0.027 lb/lb of sand used PM ₁₀ : 0.017 lb/lb of sand used Cadmium: 1.8 E-06 lb/lb Chromium: 2.5 E-06 lb/lb Manganese: 1.5 E-06 lb/lb Nickel: 2.0 E-06 lb/lb Lead: 1.8 E-06 lb/lb	Dust Collector	95%	1,000 tons of sand per year 1,200 lb/hr
	San Diego Air Pollution	PM/PM ₁₀ : 7.6 lb/ton steel abrasives	Baghouse	99%	263 tpy of steel abrasives

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	Control District	Cadmium: 3.61E-03 lb/ton Chromium: 3.65E-02 lb/ton Nickel: 3.65E-02 lb/ton Lead: 3.27E-03 lb/ton			60 lb/hr 1.2% Mn content
04	MSDS	Acetone: 6.59 lb/gal	None	N/A	8,000 gallons per year of acetone
05	AP-42	0.005 lb PM / lb wire	None		
07	Engineering Estimate	1.59 lb PM/hr	None		Based on operation of Plasma cutter, 2 band saws, and 1 drill press

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)
01, 02, 03, 04, 05, & 07	MSDS HAP content by species	--	Annual	N
01, 02, & 04	VOC	40.1 tpy	Monthly	N
01, 02, 03, 04, 05, & 07	HAP	10 tpy of any single HAP, 24.6 of all HAPs or any air pollutant with a TLV < 1 mg/m ³ , except for HDI, lead, or mercury	Monthly	N
01, 02	Volume of tank coated	3,489,000 gals of tank painted, each source	Monthly	Y
03	Sand Usage	1,000 tons per consecutive 12 month period	Monthly	N
	Steel Abrasives Usage	263 tons per consecutive 12 month period	Monthly	N
04	Acetone Usage	8,000 gallons	Monthly	N
	Solvent Usage	N/A	Monthly	Y
05	MSDS HAP content for MFHAP for wire used	N/A	Refer to "Site-specific Welding Emissions Manage Plan" which is required by NESHAP 6X	Y

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01 & 02	0%	8 CAR § 40-401	1. Inspector observations for sources not subject to visible emission standards.

SN	Opacity	Justification for limit	Compliance Mechanism
			2. There are no records keeping required.
03	5%	8 CAR § 40-401	1. Inspector observations for sources not subject to visible emission standards. 2. There are no records keeping required.
05 & 07	20%	8 CAR § 41-205 (B)(2) Department Guidance	1. Inspector observations for sources not subject to 6X visible emission standards. 2. Sources subject 6X requirements – daily visible emissions observations

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	VOC	HAPs	
				Single	Total
150 gal Diesel Storage Tank	A-3		2.1E-04		
Sand Loadout	A-13	0.1			
Perlite Filling	A-13	0.2			
Grinding Operations	A-13	0.5			

Permit #: 2016-AR-6

AFIN: 60-00058

Page 8 of 8

Source Name	Group A Category	Emissions (tpy)			
		PM/PM ₁₀	VOC	HAPs	
				Single	Total
330 Gallon Acetone Storage Tank	A-13				0.07

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 #
2016-AR-5

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Hall Tank Company,
 LLC
 Permit Number: 2016-AR-6
 AFIN: 60-00058

			Old Permit	New Permit
\$/ton factor	28.14	Permit Predominant Air Contaminant	40.1	40.1
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	40.1	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	12	13.4	1.4
PM ₁₀	11.5	12.9	1.4
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	40.1	40.1	0
CO	0	0	0
NO _x	0	0	0
Total HAPs	24.6	24.52	-0.08
Acetone	26.4	26.4	0
HDI	1.61E-03	1.61E-03	0
Lead	0	1.69E-05	0.0000169
Mercury	0	2.11E-07	2.11E-07