STATEMENT OF BASIS

For the issuance of Air Permit # 1145-AR-12 AFIN: 60-00049

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

CT GS Building Products, Inc. 2701 East Roosevelt Road Little Rock, Arkansas 72206

3. PERMIT WRITER:

Skylar Redman

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Asphalt Shingle and Coating Materials Manufacturing

NAICS Code: 324122

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application	Short Description of Any Changes
	(New, Renewal, Modification,	That Would Be Considered New or
	Deminimis/Minor Mod, or	Modified Emissions
	Administrative Amendment)	
8/14/2023	Modification	Addition of an office emergency
		generator (SN-919) and combustion
		HAPs for SN-122, and SN-129.
		Removal of SN-183

6. REVIEWER'S NOTES:

GS Roofing Products Company (GS Roofing), currently owned by CertainTeed Corporation, operates an asphalt roofing manufacturing facility in Little Rock, Arkansas (Pulaski County). GS Roofing requested a modification to add an office emergency generator (SN-919) and combustion HAPs for SN-122, SN-129, and SN-183. Emissions decrease as follows: 0.1 tpy of PM/PM $_{10}$, 0.1 tpy of SO $_{2}$, 0.1 tpy of VOC, 0.1 tpy of CO, 0.6 tpy of NO $_{x}$, and 0.01 tpy of Formaldehyde, and 0.01 tpy of total HAPs.

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7. COMPLIANCE STATUS:

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

The facility was last inspected on July 10, 2023 and no violations were identified.

https://echo.epa.gov/detailed-facility-report?fid=110002373841&ej_type=sup&ej_compare=US

8. PSD/GHG APPLICABILITY:

- a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
- 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, explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)	
Asphalt Storage Tanks (SN-120, SN-144, SN-145, SN-206, SN207 & SN-917), Mineral Handling & Storage Equipment (SN-148, SN-149, SN-151, SN-152, SN-153, SN-154, SN-165, SN-166, & SN-167), Pre-coaters & Coaters (SN-102, SN-103, SN-131, & SN-132)	PM/PM ₁₀	40 CFR Part 60 (NSPS) Subpart UU – Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture	
SN-102, 103, 131, and 132	PAH/PM	40 CFR 63 (NESHAP) Subpart AAAAAAA (7A) – National Emission Standards For Hazardous Air Pollutants For Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing	
SN-919	HAPs	40 CFR 60 Subpart JJJJ 40 CFR 63 Subpart ZZZZ	

10. EMISSION CHANGES AND FEE CALCULATION:

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See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

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 ADEQ Air Permit Screening Modeling Instructions

b) Non-Criteria Pollutants:

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLV) that pass the PAER or PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

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/m³)	$PAER (lb/hr) = 0.11 \times TLV$	Proposed lb/hr	Pass?
Formaldehyde	0.01342	0.0014762	2.06	No
Carbonyl Sulfide ¹	24.57	2.703	0.94	Yes
Glycol Ethers ²	95	10.45	0.5	Yes
Polycyclic Organic Matter (POM) ³	0.2	0.022	0.02	Yes
Toluene	188	20.68	0.31	Yes
Ammonia	17.4	1.92	0.4	Yes

- 1. The TLV for Carbonyl Sulfide was not reported in the ACGIH. Based on H₂S.
- 2. The TLV for Glycol Sulfide was not reported in the ACGIH. Used EPA website info.
- 3. The TLV for POM is based on the TLV for Phenanthrene.

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

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compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL (μg/m³) = 1/100 of Threshold Limit Value	Modeled Concentration (μg/m³)	Pass?
Formaldehyde*	0.0001342	32.32572	No

^{*} Modeling results from Permit #1145-AR-12

Formaldehyde Risk Assessment

AERMOD air dispersion modeling of 24-hr maximum air concentration shows the area exceeding the $0.0001342~\mu g/m^3$ PAIL limit for Formaldehyde. No residential areas are affected. As such, there is confidence in the conclusion that no adverse effects are expected from formaldehyde emission attributable to the operation of the facility.

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 H ₂ S Standards	Y/N
If exempt, explain:	

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
	20 parts per million (5-minute average*)		
	80 parts per billion		
H ₂ S	(8-hour average)		
_	residential area		
	100 parts per billion		
	(8-hour average)		
	nonresidential area		

^{*}To determine the 5-minute average use the following equation

$$Cp = Cm \; (t_{\text{m}}\!/t_{\text{p}})^{0.2} \; \; \text{where} \; \;$$

Cp = 5-minute average concentration

Cm = 1-hour average concentration

 $t_m = 60 \text{ minutes}$

 $t_p = 5 \text{ minutes}$

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12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lbs/ton.)		Control Equipment	Control Equipment Efficiency	Comments
102,103,104, 105	Asphalt Roofing Manufacturer=s Association (ARMA)	VOC CO Formaldehyde Carbonyl Sulfide	0.359 0.0754 0.00915 0.00808			(Emission factor are based on pound of pollutant per ton of asphalt processed)*
102,103,131, 132	NSPS Subpart UU	PM	0.08 lb/ton of roll roofing produced			
104	AP-42 §13.2.4	PM	0.00032			Aggregate Handling & Storage
105,137	ARMA	PM	0.85			*
113,114,116, 116,117,118,120,131,133, 134,135,136, 137,144,145, 156,159,164, 205, 207	VOC emission factor based on stack test data	VOC	0.17			VOC emission factor based on July 2007 stack test data as measured by EPA Test Method 25A
132	stack test data	VOC	0.13			July 2007 stack test data
113,116,117, 118,120,131, 133,134,135, 136,137,144, 156,159,207	ARMA	СО	0.0754			*
113,164,205	ARMA	СО	0.0202			*
114,145	ARMA	СО	0.019			*
113	ARMA	Formaldehyde Carbonyl Sulfide	0.0252 0.0046			*
114,115	ARMA	Formaldehyde Carbonyl Sulfide	0.00397 0.00025			*
1						· ·

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SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lbs/ton.)		Control Equipment	Control Equipment Efficiency	Comments	
116,117,118,120,144,156, 159,206,207	ARMA	Formaldehyde Carbonyl Sulfide	0.00		_	_	*
164, 205	ARMA	Formaldehyde Carbonyl Sulfide	0.02 0.00				*
131 thru 137	ARMA	Formaldehyde Carbonyl Sulfide	0.008				*
113		PM		-			Emissions from 113 are routed to SN-903 (Baghouse)
114,145,205	ARMA	PM	PM 0.5000				
116,117,118, 120,144,159, 206,207	ARMA	PM	0.10)5			
164	ARMA	PM		-			Emissions from 164 are routed to SN-912 (Baghouse)
133,134,135,136	ARMA	PM	0.00032				Surfacing PM/PM10 -All PM/PM10 is composed of organic compounds. Therefore, the total VOC emissions are the sum of THC (as carbon) and the emitted PM/PM10.
129,183,122, 115,119,121, 143,158,157, 160,139,180	AP-42 §1.4(NG) and AP-42 1.5(Propane)		MMBtu/h				These Sources may use propane as a backup fuel
	, .	СО	NG 1	Propane			
		<u>. </u>					

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SN	Emission Factor Source (AP-42, testing, etc.)		Emission Factor (lbs/ton.)		Control Equipment	Control Equipment Efficiency	Comments
		NOx PM/PM10 SO2 VOC	0.0824 0.098 0.0075 0.0006 0.0054	0.0210 0.155 0.0044 0.0166 0.0055			
SN-183	AP-42 Table 1.4-1 and 1.4-2 Natural gas combustion	CO NOx PM/PM10 SO2 VOC		AP-42 /e row)			Capacity = 3.7MMBtu/hr With 10% safety factor, 3.7 x 1.1 = 4.1
SN-106, SN-140, SN-178	Mass Balance					Paint, part washer usage. Max VOC content lb/gal.	
131,132,102, 103	ARMA	PM/PM10 THC(as C) CO Toluene Formaldehyde Carbon Sulfide Phenol	0.3 7.54 6.18 9.15 8.08 2.52	850 359 4E-02 8E-03 5E-03 8E-03 2E-04 Asphalt)			Emission for SN 131 & 132 are routed to SN- 907; Emission from SN-102 routed to SN-912 and emission from SN-103 routed to SN-902
SN-175	Tank Program			-			
SN-902	ARMA	PM/PM10		Subpart JU			Must meet NSPS UU PM limit 0.08 lb/ton
SN-903	Publication from EPA's Clean Air Technology Center (CATC)	PM/PM ₁₀ , also captures VOC: the Emission rate is the sum of grain loading PM contribution	0.02 ((gr/ft3)			Baghouse exit flow rate: 5400 cubic feet per minute (cfm). (Vents SN- 109,110,111,112, and 113)

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SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lbs/ton.)		Control Equipment	Control Equipment Efficiency	Comments
		plus 10% any THC				
SN-904		PM/PM ₁₀	0.02 gr/ft3			Baghouse exit flow rate: 1000 cfm
SN-905	CATC	PM/PM ₁₀	0.02 gr/ft3			Baghouse exit flow rate: 900 cfm
SN-906	CATC	PM/PM ₁₀ , also captures VOC: the Emission rate is the sum of grain loading PM contribution plus 10% any THC	0.02 (gr/ft3)			Baghouse exit flow rate: 12,800 cfm. Vents SN-125, 127, 128.
SN-907	NSPS Subpart UU	PM/PM ₁₀	0.02 (gr/ft3)			Must meet NSPS UU PM limit 0.08 lb/ton
SN-908	CATC	PM/PM ₁₀	0.02 (gr/ft3)			Baghouse exit flow rate: 1000 cfm, passive.
SN-909	CATC	PM/PM ₁₀	0.02 (gr/ft3)			Baghouse exit flow rate: 900 cfm, passive
SN-910	CATC	PM/PM ₁₀	0.02 (gr/ft3)			Baghouse exit flow rate: 1800cfm
SN-911	CATC	PM/PM ₁₀	0.02 (gr/ft3)			Baghouse exit flow rate: 1000 cfm
SN-912	CATC	PM/PM ₁₀ , also captures VOC: the Emission rate is the sum of grain loading	0.02 (gr/ft3)			Baghouse exit flow rate: 4500 cfm. Vents SN- 164

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SN	Emission Factor Source (AP-42, testing, etc.)		ion Factor s/ton.)		Control Equipment	Control Equipment Efficiency	Comments
		PM contribution plus 10% any THC					
SN-913	CATC	PM/PM ₁₀	0.02 (g	gr/ft3)			Baghouse exit flow rate: 1050 cfm.
SN-914	CATC	PM/PM ₁₀	0.02 (g	gr/ft3)			Baghouse exit flow rate: 3,000 cfm
SN-915	CATC	PM/PM ₁₀ , also captures VOC: the Emission rate is the sum of grain loading PM contribution plus 10% any THC	0.02 (gr/ft3)				Baghouse exit flow rate: 433 cfm passive. Must meet NSPS UU PM limit 0.08 lb/ton
SN-916		PM/PM ₁₀	0.02 (g	gr/ft3)			Baghouse exit flow rate: 1500 cfm
SN-182	Mass Balance		1				
SN-183	AP-42 Table 1.4-1 and 1.4-2 Natural gas combustion		See AP-42				Capacity = 3.7MMBtu/hr With 10% safety factor, 3.7 x 1.1 = 4.1
SN-919	AP-42 3.2-3 Table (7/00)	$PM = PM_{10} =$	$\begin{array}{c} \frac{lb/MMBtu}{PM = 0.00993} \\ PM_{10} = 0.0000771 \\ SO_2 = 0.000588 \\ Formaldehyde = 0.0528 \\ VOC = 0.118 \\ CO = 0.557 \\ NO_X = 4.08 \\ \end{array}$		Uncontrolled	N/A	Generac 30 kW natural gas 0.502 MMBtu/hr Emergency 500 hr/yr
SN-918	stack test data	, 	0.1	17			

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SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lbs/ton.)		Control Equipment	Control Equipment Efficiency	Comments
	ARMA – pound of	VOC	0.105	Ceco Filter	90%	
	pollutant per ton of asphalt	PM/PM ₁₀	0.0754			.
1	processed	CO	0.00568			Emissions from SN-917 are
1		Formaldehyde - Carbonyl	0.0049			routed to SN-918
		Sulfide POM	0.0000986			

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
SN-131 and SN- 132 (Outlet of SN-907)	PM/PM ₁₀	5A, 22, 9	per 40 CFR §60.8	To demonstrate compliance with the permitted emission limits.
SN-145 (Outlet of SN- 907)	PM/PM ₁₀	9	Testing per 40 CFR §60.8	To demonstrate compliance with the permitted emission limits. Please see Specific Condition 26 for details.
SN-120 (Outlet of SN- 902)	PM/PM ₁₀	9	Testing per 40 CFR §60.8	To demonstrate compliance with the permitted emission limits. Please see Specific Condition 26 for details.
SN-148	PM/PM ₁₀	9	Testing per 40 CFR §60.8	To demonstrate compliance with

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SN	Pollutants	Test Method	Test Interval	Justification
(Outlet of SN- 908)				the permitted emission limits. Please see Specific Condition 26 for details.
SN-149 (Outlet of SN- 909)	PM/PM ₁₀	9	Testing per 40 CFR §60.8	To demonstrate compliance with the permitted emission limits. Please see Specific Condition 26 for details.
SN-151, SN- 152, and SN-153 (Outlet of SN- 910)	PM/PM ₁₀	9	Testing per 40 CFR §60.8	To demonstrate compliance with the permitted emission limits. Please see Specific Condition 26 for details.
SN-154 (Outlet of SN- 911)	PM/PM ₁₀	9	Testing per 40 CFR §60.8	To demonstrate compliance with the permitted emission limits. Please see Specific Condition 26 for details.
SN-165, SN- 166, SN-167 (Outlet of SN- 913)	PM/PM ₁₀	9	Testing per 40 CFR §60.8	To demonstrate compliance with the permitted emission limits. Please see Specific Condition 26 for details.
SN-102 and SN- 103 (Outlet of SN-915 and 902)	PM/PM ₁₀	5A, 22, 9	Testing per 40 CFR §60.8	To demonstrate compliance with the permitted emission limits.

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SN	Pollutants	Test Method	Test Interval	Justification
SN-917 (Outlet of SN- 918)	PM/PM ₁₀	9	Testing per 40 CFR §60.8	To demonstrate compliance with the permitted emission limits. Please see Specific Condition 26 for details.

14. 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)
907, 902, and 915	Inlet temperature reading	Thermocouple	Continuously	N
902 and 915	Pressure Drop Across Unit	Pressure Gauge	Weekly	N

15. 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)
Plantwide	Asphalt usage	96,850 tpy	Monthly	N
Plantwide	Roofing Material Production	205,000 tpy Monthly		N
Plantwide	VOC emissions	95.5 ton	Monthly	N
182	Coating VOC and ammonia limits	0.5 lb/gallon	Monthly	N
178	Part Washer Solvent VOC limit	8.0 lb/gallon	Monthly	N
106 and 140	HAPs usage	5.0 tons	Monthly	N

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SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)	
	VOC limit	See Specific Condition # 5			
106 and 140	Paint	2 lb/gallon	Monthly	N	
919	Total Operating Hours	Maximum 500 hrs/yr each total (emergency and non- emergency)/rolling 12 months	Monthly	No	
919	Emergency Situation	May continue operating during emergency, must document any exceedance over 100 hrs/yr	As occurs	No	
919	Compliance with NESHAP Subpart JJJJ Compliance with NESHAP Subpart ZZZZ	Applicable emission & operating limitations, no later than October 19, 2013	Monthly	No	
919	Non-emergency operation: maintenance checks and readiness testing	Any operation other than emergency operation, for 50 hours per year, which count towards the 100 hours/calendar year maintenance and testing	As occurs	No	
919	Subpart ZZZZ of Part 63 – monitoring results, maintenance log	Operating limitations and other requirements apply at all times.	As occurs – Report any deviation	Yes	
919	Manufacturer's written Instructions	Follow manufacturer's maintenance instructions & NESHAP Subpart JJJJ and NESHAP Subpart ZZZZ or develop and follow	Keep on-site	No	

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own maintenance plan a. Change oil and filter every 500 hours of op or annually, whichever		
occurs first. The permittee has the option to utilize an oil analysis program as described in §63.6625(j) in order to extend the specified oil change requirement in Table 2C of Subpart ZZZZ of Part 63, items #6, footnote 2; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; c. Inspect all hoses and belts every 500 hours of operation, or annually, whichever	As stated	No

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
SN-122	20	19.503	Testing per 40 CFR §60.8
104, 105, 106, 118, 126, 133, 134, 135, 136, 137, 140, 146, 147, 150, 156, 159, 178, 179, 182, 183,	5	18.501	Testing per 40 CFR §60.8

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SN	Opacity	Justification for limit	Compliance Mechanism
903, 904, 905, 906, and 912.			
SN-902 when SN- 103 is operating.	20	19.503	Testing per 40 CFR §60.8
SN-902 when SN- 103 is not operating and SN-120 is operating	0	60.472(c)	Testing per 40 CFR §60.8
SN-915 when SN- 102, 207, and 206 are operating.	20	19.503	Testing per 40 CFR §60.8
SN-915 when 102 is not operating, and 207, 206 are operating.	0	60.472(c)	Testing per 40 CFR §60.8
SN-907 when SN- 131 and SN-132 are operating.	20	60.472(a)(2)	Testing per 40 CFR §60.8
SN-907 when SN- 131 and SN-132 are not operating and SN-145 is operating.	0	60.472(c)	Testing per 40 CFR §60.8
SN-144	0	40 CFR Part 60.472(c)	Testing per 40 CFR §60.8
SN-908, 909, 910, 911,913, and 916.	1	40 CFR Part 60.472(d)	Testing per 40 CFR §60.8
SN-918	0	40 CFR Part 60.472(c)	Testing per 40 CFR §60.8
SN-919	5	§18.501 & A.C.A.	Natural gas as fuel

17. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

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18. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source	Group A			Emissio	ons (tpy)			
Name	Category	PM/PM ₁₀	SO_2	VOC	СО	NO _x	HA	
Roofing Line Shrink Wrap	A-13		2				Single	Total
Coating Asphalt Heater, 3.5 MM Btu/hr	A-1							
Roofing Line SBS Modified Asphalt Storage Tank Heater, 0.8 MM Btu/hr	A-1							
Roofing Line SBS Storage Tank and Heater, 2.5 MM Btu/hr	A-1							
Modified Line Backing Film Applicator	A-13							
Modified Line Sheet Edge Flame Shrinking,	A-1							

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Source	Group A			Emissi	ons (tpy)			
Name	Category	DM/DM	0.0	VOC	CO	NO	НА	Ps
1 (6212	out goly	PM/PM ₁₀	SO_2	VOC	СО	NO _x	Single	Total
0.03 MM Btu/hr								
Modified Line Shrink Wrap	A-13							
Modified Line Pre- Coater Storage Tank Heater, 0.8 MM Btu/hr	A-1							
Modified Line APP Polymer Storage Tank	A-3							
Modified Line SBS Flux Storage Tank Electric Heater	A-13							
Modified Line Hot Oil Heater, 6.0 MM Btu/hr	A-1							
Modified Line APP Flux Storage Tank Heater, 0.8 MM Btu/hr	A-1							

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Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO_2	VOC	СО	NO _x	HAPs	
							Single	Total
Modified	B-21							
Line								
Tectifier								
Resin								
Storage								
Tank								
1,500	A-3							
gallon								
Diesel								
Tank								
Kerosene	A-3							
Storage								
Tank								
Modified	A-1							
Line								
Sheet								
Splicing,								
0.06 MM								
Btu/hr								

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

	Permit #		
1145-AR-11			



Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: CT GS Building

Products, Inc.

Permit Number: 1145-AR-12

AFIN: 60-00049

			Old Permit	New Permit
\$/ton factor	28.14	Permit Predominant Air Contaminant	95.8	95.9
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)	95.9	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	85.2	85.3	0.1
PM_{10}	85.2	85.3	0.1
PM _{2.5}	0	0	0
SO_2	1.3	1.4	0.1
VOC	95.8	95.9	0.1
CO	27	27.1	0.1
NO_X	11.4	12	0.6
Ammonia	1.4	1.4	0
Formaldehyde	3.53	9.12	5.59
Carbonyl Sulfide	1.84	1.84	0
POM	0.02	0.02	0
HAPs	3	3.01	0.01
Toluene	0.55	0.55	0
Fluorine	0	0	0