

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1290-AR-3 AFIN: 04-00313

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Hendren Plastics, Inc.
1607 Highway 72 SE
Gravette, Arkansas 72736

3. PERMIT WRITER:

Bart Patton

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Unlaminated Plastics Film and Sheet (except Packaging)
Manufacturing
NAICS Code: 326113

5. SUBMITTALS:

1/25/2010

6. REVIEWER'S NOTES:

Hendren Plastics, Inc., located in Gravette, AR, operates a polystyrene foam molding plant. This permitting action is to allow the facility to increase block molding capacity within previous emissions limits and to add a gas-fired boiler to the insignificant activities list. With this modification the permitted VOC emissions will remain unchanged.

The facility's NAICS Code has changed since the previous revision of this permit. It was previously 326140, "Polystyrene Foam Product Manufacturing."

7. COMPLIANCE STATUS:

The facility is currently under no enforcement action.

8. PSD 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 not PSD?

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
NONE		

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. MODELING:

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.

Non-Criteria Pollutants:

No non-criteria pollutants have been identified for this facility.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	VOC Material Balance	6% Pentane Loss	-	-	Assumes all pentane is released from material during expansion, molding, storage, and fabrication.

The facility has provided an explanation of sub-process/equipment capacities within the SN-01 bubble. These sub-process capacities are not a condition of the permit, but they illustrate how the addition of the second EPS molding machine should not cause the facility to exceed their permitted limits. From page 16 of the facility’s permit application, dated January 14, 2010, with emphasis in the original:

EPS pentane is estimated to be released by the equipment according to the following percentages. **For purposes of rate calculations, 6% was used rather than 5.1% (average).** Six percent is the **maximum level** of resins processed.

Expanding -	25%	1.500% Volume (.25*.060)
Molding -	15%	0.900% Volume (.15*.060)
Cutting -	20%	1.200% Volume (.20*.060)
Pre-Puff Curing -	20%	1.200% Volume (.20*.060)
Block Curing -	20%	1.200% Volume (.20*.060)

Equipment Capacities (Limits)

Expanding -	500#/hr	7.500#/hr
Molding -	500#/hr	7.500#/hr
Cutting -	500#/hr	7.500#/hr
Pre-Puff Curing -	500#/hr	7.500#/hr
Block Curing -	500#/hr	7.500#/hr
Total Limits		21.900#/hr
Additional Molding	300#/hr	2.700#/hr
		24.600#/hr

The process limit of 25.0 lb/hr VOC is unchanged.

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
NONE				

14. MONITORING OR CEMS

There are no monitoring or CEMS requirements.

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)
Facility	VOC	74.9 tons/year	Monthly	N
Facility	Expandable Polystyrene Resins	6% Pentane Loss	Monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
NONE			

17. DELETED CONDITIONS:

Former SC	Justification for removal
NONE	

18. GROUP A INSIGNIFICANT ACTIVITIES

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
NONE								

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19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1290-AR-2

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.



Paula Parker, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 07-27-09

Facility Name:
 Permit Number:
 AFIN:

			Old Permit	New Permit
\$/ton factor	22.07	Permit Predominant Air Contaminant	74.9	74.9
Minimum Fee \$	400	Net Chargeable Emission Increase	0	
Minimum Initial Fee \$	500	Permit Modification Fee \$	0	
		Initial Permit Fee \$	0	
Check if Administrative Amendment	<input checked="" type="checkbox"/>	Annual Chargeable Emissions (tpy)	74.9	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0	0	0
PM ₁₀	0	0	0
SO ₂	0	0	0
VOC	74.9	74.9	0
CO	0	0	0
NO _x	0	0	0