

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2132-AOP-R0 AFIN: 22-00057

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality  
8001 National Drive  
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Drew Foam Companies, Inc.  
1093 Highway 278 East  
Monticello, Arkansas 71655

3. PERMIT WRITER:

Wesley Crouch

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Polystyrene Foam Product Manufacturing  
NAICS Code: 326140

5. SUBMITTALS:

January 12, 2007

6. REVIEWER'S NOTES:

Drew Foam Companies, Inc., has purchased a manufacturing facility located at 1093, Highway 278 East and plans to install new production equipment. Drew will install and operate a new expander, molder, backup boiler, drying oven, and hot melt glue lamination process. This modification will allow the facility to comply with a plantwide VOC limit through mass balance and recordkeeping. The maximum allowable pentane content in the beads has been raised to 6.8%. The permitted emission rates are 0.9 tpy PM/PM<sub>10</sub>, 0.3 tpy SO<sub>2</sub>, 245.35 tpy VOC, 7.0 tpy CO and 8.1 tpy NO<sub>x</sub>.

Drew foam currently operates a facility in Monticello, but will be moving operations to this location. The current facility (AFIN: 22-00046) operates under permit 1292-AOP-R2.

7. COMPLIANCE STATUS:

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

No compliance issues at this time.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

Has the facility undergone PSD review in the past? N

Is the facility categorized as a major source for PSD? N

    ≥ 100 tpy and on the list of 28? N

    ≥ 250 tpy all other? N

PSD Netting

Was netting performed to avoid PSD review in this permit? N

Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
10 & 11	all	NSPS 40 CFR Part 60, Subpart Dc

9. EMISSION CHANGES:

The following table summarizes plantwide emission changes associated with this permitting action.

Plantwide Permitted Emissions (tpy)			
Pollutant	Permit # N/A	Permit #2132-AOP-R0	Change
PM		0.9	0.9
PM <sub>10</sub>		0.9	0.9
SO <sub>2</sub>		0.3	0.3
VOC		245.35	245.35
CO		7.0	7.0
NO <sub>x</sub>		8.1	8.1

10. 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 emitted at this facility.

11. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01 03 05 06 07 14	Testing	Pentane Loss SN-01 – 0.13% SN-03 – 3% SN-05 – 4% SN-06 – 1% SN-07 – 1% SN-14 – 1.0	none		
10 11 12	AP-42	PM: 7.6 lb/MM scf SO <sub>2</sub> : 0.6 lb/MM scf NO <sub>x</sub> : 100 lb/MM scf CO: 80 lb/MM scf VOC: 11 lb/MM scf	none		

12. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
No testing required				

13. 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)
No monitoring required				

14. RECORD KEEPING 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	Pentane content VOC emissions	6.8% 245.35 tpy	monthly	Y
10,11	Fuel combusted	N/A	monthly	Y

15. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
10,11,12	5%	Dept. Guidance	Natural gas as fuel

16. DELETED CONDITIONS:

Former SC	Justification for removal
	Initial permit, all new conditions

17. VOIDED, SUPERCEDED, OR SUBSUMED PERMITS:

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

Permit #
N/A

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

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Tom Rheume, P.E.