

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2132-AOP-R1 AFIN: 22-00057

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

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

3. PERMIT WRITER:

Siew Low

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Polystyrene Foam Product Manufacturing
NAICS Code: 326140

5. SUBMITTALS:

11/3/2009

6. REVIEWER'S NOTES:

Drew Foam Companies, Inc., has purchased a manufacturing facility located at 1093, Highway 278 East, Monticello, Arkansas. This modification will allow the facility to revise a plantwide VOC limit, to revise emission rates of the adhesive operation, and to include two generators (SN-15 and SN-16). The Natural Gas Boiler (SN-11) and the Base Coat Drying Chamber (SN-12) have been removed from service. Permitted emission increases include 3.15 tpy of VOC, 0.8 tpy of acetone, and 7.4 tpy of hexane; permitted emission decreases include 0.3 tpy pf PM/PM₁₀, 2.6 tpy of CO and 3.1 tpy of NO_x.

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 was performed on July 8, 2009. The facility was not in compliance. The facility was found deviated from General Provisions #21: Annual Compliance Certification reports are incomplete, due to not identifying each term or condition of the permit; and General Provisions #23: Items not addressed in permit, which includes the higher than permitted VOC content, unpermitted non-criteria air pollutant in the adhesive of basecoat operation; and the 39" x 49" x 195" mold that is not currently permitted.

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)
SN-10	-	NSPS Subpart Dc

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:

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?
Acetone	1187	130.5	1.2	Yes
Hexane	176.2	19.3	1.69	Yes

12. 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, 02, 04	Mass Balance	-	-	-	-
13	Mass Balance	-	-	-	-
10	AP-42	1.4 - Natural Gas Combustion	-	-	-
15 and 16	AP-42	3.2 - Natural Gas-fired Reciprocating Engines	-	-	4 stroke rich burn

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
No testing required				

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)
No monitoring required				

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)
01, 02, 03, 04, 05, 06, 07, 13, and 14,	VOC content VOC tpy	6.8 wt. % 248.0	monthly	Y
10	Fuel Combusted	-	monthly	Y
15 and 16	Operating hours	500 hours each	monthly	N
13	VOC Acetone Hexane	90 wt.% 5 wt.% 40 wt.%	monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
10	5%	Department Guidance	Natural Gas As Fuel
15 and 16	5%	Department Guidance	Natural Gas As Fuel

17. DELETED CONDITIONS:

Former SC	Justification for removal
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18. GROUP A INSIGNIFICANT ACTIVITIES

The following Insignificant activity is the only new IA proposed in this permitting action.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Dust Collection Cyclone and cyclone dust bagging system	A13	1.6						

Permit #: 2132-AOP-R1

AFIN: 22-00057

Page 5 of 5


19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2132-AOP-R0

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.



Karen Cerney, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

