

STATEMENT OF BASIS

For the issuance of Air Permit # 2132-AOP-R9 AFIN: 22-00057

1. PERMITTING AUTHORITY:

Division 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:

Alexander Sudibjo

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Polystyrene Foam Product Manufacturing
NAICS Code: 326140

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
3/12/2025	Administrative Amendment	N/A

6. REVIEWER'S NOTES:

With this administrative amendment, the facility is adding language to clarify the VOC calculations methodology in Plantwide Condition #10 and updating the insignificant activity list. There are no changes to the facility's permitted annual emissions.

7. COMPLIANCE STATUS:

As of March 12, 2025, there are no compliance issues with the facility. ECHO (<https://echo.epa.gov/detailed-facility-report?fid=110001149221>) shows no air violations identified as of April 20, 2023.

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)
SN-10	-	NSPS Subpart Dc
SN-15 and SN-16	-	NESHAP Subpart ZZZZ

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:

Did the facility request a permit shield in this application? N

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Rule 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit?

If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
N/A		

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source

level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
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:

Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

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	Mass Balance	24% of pentane emitted	-	-	5,619 lb/hr beads

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
02, 02A, 03	1999 BASF Bulletin “Environmental Pentane Emissions During Processing”	27% of pentane emitted	-	-	8% pentane by weight <u>Pentane loss rate</u>
04		12% of pentane emitted	-	-	Block mold: 61%
05, 06, 07, 14		33% of pentane emitted	-	-	Shape mold: 96%
10	AP-42 1.4 - Natural Gas Combustion	lb/MMscf PM/PM ₁₀ : 7.6 SO ₂ : 0.6 VOC: 5.5 CO: 84 NO _x : 100 Total HAP: 1.88	-	-	21.0 MMBtu/hr
15 and 16	AP-42 3.2 - Natural Gas-fired Reciprocating Engines	lb/MMBtu PM/PM ₁₀ : 0.0195 SO ₂ : 0.000588 VOC: 0.0296 CO: 3.72 NO _x : 2.21 Total HAP: 0.137	-	-	4 stroke rich burn

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, 06, 07, 13, and 14	VOC tpy	248.0	Monthly	Y
01, 02, 03, 04, 05, 06, 07, and 14,	VOC content	8 wt. %	Monthly	Y
10	Fuel Combusted	-	Monthly	Y
15 and 16	Operating hours	500 hours per calendar year each	Monthly	Y
15 and 16	Maintenance plan	Specific Conditions #15 and #16	Annually	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
10	5%	Department Guidance	Inspector Observation
15 and 16	5%	Department Guidance	Inspector Observation

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	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Cooling Tower	A-13	9.0E-05						
Three (3) Scrap Densification Units	A-13	9.0E-07						

Permit #: 2132-AOP-R9

AFIN: 22-00057

Page 6 of 6

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 #
2132-AOP-R8

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Drew Foam Companies, Inc.

Permit Number: 2132-AOP-R9

AFIN: 22-00057

\$/ton factor	28.14	Annual Chargeable Emissions (tpy)	259.6
Permit Type	AA	Permit Fee \$	0

Minor Modification Fee \$ 500

Minimum Modification Fee \$ 1000

Renewal with Minor Modification \$ 500

Check if Facility Holds an Active Minor Source or Minor Source General Permit ☐

If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$ 0

Total Permit Fee Chargeable Emissions (tpy) 0

Initial Title V Permit Fee Chargeable Emissions (tpy)

HAPs not included in VOC or PM:

Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants:

All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		0.9	0.9	0		
PM ₁₀		0.9	0.9	0	0	0.9
PM _{2.5}		0	0	0		
SO ₂		0.3	0.3	0	0	0.3
VOC		248.8	248.8	0	0	248.8
CO		8.3	8.3	0		
NO _x		9.6	9.6	0	0	9.6
Total HAPs	<input type="checkbox"/>	0.2	0.2	0		