

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2194-A AFIN: 60-04308

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Cone Solvents, Inc.
1814 Central Airport Road
North Little Rock, Arkansas 72117

3. PERMIT WRITER:

Parviz Mokhtari

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description:

NAICS Facility Description: Other chemical and Allied Products Merchant Wholesalers

NAICS Code:

424690

5. SUBMITTALS:

10/27/2008

6. REVIEWER'S NOTES:

Cone Solvents, Inc. (AFIN: 60-04308) is a whole sale chemical distribution company. The facility is located on 1814 Central Airport Road, North Little Rock, Arkansas. This will be the first air permit issued to this facility. The overall annual permitted emissions will be 2.0 tpy VOC and 0.34 tpy Methyl Alcohol.

7. COMPLIANCE STATUS:

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

This is the initial permit for this facility.

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-02 and SN-03	N/A	Subpart Kb (Tank Dimensions & True Vapor Pressure of product)

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. MODELING:

Criteria Pollutants: N/A

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/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Methyl Alcohol	262.1	28.8	8.28	Yes

Other Modeling:

H₂S Modeling: N/A

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01 and 04	Tanks 4.09	Tanks 4.09	None	None	N/A

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

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)
N/A				

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	Type product Throughput	Acetone 250000 gal/yr	monthly	N
02	Type product Throughput	Methyl Alcohol 250000 gal/yr Tank Dimension	monthly	N
01	Type product Throughput	Mineral Spirit 250000 gal/yr Tank Dimension	monthly	N
01	Type product Throughput	300-360 Mineral Spirit 250000 gal/yr	monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
N/A			

17. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

18. GROUP A INSIGNIFICANT ACTIVITIES

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
N/A								

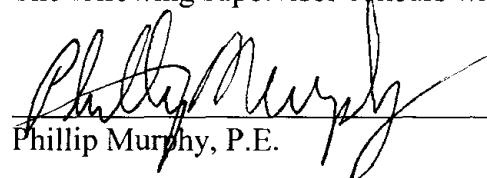
19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
N/A

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.


 Phillip Murphy, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Facility Name: Cone Solvent, Inc.

Permit Number: 2194-A

AFIN: 60-04308

\$/ton factor 22.07
 Minimum Fee \$ 400
 Minimum Initial Fee \$ 500

Check if Administrative Amendment ☐

Permit Predominant Air Contaminant
 Net Chargeable Emission Increase
 Permit Modification Fee \$
 Initial Permit Fee \$
 Annual TPY Chargeable Emissions

Old Permit	New Permit
0	2
0	
0	
500	
2	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0	0	0
PM ₁₀	0	0	0
SO ₂	0	0	0
VOC	0	2	2
CO	0	0	0
NO _x	0	0	0
Methy Alcohol	0	0.34	0.34
	0	0	0

