

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2448-A AFIN: 60-06113

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Creative Foam Products, LLC.  
1301 E. Eighth Street  
North Little Rock, Arkansas 72114

3. PERMIT WRITER:

Elliott Marshall

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
1/25/2022	New	This permit allows Creative Foam Products to construct and operate a new EPS block molding facility. All sources will be new.

6. REVIEWER'S NOTES:

Creative Foam Products submitted an application for an initial minor source permit. Permitted emissions are 0.4 tpy PM/PM<sub>10</sub>, 0.1 tpy SO<sub>2</sub>, 95.3 tpy VOC, 3.8 tpy CO, 4.5 tpy NO<sub>x</sub> and 0.09 tpy Total HAPs.

## 7. COMPLIANCE STATUS:

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

There are no active or pending enforcement actions.

## 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? N

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

- *Single pollutant  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  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)
02	-	NSPS Dc

## 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 Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N  
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) H<sub>2</sub>S 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 H<sub>2</sub>S Standards

Y

If exempt, explain: This facility has no H<sub>2</sub>S 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 1999 BASF Bulletin “Environmental Pentane Emissions During Processing”	Pre-expansion: 13% of pentane emitted	-	-	4,000 lb/hr beads 8% pentane by weight
		Pre-puff aging: 27% of pentane emitted	-	-	
		Block Molding: 16% of pentane emitted	-	-	
		Block Storage: 9.7% of pentane emitted	-	-	
02	AP-42 Table 1.4-1 & 2 Table 1.4-3 & 4	<u>lb/MMscf</u> PM/PM <sub>10</sub> : 7.6 SO <sub>2</sub> : 0.6 VOC: 5.5 CO: 84.0 NO <sub>x</sub> : 100.0	-	-	10.461 MMBtu/hr 8,760 hr/yr

## 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	VOC tpy	95.0	Monthly	N
01	VOC content	8 wt. %	Monthly	N

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SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
02	Fuel Combusted	-	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02	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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Cooling Tower	A-13	0.86						
Crusher	A-13	0.017						

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 #
N/A

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Creative Foam  
Products, LLC.  
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			Old Permit	New Permit
\$/ton factor	25.13	Permit Predominant Air Contaminant	0	95.3
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
		Permit Fee \$	2394.889	
Check if Administrative Amendment	<input type="checkbox"/>	Annual Chargeable Emissions (tpy)	95.3	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0	0.4	0.4
PM <sub>10</sub>	0	0.4	0.4
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	0	0.1	0.1
VOC	0	95.3	95.3
CO	0	3.8	3.8
NO <sub>x</sub>	0	4.5	4.5
Total HAPs	0	0.09	0.09