

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0698-AR-34 AFIN: 50-00006

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Amrize Building Envelope LLC
1406 Highway 371 North
Prescott, Arkansas 71857

3. PERMIT WRITER:

Skylar Redman

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Rubber Product Manufacturing for Mechanical Use
NAICS Code: 326291

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
8/14/2025	Deminimis	Removal of 10 sources and addition of 6 sources

6. REVIEWER'S NOTES:

Amrize Building Envelope LLC owns and operates a rubber roofing manufacturing facility located at 1406 Highway 371 North, Prescott, Arkansas, Nevada County. The facility submitted an application for modification which includes: removal of Carbon Black Storage Tanks (SN-01A, 01B, 101A, 101B, and 201), Carbon Black Transfer (SN-17A and SN-17B), Carbon Black Rail Unloading (SN-301A and SN-304), Carbon Black Truck Unloading (SN-304A), addition of Carbon Black Storage Tanks (SN-401A and SN-401B), Carbon Black Storage Silos (SN-402A and SN-402B), Carbon Black Transfer

System (SN-403), Carbon Black Truck/Rail Unloading (SN-404), and rewording of specific condition #26. There are no changes to emissions in this permit modification.

7. COMPLIANCE STATUS:

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

The facility was last inspected on March 23, 2023 with no violations identified.

<https://echo.epa.gov/detailed-facility-report?fid=110000606657>

8. PSD/GHG 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*

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-503 & SN-504	There are no specific emission limits or pollutants identified, but the rules generally regulate HAPs	40 C.F.R. § 63 Subpart ZZZZ
SN-505 & SN-506	There are no specific emission limits or pollutants identified, but the rules generally regulate Criteria pollutants	40 C.F.R. § 60 Subpart IIII
SN-16D, SN-16E	(N/A), natural gas fired, only monthly recordkeeping applies.	40 C.F.R. § 60 Subpart 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. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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:

The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

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?
Allyl Chloride	3.12	0.344	0.01	Yes
Hexane	176	19.3	1.44	Yes
Methanol	262	28.8	0.24	Yes
Methylene Chloride	173	19.1	0.67	Yes
Toluene	75.3	8.28	2.17	Yes
Beryllium	0.00005	5.50E-06	2.00E-06	Yes
Chromium	0.01	1.10E-03	4.00E-04	Yes

No changes to these pollutants with permitting action R34.

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: No H₂S emissions

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
All PM Sources	Testing	Varies	None		PM/PM ₁₀ emissions from all particulate sources are based on testing data from the facility submitted on March 2, 1995 or based on process knowledge.
03, 103, & 104	Testing	lb/lb rubber: 4.2E-04 VOC lb/hr Total HAP: 0.63 (SN-03) 0.29 (SN-103) 0.35 (SN-104)	None		VOC and HAP emission factors are based on stack testing conducted in October 2011 plus a 25% safety factor.
13, 14, 114, 202, 206, 207, 312, 313, 323A, 323B, 330	Source Specific Emission Factors	Varies			VOC and HAP emission factors are based on stack testing conducted in October 2011.

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
08B, 08F to 08J	Source Specific Emission Factors	lb/lb rubber: 5.62E-05 VOC lb/hr Total HAP: 0.014 (B- F) 0.005 (G) 0.014 (H)	--	--	VOC and HAP emission factors are based on stack testing conducted in October 2011 plus a 25% safety factor.
16D & 16E	AP-42: 1.4	lb/MMSCF: 7.6 PM/PM ₁₀ 0.6 SO ₂ 5.5 VOC 84 CO 50 NO _x	--	--	
315	Mass Balance	lb/gal 2.1 VOC No HAPs	--	--	Stack testing for primers in excess of 2.1 lb VOC/gal
316	Mass Balance	lb/gal 1.87 VOC 1.87 Toluene			Automated and Manual rolling operations
317	Source Specific Emission Factors	Varies	--	--	VOC and HAP emission factors are based on stack testing conducted for SN-203 in October 2011.
500, 501	Mass Balance		None		Mass Balance assuming 100% of VOC in raw materials is emitted to atmosphere
502	Source Specific Emission Factor	0.58 lb PM/PM ₁₀ Per mandrel cleaned	--	--	--
503 - 506	AP-42, Table 3.3-1	lb/hp-hr: 2.2E-03 PM 2.05E-03 SO ₂ 2.47E-03 VOC 6.68E-03 CO	--	--	Emergency diesel fire pump, emergency generator, and two

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		0.031 NO _x			(2) diesel operated air compressors
401A, 401B, 402A, 402B	Site specific emission factor developed from testing conducted February 10, 1995	1.71E-05 lbs PM/PM ₁₀ /lb	--	--	99,338,400 lbs/yr of Carbon Black
403, 404	Site specific emission factor developed from testing conducted February 10, 1995	6.87E-06 lbs PM/PM ₁₀ /lb	--	--	99,338,400 lbs/yr of Carbon Black

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
03	VOC HAPs	Bench scale equivalent to approved test methods	Once every 60 months.	To verify site specific values.
03	VOC	25A	Once every 60 months. The last testing was conducted in October 2016.	
03	HAPs	SW-846 Method 0031 (modified), and/or EPA TO-15 (modified)	Once every 60 months. The last testing was conducted in October 2016.	To verify site specific values.

15. 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				

16. 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)
MSDS	Kept on site and updated annually	Continuously	No	
16D & 16E	Boiler fuel	Natural gas only	Continuously	No
16D & 16E	Boiler fuel combusted	None	Monthly	No
03, 103, 104	VOC emission factor	4.20E-04 lb VOC/lb rubber	Monthly	No
Plantwide	VOC emissions	95 tons per rolling 12-month period	Monthly	No
	VOC emission factors and monthly throughput	See Specific Condition 14		
Plantwide	HAP Emissions	Single HAP: 9.50 tpy Combined HAP: 24.50 tpy	Monthly	No
500	Cold Cleaning Solvent VOC Content	8.9 lb/gal No HAPs	Monthly	No
501	Inks and Cleaners VOC Content	8.0 lb/gal No HAPs	Monthly	No
315	Seam Tape Primer Machine Primer Formulation Limits	2.1 lb/gal (VOC content) or not to exceed 6.3 lb/hr No HAPs	Monthly	No

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
316	Primer Pre-Tape Formulation Limit	1.96 lb/gal VOC 1.87 lb/gal Toluene	Monthly	No
503 - 506	Hours of operation (each)	500 hours per calendar year	Monthly	No
503 - 506	Hours of operation	Anything in excess of 100 hours per calendar year must demonstrate that the engine still qualifies as an emergency engine as outlined in §60.4211(f)	Monthly	No
401A, 401B, 402A, 402B, 403, 404	Carbon black unloading	99,338,400 pounds per consecutive 12-month	Monthly	No

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
13, 206, 207, 323A, 323B, 503 - 506	20%	Department Guidance	Observation
03, 07, 16D, 16E, 18A, 18B, 101A, 101B, 102 - 104, 107, 116, 118, 120, 202, 205, 302, 303, 305 - 308, 309A, 309B, 310 - 312, 317, 318, 401A, 401B, 402A, 402B, 403, 404, 502	5%	Department Guidance	Observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
26	Testing has substantiated emission factors so further testing is not necessary.

19. 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
Devulcanization Paraffinic Oil Storage Tank (10,000 gallons)	3			0.0038			0.0038	0.0038
Diesel Storage Tank (650 gallons)	3			0.0005			0.0005	0.0005
Seam Tape Testing Lab Vent	5			0.19			0.095	0.19
Laboratory Oven Vent	5	0.0005		0.14			0.07	0.07
Curing Cooling Tower	13	0.71						
Chiller Cooling Tower	13	0.75						
Process Cooling Tower	13	0.41						
Mixtruder Cooling Tower	13	0.44						
Day Tanks for SN-317	13			1.09E-4			1.09E-4	1.09E-4
Comerio Line Shredder	13	0.10		0.1			0.06	0.11
Bark & Horz. Hog	13	1.05						
Slab Dip/Soap Tanks	13	1.05						
Cooling Tower	13	0.06						

Permit #: 0698-AR-34

AFIN: 50-00006

Page 10 of 10

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0698-AR-33

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Amrize Building
Envelope LLC
Permit Number: 0698-AR-34
AFIN: 50-00006

			Old Permit	New Permit
\$/ton factor	28.14	Permit Predominant Air Contaminant	93.4	93.4
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment <input type="checkbox"/>		Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	93.4	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	34.7	34.7	0
PM ₁₀	33.9	33.9	0
PM _{2.5}	0	0	0
SO ₂	0.9	0.9	0
VOC	93.4	93.4	0
CO	31.8	31.8	0
NO _x	42.1	42.1	0
Total HAPs	23.9	23.9	0