

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2194-AR-6 AFIN: 60-04308

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Cone Little Rock, LLC
1814 Central Airport Road
North Little Rock, Arkansas 72117

3. PERMIT WRITER:

Skylar Redman

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Other Chemical and Allied Products Merchant Wholesalers
NAICS Code: 424690

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
2/20/2025	Modification	Changing SN-19 to Aromatic 150 and SN-20 to Aromatic 200

6. REVIEWER'S NOTES:

With this modification, the facility is changing the contents of SN-19 from N-Methyl-2-Pyrrolidone to Aromatic 150 and SN-20 from N-Methyl-2-Pyrrolidone to Aromatic 200. Emission changes are as follows: an increase in 0.1 tpy of VOC.

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 February 06, 2014 with no violations identified.

<https://echo.epa.gov/detailed-facility-report?fid=110038128754>

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)
N/A		

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
None				

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:

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.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	19,421 gal 350,000 gal/yr Mineral Spirits >1%
02	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	19,421 gal 750,000 gal/yr Methanol
03	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	19,421 gal 300,000 gal/yr Acetone
04	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	10,358 gal 250,000 gal/yr NP-Alcohol

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
05	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	10,358 gal 250,000 gal/yr 142 Solvent
06	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	10,358 gal 250,000 gal/yr VM&P Naphtha
07	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	10,358 gal 470,000 gal/yr Aromatic 150
08	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	10,358 gal 250,000 gal/yr Iso Hexane
09	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	10,358 gal 250,000 gal/yr Methyl Ethyl Ketone
10	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	19,793 gal 100,000 gal/yr Isopropyl Alcohol
11	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	19,793 gal 250,000 gal/yr NP Alcohol #2

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
12	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_v a * Q * K_n * K_p$	N/A	N/A	19,793 gal 100,000 gal/yr Mineral Spirits Regular
13	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_v a * Q * K_n * K_p$	N/A	N/A	19,793 gal 100,000 gal/yr NP Acetate
14	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_v a * Q * K_n * K_p$	N/A	N/A	19,793 gal 300,000 gal/yr Acetone #2
15	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_v a * Q * K_n * K_p$	N/A	N/A	19,793 gal 300,000 gal/yr Acetone #3
16	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_v a * Q * K_n * K_p$	N/A	N/A	19,793 gal 200,000 gal/yr Aromatic 100
17	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_v a * Q * K_n * K_p$	N/A	N/A	19,793 gal 100,000 gal/yr Ethyl Acetate
18	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_v a * Q * K_n * K_p$	N/A	N/A	19,793 gal 250,000 gal/yr 300-360

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
19	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	19,793 gal 200,000 gal/yr Aromatic 150
20	Tanks 4.09 AP-42 Ch. 7	Tanks 4.09 Breathing Loss (Ls) = $365 \cdot V_v \cdot W_v \cdot K_e \cdot K_s$ Working Loss (Lw) = $Q_w \cdot 0.0010 \cdot M_v \cdot P_{va} \cdot Q \cdot K_n \cdot K_p$	N/A	N/A	19,793 gal 100,000 gal/yr Aromatic 200

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

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)
01	Type Product Throughput	Mineral Spirits >1% 350,000 gal/yr	Monthly	N
	Tank Dimensions	-		N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
02	Type Product Throughput	Methanol 750,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
03	Type Product Throughput	Acetone 300,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
04	Type Product Throughput	NP-Alcohol 250,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
05	Type Product Throughput	142 Solvent 250,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
06	Type Product Throughput	VM&P Naptha 250,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
07	Type Product Throughput	Aromatic 150 470,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
08	Type Product Throughput	Iso Hexane 250,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
09	Type Product Throughput	Methyl Ethyl Ketone 250,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
10	Type Product Throughput	Isopropyl Alcohol 100,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
11	Type Product Throughput	NP Alcohol #2 250,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
12	Type Product Throughput	Mineral Spirits Regular	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		100,000 gal/yr		
	Tank Dimensions	-		N
13	Type Product Throughput	NP Acetate 100,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
14	Type Product Throughput	Acetone #2 300,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
15	Type Product Throughput	Acetone #3 300,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
16	Type Product Throughput	Aromatic 100 200,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
17	Type Product Throughput	Ethyl Acetate 100,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
18	Type Product Throughput	300-360 250,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
19	Type Product Throughput	Aromatic 150 200,000 gal/yr	Monthly	N
	Tank Dimensions	-		N
20	Type Product Throughput	Aromatic 200 100,000 gal/yr	Monthly	N
	Tank Dimensions	-		N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
N/A			

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18. DELETED CONDITIONS:

Former SC	Justification for removal
None	

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
None								

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 #
2194-AR-5

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Cone Little Rock, LLC

Permit Number: 2194-AR-6

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			<table><tr><th>Old Permit</th><th>New Permit</th></tr><tr><td>7</td><td>7.1</td></tr></table>	Old Permit	New Permit	7	7.1
Old Permit	New Permit						
7	7.1						
\$/ton factor	28.14	Permit Predominant Air Contaminant					
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0.1				
Minimum Initial Fee \$	500						
		Permit Fee \$	<u>400</u>				
Check if Administrative Amendment	☐	Annual Chargeable Emissions (tpy)	<u>7.1</u> No Annual Fee				

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0	0	0
PM ₁₀	0	0	0
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	7	7.1	0.1
CO	0	0	0
NO _x	0	0	0
Acetone	2.52	2.52	0