STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1865-AOP-R11 AFIN: 07-00033

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Armtec Countermeasures Co.
Highland Industrial Park, Building M-7
East Camden, Arkansas 71701

3. PERMIT WRITER:

Dylan Cha

4. NAICS DESCRIPTION AND CODE:

NAICS Description: All Other Miscellaneous Chemical Product and Preparation Manufacturing
NAICS Code: 325998

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
8/31/2026	Renewal	Throughput of SN-03 increased via amendments to Specific Conditions 13 & 15. Increased number of OTTU's from 4 to 8. Revision to emission calculation of SN-05.

6. REVIEWER'S NOTES:

Armtec Countermeasures Company (Armtec) is located at Building M-7 in the Highland Industrial Park, East Camden, Calhoun County, Arkansas. Armtec manufactures and tests explosive ordnance and disposes of explosive/pyrotechnic waste in open thermal

treatment units. This permitting action is to renew the facility's Title V permit and propose the following modifications:

Open Thermal Treatment Units (OTTUs) in the R-15 Area (SN-03)

- SC 13 to be revised to increase the allowable quantity of waste burned from 1,000 pounds in any consecutive 24-hour period to 2,000 pounds in any consecutive 24-hour period.
- SC 15 to be revised to increase the annual throughput limit from 192,000 pounds per 12-month rolling period to 416,000 pounds per 12-month rolling period.
- Increasing the number of OTTUs in the R-15 Area from four to eight.

Emergency Generator (SN-05)

- Revise the emissions calculations to reflect the engine's maximum heat input rating of 1.337 MMBtu/hr, consistent with the manufacturer's nameplate data.

The permitted annual emission changes from this modification are as follows: an increase of 1.7 tpy PM, an increase of 1.2 tpy PM10, an increase of 0.8 tpy SO2, an increase of 0.3 tpy VOC, an increase of 1.0 tpy CO, an increase of 0.2 tpy NOX, and an increase of 0.04 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.

The facility was last inspected on January 15, 2025. No air-related areas of concern were noted at this time.

ECHO (https://echo.epa.gov/detailed-facility-report?fid=110000746364) shows no air violations identified as of October 23, 2025.

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)
05	HAPs	NESHAP JJJJ

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 8 CAR pt. 40 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) H_2S 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_2S Standards Y
If exempt, explain: No H_2S present

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H_2S	20 parts per million (5-minute average*)	0	Y
	80 parts per billion (8-hour average) residential area	0	Y
	100 parts per billion (8-hour average) nonresidential area	0	Y

*To determine the 5-minute average use the following equation

$Cp = Cm\ (t_m/t_p)^{0.2}$ where

Cp = 5-minute average concentration
Cm = 1-hour average concentration
t_m = 60 minutes
t_p = 5 minutes

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	450,000 lb VOC/year			Annual limits based on production rates. Hourly limits based on 4,000 hour /year operation
02	AP-42 Table 15.8.16-1 (7/2009) AP-42 Table 15.8.16-2 (7/2009)	lb/lb explosive wt NOx: 4.30E-04 CO: 4.20E-03 VOC: 1.30E-03 PM: 2.80E-02 PM_{10}: 2.00E-02 SO_2: 2.60E-02			Synthetic limitation of 40,000 lb/yr explosive material testing. Total maximum hourly testing rate is 90 lb/hr
03					Scenario A: Synthetic limitation of 500 lb/day and 130,000 lb/yr explosive material (Removed as of R10)
					Scenario B: Synthetic limitation of 2,000 lb/day and 416,000 lb/yr explosive material
04	AP-42 Tables 1.4-1 and 1.4-2	lb/MMscf NOx:100 CO: 84 VOC: 11 PM/PM_{10}: 7.6 SO_2:0.6			Group of boilers with a total natural gas heat input of 40 MMBtu/hr

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)
SN-05	Operation time	Timer	Monthly	N

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 Purchased	225 tpy	Monthly	Y
01	Acetone Purchased	350 tpy	Monthly	Y
02	Amount of Ordinance tested	40,000 lb/year	Monthly	Y
03	Amount of Waste Burned	2,000 lb/day	Daily	Y
03	Amount of Waste Burned	416,000 lb/year	Monthly	Y
04	Natural Gas Throughput	40.0 MMBtu/hr	Upon change of equipment	N
05	Operation Time	500 hrs/yr	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02	No Limit	Waiver from Opacity limits of Reg. 19 granted by July 17, 2002 letter from ADEQ Director	N/A
03	No Limit		N/A
04	5%	Department Guidance	Daily 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
250 Gallon Diesel Tank	3			0.1				0.01
Misc. Coatings, Adhesives, and Inks Usage	13			0.5				0.07

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 #
1865-AOP-R10

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Armtec Countermeasures Co.
Permit Number: 1865-AOP-R11
AFIN: 07-00033

$/ton factor	28.14	Annual Chargeable Emissions (tpy)	603
Permit Type	Modification	Permit Fee $	1000

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)	3
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		4.7	6.4	1.7	1.7	6.4
PM_{10}		3.8	5	1.2		
$PM_{2.5}$		0	0	0		
SO_2		0.4	1.2	0.8	0.8	1.2
VOC		227.3	227.6	0.3	0.3	227.6
CO		15.4	16.4	1		
NO_X		17.6	17.8	0.2	0.2	17.8
Total HAPs	☐	9.93	9.96	0.03		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Acetone	☑	350	350	0	0	350