

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2194-AR-7 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:

Shai Sabaroche

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
4/13/2026	Significant Modification	Changing SN-04 to Xylene, SN-15 to Toluene, and SN-17 to Kerosene

6. REVIEWER'S NOTES:

With this modification, the facility is changing the contents of SN-04 from 10,358 gal of NP-Alcohol to 10,556 gal of Xylene, SN-15 from 19,973 gal of Acetone to 19,973 gal of Toluene, and SN-17 from 19,973 gal of Ethyl Acetate to 19,973 gal of Kerosene.

Permitted annual emissions are: increased by 0.03 tpy of Xylene, 0.07 tpy of Toluene, and 0.01 tpy of Total Other HAPs; decreased by 1.5 tpy of VOC and 0.83 tpy of Acetone.

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, 2026 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
If yes, were GHG emission increases significant? N/A

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
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:

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: 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
01	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	19,421 gal 350,000 gal/yr Mineral Spirits >1%
02	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	19,421 gal 750,000 gal/yr Methanol
03	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	19,421 gal 300,000 gal/yr Acetone

SN	Emission Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
04	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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	N/A	N/A	10,556 gal 100,000 gal/yr Xylene
05	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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	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) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	N/A	N/A	10,358 gal 250,000 gal/yr VM&P Naptha
07	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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	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) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	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) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	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) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	N/A	N/A	19,793 gal 100,000 gal/yr Isopropyl Alcohol

SN	Emission Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
11	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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	N/A	N/A	19,793 gal 250,000 gal/yr NP Alcohol #2
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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	N/A	N/A	19,793 gal 100,000 gal/yr Toluene
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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	N/A	N/A	19,793 gal 150,000 gal/yr Kerosene

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	N/A	N/A	19,793 gal 250,000 gal/yr 300-360
19	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) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	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) = $365 * V_v * W_v * K_e * K_s$ Working Loss (Lw) = $Q_w * 0.0010 * M_v * P_{va} * Q * K_n * K_p$	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
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	Xylene 100,000 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

SN	Recorded Item	Permit Limit	Frequency	Report (Y/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 100,000 gal/yr	Monthly	N
	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	Toluene 100,000 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	Kerosene 150,000 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

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Tank Dimensions	-		N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
N/A			

18. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

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
N/A								

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-6

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-7

AFIN: 60-04308

\$/ton factor 28.14
 Minimum Fee \$ 400
 Minimum Initial Fee \$ 500

Permit Predominant Air Contaminant
 Net Predominant Air Contaminant Increase

	Old Permit	New Permit
7.1	7.1	5.6
-1.5	-1.5	
400	<u>400</u>	
5.6 No Annual Fee	<u>5.6</u>	

Check if Administrative Amendment

Permit Fee \$
 Annual Chargeable Emissions (tpy)

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	7.1	5.6	-1.5
CO	0	0	0
NO _x	0	0	0
Acetone	2.52	1.69	-0.83
Kerosene	0	0.01	0.01