

STATEMENT OF BASIS

for issuance of the draft Air Permit No. 1672-AOP-RO.

1. PERMITTING AUTHORITY

The issuing office is:

Arkansas Department of Pollution Control and Ecology
8001 National Drive
Post Office Box 8913
Little Rock, Arkansas 72219-8913

2. APPLICANT

The applicant is:

ACI - Coors Technical Ceramics Co.
3315 Boone Road
Benton, AR. 72015

3. PERMIT WRITER

The permit writer is:

Paul Osmon

4. PROCESS DESCRIPTION AND SIC CODE

Process Description:

High Tech Ceramics Manufacturer

SIC Code: 3264

5. BASIS FOR PERMIT CONDITIONS

The following is an explanation of the conditions of the draft permit and reasons for the decision:

Specific Condition(s): No. 5

Operational or production limit which directly correlates to a air contaminant. This facility is in a residential area and the number of batches limits the amount of ammonia emitted.

Plantwide Condition(s): No. 6

Operation or production limit which directly correlates to a criteria air pollutant. Limiting amount of binder limits the amount of VOC emitted from the kilns.

Plantwide Condition(s): No. 8 & 9

Nuisance prevention in a predominantly residential area.

The following specific conditions were established in permit No. 1672-A and were not reviewed in this permitting action:

Plantwide No. 10.

The following specific conditions provide emission limitations. Emission limitations are addressed in Section 6 of this document and are not addressed in the Basis for Permit Conditions:

Specific Condition No. 1, 2 and 5.

6. CALCULATIONS

- a. The permit writer has reviewed and concurs with the calculations/emission estimates provided in the permit application for the following sources:

Source No. 1 through 8

- b. Emission limits for the following sources were established in Permit No. 1672-A and were not reviewed in this permitting action:

The original permit reviewed all sources, but questioned the accuracy of the calculations. Testing requirements were in the SIP permit. Actual testing has been completed with emission levels found to be far below the permittee's calculations.

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c. The permit writer deleted the following provisions from the previous permit:

Opacities were eliminated because all emissions are VOCs (no particulate).
Natural gas usage and combustion emissions were eliminated as de minimis

7. **COMPLIANCE PLAN AND SCHEDULE**

(If applicable, Title V only)

The writer concurs with the compliance plan and schedule submitted by the applicant.

8. **REFERENCES**

- d. Air Permit Application received June 10, 1997
- e. Regulation No. 19, as amended July 1, 1997
- c. Regulation No. 26, as amended January 27, 1995
- d. Arkansas Air Pollution Control Code, as amended July 1, 1997
- e. Actual stack test results in enforcement files.

9. **CONCURRENCE BY**

The following supervisor concurs with the permitting decision:

Steve Patrick