

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1672-AR-10 AFIN: 63-00164

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

CoorsTek Benton  
3315 Boone Road  
Benton, Arkansas 72015

3. PERMIT WRITER:

Shawn Hutchings

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Pottery, Ceramics, and Plumbing Fixture Manufacturing  
NAICS Code: 327110

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
10/30/2017	Administrative Amendment	None. Deleted Sources Only

6. REVIEWER'S NOTES:

Coorstek, Inc. owns and operates a high technology custom ceramic product manufacturing facility located at 3315 Boone Road, Benton, AR. This administrative amendment removes SN-06 and SN-07. The facility originally submitted a modification to add NSPS Subpart UUU conditions for sources SN-06 and 07. During the review process those sources were removed from service. The modification was processed as an administrative amendment to remove those sources.

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 subject to NSPS Subpart UUU for SN-06 and 07. The permit had not previously contained the necessary compliance conditions. The sources have been removed from the facility.

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

b) Is the facility categorized as a major source for PSD? N

- *Single pollutant  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  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)
None		

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. 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 ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
04 and 05	Testing	Varied	None	none	

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
This permit requires no testing.				

14. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

This permit requires no monitoring or CEMs.

15. 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)
03	throughput	1,200,000 lbs	Monthly	N
04, 05	throughput	771 tons	Monthly	N
08	throughput	455,000 lbs	Monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
03, 04, 05, 08	5%	Department Guidance	Inspector to verify upon inspection and natural gas combustion.

17. DELETED CONDITIONS:

Former SC	Justification for removal
	No conditions were deleted. There were no conditions that solely applied to the removed sources.

18. 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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Alumina Lap and Polish (inorganic water-based slurry, wet process, no emissions)	A-13	0						
Alumina Shake and Dye (liquid water-based dye, Magnaflux SKL-4C, no emissions)	A-13	0						
Alumina Grinding (water-based wet process, no emissions)	A-13	0						
Silicon Lap and Polish (inorganic water-based slurry, wet process, no emissions)	A-13	0						
Solvent Cleaner/Degreaser (All-Purpose Simple Green Cleaner (ready-to-use) water-based wet process, no emissions, <1.2% VOC, 4 drums/yr)	A-13	0						
Foam for packing part in nitrite area (two-part spray, Instapak "A" and	A-13	0						

Gflex "B", non-VOC, no emissions)								
Baghouses (used for intermittent housekeeping <i>only</i> , not control equipment) (formerly SN-11, 12, 13, 14, 15, 16, 17 and 19)	A-13	0.1						
Alumina Was Line	A-13		0.43					
Test Kiln, electric, not in use	A-5	0						

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1672-AR-9



## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION





