

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1672-AR-7 AFIN: 63-00164

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Alumina Ceramics, Inc. d/b/a CoorsTek  
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. SUBMITTALS:

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
6/8/2015	AA	None.

6. REVIEWER'S NOTES:

This permit is an administrative amendment to correct changes which were not made during the comment period of previous permit. Emission rates, process descriptions, and the throughput limit for SN-08 were corrected.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

8. PSD 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  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list*

If yes, 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:

a) Reserved.

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
03 through 08	Testing	Varied per source	None	N/A	Highest tested rates were applied to a theoretical maximum throughput.

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.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
This permit requires no monitoring.				

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)
08	Throughput and content limits	Table SC 07	Monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 03, 04, 05, 06, 07, 08	5%	Department Guidance	Inspector to Verify upon inspection and proper equipment operation

17. DELETED CONDITIONS:

Former SC	Justification for removal
	No Conditions were deleted

18. GROUP A INSIGNIFICANT ACTIVITIES:

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 Gflex "B", non-VOC, no emissions)	A-13	0						
Baghouses (used	A-13	0.1						

for intermittent housekeeping <i>only</i> , not control equipment) (formerly SN-11, 12, 13, 14, 15, 16, 17 and 19)								
Alumina Was Line	A-13		0.43					
Test Kiln, electric, not in use	A-5	0						

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1672-AR-6



## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION





