

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0620-AR-12 AFIN: 33-00002

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Unimin Corporation
Main Street
Guion, Arkansas 72540

3. PERMIT WRITER:

Shawn Hutchings

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Industrial Sand Mining
NAICS Code: 212322

5. SUBMITTALS:

11/6/2013

6. REVIEWER'S NOTES:

Unimin Corporation owns and operates a silica sand mine and processing plant in Guion (Izard County). This deminimis permit is to remove the specific product names from the usage limits for SN-56 and replace them with general name and content limits.

7. COMPLIANCE STATUS:

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

There are no known enforcement issues with the facility.

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 ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list, or*
 - *CO₂e potential to emit ≥ 100,000 tpy and ≥100 tpy/≥250tpy of combined GHGs?*

If yes, explain why this permit modification is not PSD.

9. GHG MAJOR SOURCE (TITLE V):

Indicate one:

- Facility is classified as a major source for GHG and the permit includes this designation
- Facility does not have the physical potential to be a major GHG source
- Facility has restrictions on GHG or throughput rates that limit facility to a minor GHG source. Describe these restrictions: _____

10. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility-wide	PM/PM ₁₀	NSPS Subpart OOO
SN-58	NO _x , CO, VOC, HAP	40 CFR 60, Subpart JJJJ 40 CFR 63, Subpart ZZZZ

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

NAAQS: Pursuant to Act 1302 of the Regular Session of the 89th General Assembly of the State of Arkansas, no dispersion modeling was performed by ADEQ because it was not voluntarily proposed and agreed to by the facility. No other information was submitted by the applicant. Criteria pollutants were not evaluated for impacts on the NAAQS.

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

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
56	AP-42 natural gas and mass balance @ 96% conversion at RTO	Varied	RTO	96%	

14. TESTING REQUIREMENTS:

No additional testing was required.

15. MONITORING OR CEMS:

No additional monitoring or CEMs were required.

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)
56	VOC/HAP usage	Specific Condition 39	Monthly	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
56	5	Department Guidance	Inspector to verify upon inspection.

18. DELETED CONDITIONS:

Former SC	Justification for removal
There were no deleted conditions.	

19. GROUP A INSIGNIFICANT ACTIVITIES:

There were no changes to the insignificant activities.

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

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21. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.



Phillip Murphy, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 08-26-13

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			Old Permit	New Permit
\$/ton factor	23.42	Permit Predominant Air Contaminant	120.4	120.4
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	120.4	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	120.4	120.4	0
PM ₁₀	42.2	42.1	-0.1
SO ₂	1	0.9	-0.1
VOC	20.5	23.6	3.1
CO	21.4	21.4	0
NO _x	46.1	44.7	-1.4
Formaldehyde	9.47	9.51	0.04
Methanol	0	0.3	0.3
Phenol	6.31	9.5	3.19
Ammonia	0.01	0.01	0