

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0620-AR-13 AFIN: 33-00002

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Unimin Corporation - Guion Facility
Main Street
Guion, Arkansas 72540

3. PERMIT WRITER:

Shawn Hutchings

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Industrial Sand Mining
NAICS Code: 212322

5. ALL 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
1/24/2017	Deminimis	New truck unloading. SN-70

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 for additional chute work to allow residual material in railcars to be diverted day tanks or onto trucks for disposal, (LS-525, SN-70). Permitted emission rates increased 0.2 tpy of particulate matter and 0.1 tpy of PM₁₀.

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 actions against 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*

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

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

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

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:

12. 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%	
70	Drop Point Equation AP-42	Equation	None		

13. TESTING REQUIREMENTS:

No additional testing was required.

MONITORING OR CEMS:

No additional monitoring was required.

14. 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
Plant wide throughput Specific Condition 7	Sand processed Resin processed Chemical additives	Not specified in confidential application	Monthly	N
Portable crusher throughput 35, 36, 37, 38, 39	Tons processed	Not specified in confidential application	Monthly	N
40	Diesel used	Not specified in confidential application	Monthly	N
Facility	OOO Records	None	As needed	N
Facility	ZZZZ Records	None	As needed	N

15. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01	10 - Dryer and Scrubber	Department Guidance	Proper Equipment operation and inspector to verify upon inspection.
02	10	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
02A	10	NSPS Limit	Proper Equipment operation and

SN	Opacity	Justification for limit	Compliance Mechanism
			inspector to verify upon inspection
03	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
04	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
05	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
06	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
07	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
08	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
10	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
12	20	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
13	20	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
14	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection

SN	Opacity	Justification for limit	Compliance Mechanism
15	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
18	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
19	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
20	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
21	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
22	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
23	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
24	10	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
25	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
26	15	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
27	15	NSPS Limit	Proper Equipment operation and inspector to verify

SN	Opacity	Justification for limit	Compliance Mechanism
			upon inspection
28	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
29	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
32	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
33	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
34	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
35	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
36	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
37	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
38	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
39	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
40	20	NSPS Limit	Proper Equipment

SN	Opacity	Justification for limit	Compliance Mechanism
			operation and inspector to verify upon inspection
41	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
42	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
43	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
44	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
45	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
46	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
47	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
48	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
49	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
52	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection

SN	Opacity	Justification for limit	Compliance Mechanism
53	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
54	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
55	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
56	5	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
57	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
58	5	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
59	0	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
66	12	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
67	10	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
68	12	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
69	10	NSPS Limit	Proper Equipment operation and inspector to verify

SN	Opacity	Justification for limit	Compliance Mechanism
			upon inspection
70	20	Department Guidance	Proper Equipment operation and inspector to verify upon inspection

16. DELETED CONDITIONS:

Former SC	Justification for removal
No conditions were deleted	

17. GROUP A INSIGNIFICANT ACTIVITIES:

There were no changes to the insignificant activities.

18. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
0620-AR-12

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

