

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1195-AR-4 AFIN: 08-00066

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

ERLEN Group Carroll County Stone, LLC
26 County Road CR 704
Berryville, Arkansas 72616

3. PERMIT WRITER:

Elliott Marshall

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Crushed and Broken Limestone Mining and Quarrying
NAICS Code: 212312

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
3/27/2025	Modification	-Remove SN-14 -Correct emission summary totals

6. REVIEWER'S NOTES:

The facility submitted an application to:

1. Remove Sources: SN-14 Caterpillar 15 Diesel Engine (associated Specific Conditions #6 through #9 and #27 through #35) and SN-27 Storage Tanks.
2. Remove all three instances of Insignificant Activity (IA) group A-3 #2 Diesel Tanks (500 gal, each).
3. Add the following IA's: 10,000 gallon diesel tank at Shop (A-3 IA) and two portable welders (B-14 IA) at the portable plant

4. Add SN-28, Portable Plant Emergency Pump Engine (115 HP, diesel) subject to NSPS IIII and NESHAP ZZZZ (new Specific Conditions #23 through #33).
5. Corrected emission summary totals; previous totals omitted 0.2 tpy of PM.

Permitted emission rates are increasing/decreasing by: 0.2 tpy PM, -1.1 tpy SO₂, -1.4 tpy VOC/NO_x, -3.4 tpy CO and -0.02 Total HAPs

The 0.2 tpy PM increase stems from using the incorrect tpy value for SN-13 in the previous revision. The correct tpy rate for PM at SN-13 is 0.7; emissions were totaled with the incorrect value of 0.5 tpy PM previously.

7. COMPLIANCE STATUS:

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

This permitting action serves to permit an unpermitted emergency engine, SN-28. Enforcement is in the process of drafting a CAO for other various compliance issues including failure to comply with an undelegated NSPS requirement and failure to meet record keeping or reporting conditions that are for enforcement of a non-criteria pollutant emission limit.

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/A

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 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)
SN-15 Through SN-24	Particulate	40 CFR 60, Subpart OOO
SN-28	There are no specific emission limits or pollutants identified, but the rules generally regulate HAPs	40 CFR 60, Subpart IIII 40 CFR 63, Subpart ZZZZ

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
N/A				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Rule 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N/A
If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
N/A		

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
N/A		

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. 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 DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

The non-criteria pollutants listed below were evaluated. Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

The table below was not updated with this permit revision. Emergency engine SN-28 was added; contributions from emergency engines are not included in the lb/hr totals listed below.

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Acetaldehyde	45	4.95	0.01	Y
Acrolein	0.2	0.02	0.01	Y
Benzene	1.6	0.176	0.02	Y
Formaldehyde	1.5	0.165	0.01	Y
Toluene	75.3	8.23	0.01	Y
Xylenes	434	47.7	0.01	Y

c) H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards

Y

If exempt, explain: No H₂S emissions.

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
06	AP-42	0.0002 lb/ton PM 0.0001 lb/ton PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
07	AP-42	0.043 lb/ton PM 0.0203 lb/ton PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
09	AP-42	4.95 lb PM/blast 2.57 lb PM ₁₀ /blast	None	N/A	Based on maximum annual throughput of 250,000 tpy.
10	AP-42	1.3 lb/hole	None	N/A	Based on maximum annual throughput of 250,000 tpy.
11	AP-42	15.9 lb/VMT PM 4.69 lb/VMT PM ₁₀	Water Truck	75%	Based on the trucks watering the road surfaces every 20 minutes.
12	AP-42	0.000032 lb/ton PM 0.000016 lb/ton PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
13	AP-42	0.00014 lb/ton PM 4.6E-05 lb/ton PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
15	AP-42	lb/ton 5.93E-4 PM 1.60E-05 PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
16	AP-42	lb/ton 0.003 PM 0.0012 PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
17	AP-42	lb/ton 0.00014 PM 4.60E-05 PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
18	AP-42	lb/ton 0.0036 PM 0.0022 PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
19	AP-42	lb/ton 0.003 PM 0.0012 PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
20	AP-42	lb/ton 0.00014 PM 4.60E-05 PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
21	AP-42	lb/ton 0.0036 PM 0.0022 PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
22	AP-42	lb/ton 0.00014 PM 4.60E-05 PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
23	AP-42	lb/ton 0.0036 PM 0.0022 PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
24	AP-42	lb/ton 0.00014 PM 4.60E-05 PM ₁₀	None	N/A	Based on maximum annual throughput of 250,000 tpy.
28	AP-42 Manufacturer Certified Tier II	<u>lb/MMBtu</u> SO ₂ : 0.29 VOC: 0.36 <u>g/kW-hr</u> PM/PM ₁₀ : 0.3 CO: 5.0 NO _x : 6.6	None	N/A	500 hr/yr

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

17. 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)
N/A				

18. 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)
28	Hours of operation	500 hours per rolling 12-month	Monthly	N
SN-01, SN-02, SN-04, SN-05A-F	Operating Rates	500,000 tons per rolling 12-month	Monthly	N
SN-15 through SN-24	Operating Rates	250,000 per rolling 12 month	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02,04,	15%	§60.672	Inspector Observation
5A,5B,5C,5D,5F,06 07,09,10,11,12,13, 28	20%	Rule 19.503	Inspector Observation
5E	10%	§60.675	Inspector Observation
15,17,18,20-24	7%	§60.672	Inspector Observation
16,19	12%	§60.672	Inspector Observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
#6 through #9	SN-14 no longer in service
#27 through #35	

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21. 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 ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
10,000 gallon Diesel Tank at the Shop	A-3	--	--	0.015	--	--	--	--

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1195-AR-3

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: ERLen Group Carroll
 County Stone, LLC
 Permit Number: 1195-AR-4
 AFIN: 08-00066

			Old Permit	New Permit
\$/ton factor	28.14	Permit Predominant Air Contaminant	75	75.2
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0.2	
Minimum Initial Fee \$	500			
		Permit Fee \$	400	
Check if Administrative Amendment	<input type="checkbox"/>	Annual Chargeable Emissions (tpy)	75.2	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	75	75.2	0.2
PM ₁₀	37.6	37.6	0
PM _{2.5}	0	0	0
SO ₂	1.2	0.1	-1.1
VOC	1.5	0.1	-1.4
CO	3.7	0.3	-3.4
NO _x	1.8	0.4	-1.4
Total HAPs	0.03	0.01	-0.02