

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0620-AR-16 AFIN: 33-00002

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Covia Solutions LLC - Guion Facility
421 Main Street
Guion, Arkansas 72540

3. PERMIT WRITER:

Jimmy Do

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Industrial Sand Mining
NAICS Code: 212322

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
4/10/2025	Modification	Add Drilling and Blasting Operations as SN-72 and Truck Hauling on Unpaved Roads as SN-73. Twenty (20) 0.225 MMBtu/hr Winter Kerosene Heaters at Belt Conveyors and 550-gallon Kerosene Tank will be added to the Insignificant Activities list.

6. REVIEWER'S NOTES:

This permit modification is to add Drilling and Blasting Operations as SN-72 and Truck Hauling on Unpaved Roads as SN-73. Twenty (20) 0.225 MMBtu/hr Winter Kerosene Heaters at Belt Conveyors and 550-gallon Kerosene Tank will be added to the

Insignificant Activities list. Permitted emissions increased for PM by 95.0 tpy and PM10 by 30.8 tpy.

7. COMPLIANCE STATUS:

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

The last inspection was conducted July 17, 2025. No areas of concern were identified. A review of ECHO revealed no additional CAA violations in the last twelve quarters.

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)
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
71	HAPs	40 CFR 63, Subpart CCCCC

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
None				

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 8 CAR pt. 40 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N/A

If not, explain why.

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
None		

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.

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

N

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
56	AP-42 for natural gas combustion. And engineering studies this source	Varied	RTO	96%	
71	Tanks	Equation	None		
72	AP-42 Ch. 11.9, Table 1	PM = 10.02 lb/blast PM ₁₀ = 5.21 lb/blast			
73	AP-42 Chapter 13.2.2	PM = 9.313 lb PM/VMT PM ₁₀ = 2.851 lb PM ₁₀ /VMT			

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
SN-43	PM	5	Initial	NSPS

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)
None				

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)
56	VOC/HAP usage	Specific Condition 41	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
56	Throughput	280,800	Monthly	N
71	Throughput	12,000 gal	Monthly	N
72	Throughput	86 Blast/12 months	Monthly	N
73	Throughput	120 loads/ day, 24,960 loads/12 months	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
59	0%	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
56	5%	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
58	5%	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection

SN	Opacity	Justification for limit	Compliance Mechanism
43	7%	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
2, 24	10%	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
02A, 3, 4, 5, 6, 7, 8, 18, 19, 22, 23, 28, 29, 32, 33, 34, 44, 45, 46, 47, 48, 49, 52, 53, 54, 55, 57, 67, 69	10%	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
66, 68	12%	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
26, 27	15%	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection
10, 14, 15, 20, 21, 25, 35, 36, 37, 38, 39, 41, 42, 70	20%	Department Guidance	Proper Equipment operation and inspector to verify upon inspection
12, 13, 40	20%	NSPS Limit	Proper Equipment operation and inspector to verify upon inspection

20. DELETED CONDITIONS:

Former SC	Justification for removal
	None

The following is a list of Insignificant Activities including revisions by this permit.

[illegible]

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Feed Tank – 11,850 gallons								
T-636 Process Water Tank – 11,850 gallons	A-13	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01

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 #
0620-AR-15

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Covia Solutions LLC -
Guion Facility
Permit Number: 0620-AR-16
AFIN: 33-00002

			Old Permit	New Permit
\$/ton factor	28.14	Permit Predominant Air Contaminant	120.9	215.99
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	95.09	
Minimum Initial Fee \$	500			
		Permit Fee \$	2675.8326	
Check if Administrative Amendment	☐	Annual Chargeable Emissions (tpy)	215.99	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	120.9	215.99	95.09
PM ₁₀	42.4	73.2	30.8
PM _{2.5}	0	0	0
SO ₂	0.9	0.9	0
VOC	25.6	25.6	0
CO	52.6	52.6	0
NO _x	96	96	0
Formaldehyde	9.91	9.91	0
Methanol	0.4	0.4	0
Phenol	9.9	9.9	0
Ammonia	5	5	0
HAPs	0.01	0.1	0.09