

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1016-AOP-R21 AFIN: 10-00004

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Elemental Environmental Solutions LLC  
500 East Reynolds Road  
Arkadelphia, Arkansas 71923

3. PERMIT WRITER:

Sterling Powers

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Hazardous Waste Treatment and Disposal  
NAICS Code: 562211

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, De Minimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
2/06/2026	Minor Mod	Reduce waste feed inputs and go to a 1 kiln scenario
02/06/2026	Minor Mod	Revise the Lime Slurry Mixing Tank (SN-44)
03/13/2026	Minor Mod	Add emissions for breathing losses from SN-58

6. REVIEWER'S NOTES:

Elemental Environmental Solutions LLC (EES) operates a hazardous waste and spent potliner thermal treatment process at its facility located in Gum Springs, Arkansas. This modification proposes the following:

- Revise emissions for the Lime Slurry Make Up System (SN-44) and rename it to ‘Lime Slurry Mixing Tank With Vents,’ based on the release of new updated emission factors in AP-42. Rename SN-43 to “Lime Silos (2)” to reduce confusion with previous descriptions.
- Review the throughput conditions for SN-43 and SN-44 and remove the redundant recordkeeping of SN-44. SN-44 has a throughput of 17,000 tons of lime slurry per rolling 12 month period, while SN-43 has a throughput of 9,000 tons of lime slurry per rolling 12 months. Since SN-44 is fed by SN-43, the smaller throughput will always be the effective limit, so the larger limit at SN-44 is redundant. The throughput condition and record-keeping of 17,000 tons of lime slurry at SN-44 will be removed.
- Reduce the permitted solid feed rate for each individual Kiln at SN-19 from 30 tons/hr to 15 tons/hr, and increase the permitted liquid feed rate for each individual kiln at SN-19 from 15 gal/min to 21.8 gal/min.
- Remove the ability for the facility to operate both kilns simultaneously.
- Update permit language to clarify the facility will alternate between the two kilns at SN-19, rather than operating simultaneously.
- Add an alternative scenario to the Bisulfite Tank emissions in SN-58, based on breathing losses, to account for the tank headspace being passively emitted during downtime of the incinerator scrubber.

Permitted emissions will increase by 0.4 tpy PM<sub>10</sub>, 0.6 tpy PM, 3.1 tpy SO<sub>2</sub>, and 2.3 tpy CO.

7. COMPLIANCE STATUS:

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

Facility was last inspected on January 30, 2025. No issues were found.

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

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 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)
01, 05-16, 18, 20-27, 32, 45, 48	PM <sub>10</sub>	CAM
Facility	All	NESHAP 40 C.F.R. § 63 Subpart EEE
41, 49, 57A, 57B	HAPs	NSPS 40 C.F.R. § 60 Subpart III
33	HAPs	NESHAP 40 C.F.R. § 63 Subpart ZZZZ
19	NO <sub>x</sub> , CO & O <sub>2</sub> , SO <sub>2</sub>	CEMs
34	HAPs	NESHAP 40 C.F.R. § 63 Subpart DD, 40 CFR 60 Subpart Kb, 40 CFR 60 Subpart VVa
35	VOCs, HAPs	40 CFR 60 Subpart VVa 40 CFR 60 Subpart VVb
37	Benzene	40 CFR 61 Subpart FF
40, 58	CO, O <sub>2</sub> , SO <sub>2</sub> and NO <sub>x</sub>	CEMS
40	Mercury	40 CFR Part 61 Subpart E
40	Beryllium	40 CFR Part 61 Subpart C
41	HCl, HF	CEMS
50, 51, 52, 53	HAPs	40 CFR Part 60 Subpart JJJJ

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 8 CAR pt. 40 requirement.)

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
01, 05-16, 18, 20-27, 32, 45, 48	PM/PM <sub>10</sub>	5 opacity exceedances in any 6 month period
19	all	COM limit for more than two consecutive hours, operates outside the range of Continuous Pressure Differential Reading, or fails two consecutive stack tests
41	HCl, HF	Three-hour rolling average

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.

1<sup>st</sup> 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 ( $\text{mg}/\text{m}^3$ ), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV ( $\text{mg}/\text{m}^3$ )	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Ammonia	17.41	1.92	19.38	N
Arsenic Compounds	0.01	0.0011	0.03	N
Beryllium Compounds	0.002	2.2E-04	0.03	N
Cadmium Compounds	0.01	0.0011	0.05	N
Chlorine	1.45	0.1595	16.04	N
Chromium Compounds	0.01	0.0011	0.03	N
Fluoride Compounds	2.5	0.275	2.88	N
Hydrogen Fluoride	0.5	0.055	9.9	N
Hydrochloric Acid	2.98	0.3278	26.48	N
Mercury	0.025	0.00275	0.026	Y
Polycyclic Aromatic Hydrocarbons*	0.2	0.022	0.71	N
Lead	0.05	0.0055	0.056	N
Bromine	0.6536	0.0718	4.47	N
Selenium	0.2	0.022	0.47	N
Antimony	0.5	0.055	0.03	Y
Cobalt	0.02	0.0022	0.03	N
Manganese Compounds	0.02	0.0022	0.03	N
Acetaldehyde*	45.0	4.95	0.000922	Y
Acrolein*	0.23	0.025	0.0001829	Y
Benzene	0.063	0.007	4.14	N
1,3-Butadiene*	4424.7	486.7	0.000047	Y
Formaldehyde*	15.0	1.65	0.02143	Y

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Toluene*	188.0	20.7	0.00492	Y
Xylene*	434.0	47.7	0.000343	Y
Hexachlorobenzene	0.002	0.00022	0.37	N
Hexachlorobutadiene	0.213	0.023	4.7	N
Methanol	262.08	28.82	10.41	Y
Methylene Chloride	210.47	23.15	10.41	Y

\*Emergency generators have not been modeled.

## 2<sup>nd</sup> Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Division of Environmental Quality to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL (µg/m <sup>3</sup> ) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m <sup>3</sup> )	Pass?
Ammonia	200=Annual 3200=1 Hour	4.37=Annual 254.3=1 Hour	Y
Arsenic Compounds	0.1	0.001	Y
Beryllium Compounds	0.02	0.002	Y
Bromine	6.536	0.396	Y
Benzene	0.64	0.953	Y
Cadmium Compounds	0.1	0.00384	Y
Chlorine	14.5	1.72	Y
Chromium Compounds	0.1	0.00405	Y
Fluoride Compounds	4.09	4.026	Y
Hydrogen Fluoride	0.55	4.026	Y
Hydrochloric Acid	29.8	4.478	Y

Pollutant	PAIL ( $\mu\text{g}/\text{m}^3$ ) = 1/100 of Threshold Limit Value	Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	Pass?
Mercury	0.25	0.00215	Y
Polycyclic Aromatic Hydrocarbons*	2.0	0.0629	Y
Lead	0.5	0.0054	Y
Bromine	6.53	0.3965	Y
Selenium	2.0	0.00396	Y
Cobalt	0.2	0.00168	Y
Hexachlorobenzene	0.02	0.019	Y
Hexachlorobutadiene	2.13	0.9815	Y
Manganese	0.2	0.00235	Y
Formaldehyde	1.5	0.757	Y

a) H<sub>2</sub>S 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.

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H <sub>2</sub> S	20 parts per million (5-minute average*)	0.19 ppm	Y
	80 parts per billion (8-hour average) residential area	N/A	Y
	100 parts per billion (8-hour average) nonresidential area	29.0 ppb (41.1 mg/m <sup>3</sup> )	Y

\*To determine the 5-minute average use the following equation

$$C_p = C_m (t_m/t_p)^{0.2} \text{ where}$$

C<sub>p</sub> = 5-minute average concentration

C<sub>m</sub> = 1-hour average concentration

t<sub>m</sub> = 60 minutes

t<sub>p</sub> = 5 minutes

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01, 05, 06, 26, 27, 30, 31	Grain Loading	0.002 gr/acf	Baghouse	99.9%	
07, 08, 09, 10, 11, 12, 13, 14, 15, 16, 18, 20, 21, 22, 23, 24, 25	Grain Loading	0.005 gr/acf	Baghouse	99.9%	
19 and 40	MACT EEE Limits, Stack Testing (SO <sub>2</sub> ), and Waste Analysis for VOC	SO <sub>2</sub> Max %: 4.0 Max Flow= 21.8 gal/min SO <sub>2</sub> = (0.24 lb SO <sub>2</sub> /lb S)(510 lb S supplied/hr)= 122.4 lb/hr SO <sub>2</sub> = 241.1 tpy NO <sub>x</sub> testing showed max to be much lower (29.62 lb/hr & 129.7 tpy) than permitted, but leaving it the same as last permit.	Afterburner Baghouse	99.9% 99.9%	Throughput higher than 15tph, SO <sub>2</sub> = 0.18 lb SO <sub>2</sub> /lb S Less than = 0.24
32	AP-42 11.19.2  MSDS  AP-42 3.3	Operation lb/ton Screen=0.072 Crusher=0.015 Loading/Unloading= 0.0004 Conveyor= 0.0077 2 <sup>nd</sup> Cut = 0.1% Sodium Beryllium Fluoride Based on Molecular Weight Ratio  PM= 0.31 lb/MMBtu PM <sub>10</sub> = 0.31 lb/MMBtu SO <sub>2</sub> = 0.29 lb/MMBtu VOC= 0.36 lb/MMBtu CO= 0.95 lb/MMBtu NO <sub>x</sub> = 4.41 lb/MMBtu	Primary Screen= Baghouse  Crusher= Building  Loading/Unloading= Baghouse  Conveyor (7 drop off pts)= building	99.9%  80%  99.9%  80%	Portable Baghouse is operated by electric motor  8,760 hr/yr  Max weight fraction Fluoride: 5.57E-01 g F / g material feed  Beryllium: 6.87E-05 g Be / g material feed  Air Flow: 40,000 ACFM  PM/PM <sub>10</sub> : 7000 grain/lb

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		PM/PM10: Outlet loading:0.01 grains/ft <sup>3</sup>			H2S: 379.5 scf/lbmol  H2S: 2.5 ppmv, 50% of ppmv of the operable limit of the H2S meter (5.0 ppmv)
33	AP-42 Chapter 3.3 for Combustion	<u>lb/MMBtu</u> PM=0.31 PM <sub>10</sub> =0.31 SO <sub>2</sub> =0.29 VOC=0.36 CO=0.95 NO <sub>x</sub> =4.41	None	N/A	Calculated at 1,000 hours of operation per year
34	Table 2-9, 2-11 of EPA "Protocol for Equipment Leak & Emission Estimates" Nov, 1995	Light liquid valves: 6.4E-06 kg/hr Liquid Liquid Pumps: 1.9E-05 kg/hr Connectors: 3.05E-06 kg/hr	None	N/A	<u>Max VOC Concentration</u> 500 ppmv Light Liquid Valves= 154 Light Liquid Pumps= 51 Connectors= 411  Screening Value: 500 ppmv
35	Tanks Program	Organic Fuel Max throughput= 47,240,209 gal/yr Worst Case= 100% throughput Methyl Alcohol	Tank Vent	99.99%	22 Tanks Each with 2 carbon tanks in series  1 railcar and two tankers are unloaded per hour, turnover is 37 times per year
36	AP-42 Table 11.19.2	Max throughput = 200,000 ton/yr  0.0085 lb PM/ton 0.0035 lb PM <sub>10</sub> /ton	None	N/A	Half of PM assumed to be PM <sub>10</sub>

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
41	AP-42 Boiler Emission factors, natural gas combustion emission factors	PM/PM <sub>10</sub> : 7.6 lb/MMscf SOX: 0.6 lb/MMscf VOC: 5.5 lb/MMscf CO: 84 lb/MMscf NOX: 0.0969 lb/MMbtu	RTO	98%	Building/Pit Emissions to the RTO 21,000 scfm 400 ppmv average 700 ppmv maximum  RTO Combustion: 3431.37 scf/hr 8760 hours  Input duty: 3.5 MMBTU/hr
42	AP-42 11.12.2	0.73 lb/ton PM 0.47 lb/ton PM10	Baghouse Filter Vent	99%	11.3 ton/hr (100 ton/day)  # of drops: 2 Annual TP: 29,400 ton/yr
43 44	AP-42 11.12.2	0.73 lb/ton PM 0.47 lb/ton PM10	Baghouse Vent Breather Sock Wet Suppression	99% 95% 75%	25 ton/hr (100 tons/day) # of drops: 2 9,000 ton/yr  3.1 ton/hr max hourly
38		PM/PM <sub>10</sub> 0.01 grains/DSCF Dioxin/Furan 1.05E-10 wt%			
45	AP-42	PM/PM10: 0.01 grains/ft3			PM/PM10: 7000 grain/lb  H2S: 379.5 scf/lbmol  2.5 ppmv (50% of meter)

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
					Airflow: 12,640 ACFM
48	Vendor-supplied Grain loading factor	Grain loading factor = 0.0028 grain/Dry CSF PM: 0.0028 grains/ft3	Baghouse	99.9%	Blow Capacity: 300,000 ft3/hr 8760 hours/yr 1/7000 lb/grains  Air flow: 50,000 ACFM  H2S: 2.5 ppmv Chlorine: 0.2 ppmv (50% of the meter) 379.5scf/lbmol
49	AP-42, Tier 3 Emission Factor	PM:0.087 g/HP-hr PM10:0.22 g/HP-hr SOX:2.05E-03 lb/HP-hr VOC: 0.06 g/HP-hr CO: 0.92 g/HP-hr NOX: 2.7 g/HP-hr			687 HP BSFC = 7000 Btu/HP-hr 500 hr/yr
50, 51	AP-42, Manufacturer's Datasheet, Tier 2 Emission Limits	PM:0.04 g/HP-hr PM10:0.04 g/HP-hr SOX:5.88E-04 lb/HP-hr VOC: 0.45 g/HP-hr CO: 1.6 g/HP-hr NOX: 0.47 g/HP-hr	N/A	N/A	2820 HP 1020 btu/scf 18.12 MMBtu/hr 500 hours
52	AP-42, Chapter 3.2 Table 3.2-3	PM:9.91E-03 lb/MMBtu PM10:991E-03 lb/MMBtu SOX:5.88E-04 lb/MMBtu VOC: 1.0 g/HP-hr CO: 4.0 g/HP-hr NOX: 2.0 g/HP-hr	N/A	N/A	1135 HP 10.32 MMBtu/hr 500 hours
53	AP-42, Manufacturer's Datasheet, Tier 2 Emission Limits	PM:7.71E-05 g/HP-hr PM10:7.71E-05 g/HP-hr SOX:5.88E-04 lb/HP-hr VOC: 0.85 g/HP-hr CO: 0.95 g/HP-hr	N/A	N/A	163 HP 1020 Btu/scf 1.01 MMBtu/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		NOX: 1.17 g/HP-hr			
54, 55, 56	AP-42, 11.12.2 EF for pneumatic loading of cement elevated	PM: 0.73 lb/ton PM10: 0.47 lb/ton	Filter vent	99%	Hourly Tons Processed: 25 ton/hr SN-54, 55 # of Drops: 2 SN-56 # of Drops: 3
57A, 57B	Tier 4 AP-42 3.3	PM: 3.29E-05 PM10: 3.29E-05 SOX: 2.05E-03 VOC: 2.51E-03 CO: 8.22E-03 NOX: 6.58E-04			Engine Size * EmF 111 HP 500 hr/yr  Brake-Specific Fuel Consumption (BSFC): 7000 btu/hp-hr
58	Tank Specs	Tank P: 1.3 psig Flow: 27 ft <sup>3</sup> /min Mass: 64.1 lb/lbmol SO <sub>2</sub> Volume: 379.5 ft <sup>3</sup> /lbmol	Scrubber at SN-40	99%	Tank fill rate: 200 gpm  40 wt% NaHSO <sub>3</sub>  Assume partial pressure of SO <sub>2</sub> will comprise the entire pressure from the tank liquid as worst case  Conservative use of 100% downtime as worst-case scenario P <sub>tank</sub> =0.23 psig Outbreathing flow: 4.5 ft <sup>3</sup> /min

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
19	EEE	EEE See Plantwide		

SN	Pollutants	Test Method	Test Interval	Justification
	SO <sub>2</sub>	6C		
	Average VOHAP concentration for off-site material streams	Sampling, Method 305 in 40 CFR part 63, Method 25D in 40 CFR part 60, Method 624 in 40 CFR part 136, Method 625 in 40 CFR part 136, Method 1624 in 40 CFR part 136, Method 1625 in 40 CFR part 136, Method 8260 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846, Third Edition, September 1986, as amended by Update I, November 15, 1992, or Method 8270 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846, Third Edition, September 1986, as amended by Update I, November 15, 1992		

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)
19	Various AFS systems	CEM	Continuous	N
	CO Concentration	CEM	Continuous	N
	PM Concentration	COM	Continuous	N
	NO <sub>x</sub> Concentration	CEM	Continuous	N
	SO <sub>2</sub> Concentration	CEM	Continuous	N
32, 45, 48	H2S Concentration	ppm meter	Continuous	N
40	Various AFS systems	CEM	Continuous	N
	CO Concentration	CEM	Continuous	N
	PM Concentration	COM	Continuous	N
	NO <sub>x</sub> Concentration	CEM	Continuous	N
	SO <sub>2</sub> Concentration	CEM	Continuous	N
41	Outlet and Inlet Temp of RTO	CEM	Continuous	N
	HCl concentration	CEM	Continuous	N
	HF concentration	CEM	Continuous	N
48	PM Concentration	COM	Continuous	N

## 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)
19	Kiln Feed Rate	30 tons/hr on a 1 hour rolling average each	Monthly	N
32	H <sub>2</sub> S concentration	2.5 ppm	continuous	N
33	Maintenance/Malfunction	N/A	Monthly	N
33	Hours of Operation	1,000 Hours per year	Monthly	N
34, 35	Compliance with Subpart VVa	Within 180 days of initial start up	Per new equipment	N
	Calibration drift assessment	Negative drift above 10%	End of each monitoring day	N
	Pressure Relief Devices In Gas/Vapor Service	Each pressure relief device with no detectable emissions / 500 ppm above background	No later than 5 calendar days after the pressure release	N
		A new rupture disk shall be installed after each pressure release	No later than 5 calendar days after pressure release	N
	Standards for Valves in Gas/Vapor or Light Liquid Service	A new valve must be monitored	Within 30 days after the end of the first start up period	N
		A valve for which a leak is not detected for 2 successive months	Quarterly monitoring	(CEDRI)
		A valve for which a leak is detected	Monthly monitoring	(CEDRI)
		Repair of detected leaks	Within 15 calendar days after the leak is detected	(CEDRI)
	Standards for Pumps/Valves/Connectors in Heavy Liquid Service	Repair of detected leaks	Within 15 calendar days after the leak is detected	(CEDRI)
	Requirements of 60.486a	Instrument identification, operator identification, equipment identification, date of monitoring, instrument reading	Each monitoring event	(CEDRI)
	Requirements of 40 CFR 60.482-1a to 11a	Equipment with detected leaks must be marked until no leaks for 2 successive months, repaired	each leak event	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		equipment after it has been repaired	Kept per event for 2 years	
		A detected leak log for each event must contain: the instrument and operator identification number (except for pumps), the date of the leak and each repair, repair methods applied, maximum instrument reading measured by Method 21, repair delayed and the reason, the signature of the permittee whose decision it was that the repair needed a process shutdown, the expected date of successful repair of the leak if a leak is not repaired within 15 calendar days, dates of process unit shutdowns that occur while the equipment is unrepaired, and the date of a successful repair of a leak		N
		A log for all equipment subject to 60.482 shall contain: a list of identification numbers for equipment subject, dates and compliance test data as per 40 CFR 60.486a		N
35	Throughput	47,240,209 gal/yr	Monthly	N
	Compliance with Subpart VVb	Within 180 days of initial start up	Per new equipment	N
	Calibration drift assessment	Negative drift above 10%	End of each monitoring day	N
	Pressure Relief Devices In Gas/Vapor Service	Each pressure relief device with no detectable emissions / 500 ppm above background	No later than 5 calendar days after the pressure release	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		A new rupture disk shall be installed after each pressure release	No later than 5 calendar days after pressure release	N
	Standards for Valves in Gas/Vapor or Light Liquid Service	A new valve must be monitored	Within 30 days after the end of the first start up period	N
		A valve for which a leak is not detected for 2 successive months	Quarterly monitoring	(CEDRI)
		A valve for which a leak is detected	Monthly monitoring	(CEDRI)
		Repair of detected leaks	Within 15 calendar days after the leak is detected	(CEDRI)
	Standards for Pumps/Valves/Connectors in Heavy Liquid Service	Repair of detected leaks	Within 15 calendar days after the leak is detected	(CEDRI)
	Requirements of 60.486b	Instrument identification, operator identification, equipment identification, date of monitoring, instrument reading	Each monitoring event	(CEDRI)
	Requirements of 40 CFR 60.482-1b to 11b	Equipment with detected leaks must be marked until no leaks for 2 successive months, repaired equipment after it has been repaired	each leak event	N
		A detected leak log for each event must contain: the instrument and operator identification number (except for pumps), the date of the leak and each repair, repair methods applied, maximum instrument reading measured by Method 21, repair delayed and the reason, the signature of the permittee whose decision it was that the repair needed a process shutdown, the expected date of successful repair of	Kept per event for 2 years	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		the leak if a leak is not repaired within 15 calendar days, dates of process unit shutdowns that occur while the equipment is unrepaired, and the date of a successful repair of a leak		
		A log for all equipment subject to 60.482 shall contain: a list of identification numbers for equipment subject, dates and compliance test data as per 40 CFR 60.486a		N
36	Throughput	200,000 tons/yr	Monthly	N
37	Items in §61.356	1.1 ton/yr or 11 ton/yr Benzene in waste stream	As needed	N
41	Visual inspection of all fixed-roof enclosures with closed-vent systems for gaps and cracks in roof, seals, and access doors	Repairs within 45 calendar days after identification	Inspected initial and quarterly thereafter	N
	Visual inspection of each closed-vent system and control device	First effort repairs within 5 calendar days after detection, completed repairs no later than 15 days after detection	Inspected initially and quarterly thereafter	N
	Inspection of data recorded by monitoring equipment	Manufacturer's specs	Daily	N
	DE of RTO	98%	Initial and every 5 years	Y
	Temperature Monitoring System Accuracy	Minimum outlet not less than 1400°F	Monthly reports until CEMS is operational, And thereafter verified twice a year by testing	Y
	Inspection/maintenance program of the RTO	By manufacturer's specs	By manufacturer's specs	N
42	Throughput	29,400 tons/yr	Monthly	N
43	Throughput	9,000 tons/yr	Monthly	N
49	Hours of Operation	500 Hours per year	Monthly	N
50, 51, 52, 53	Hours of Operation	500 Hours per year	Monthly	N
54	Tons Processed	125 tons/yr	Monthly	N
55		1800 tons/yr		

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
56		5880 tons/yr		
57A, 57B	Hours of Operation	500 hours/yr	Monthly	N
58	Sodium bisulfite content	wt % of sodium bisulfite filling into the tank and safety data sheet	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
32, 38, 49, 50, 51, 52, 53, 54, 55, 56, 57A, 57B	5%	§18.501	Inspector Observation
48	5%	CAM	Daily
01, 05, 06, 09, 10, 11, 18, 20, 21, 22, 26, 27	7%	CAM	Weekly
07, 08, 12, 13, 14, 15, 16, 23, 24, 25, 39	10%	CAM	Weekly
19 and 40	20%	Guidance	Continuous
33	20%	Guidance	Inspector Observation
41	5%	Guidance	Weekly

20. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

## 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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Five Diesel Fuel Storage Tanks 4000, 200, 200, 2500, 2000, and 1000 gallon capacity	3			0.002				
Diesel Fuel Storage Tank (849 gal)	3			2.24E-04				
Laboratory Dust Collector and Vent	5	0.0001		0.22			0.22	0.22
Lime Handling Fugitives (SN- 29)	13	0.003						
Cooling Tower (300 gpm)	13	PM=0.22 PM <sub>10</sub> =0.03						
Cooling Tower (7500 gpm)	13	PM=0.23 PM <sub>10</sub> =0.03						
Cooler Conveyor Dust Collector	13	0.0001						
Leachate Tanks	13			0.0001				
Loading Silos	13	PM= 0.19 PM <sub>10</sub> =0.09						
Air Duct Systems	13	0.0001						
Initial Size Reduction System	13	0.0001						
Loadout Inline Dust Collector (SN-31)	13	0.08					2.97E-05	7.61E-05
Hot Water Heater #1	13	0.01	0.01	0.01	0.1	0.12	2.09E-03	2.18E-03
Hot Water Heater #2	13	0.01	0.01	0.01	0.1	0.12	2.09E-03	2.18E-03
Drum Sampling	13			0.7			0.7	0.7
Aluminum Oxide Tank w/BV	13	0.033						
Activated Carbon Tank w/BV	13	0.003						
Reagent #1 Tank (32.5% Urea solution)	13			0.15				
Bulk Solid Railcar Unloading	13	0.1		0.1			0.1	0.1
Fourteen Carbon Drums at Loading Bays				*				
<b>Total</b>		<b>0.4594</b>	<b>0.02</b>	<b>1.1923</b>	<b>0.2</b>	<b>0.24</b>	<b>1.024211</b>	<b>1.0244</b>

Permit #: 1016-AOP-R21

AFIN: 10-00004

Page 20 of 20

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 #
1016-AOP-R20

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Elemental Environmental Solutions LLC  
 Permit Number: 1016-AOP-R21  
 AFIN: 10-00004

\$/ton factor	28.14	Annual Chargeable Emissions (tpy)	804.34235
Permit Type	Minor Mod	Permit Fee \$	500

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	3.7
Initial Title V Permit Fee Chargeable Emissions (tpy)	

*HAPs not included in VOC or PM:*

*Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

*Air Contaminants:*

*All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		72.5	73.1	0.6	0.6	73.1
PM <sub>10</sub>		71.9	72.3	0.4		
PM <sub>2.5</sub>				0		
SO <sub>2</sub>		242.3	245.4	3.1	3.1	245.4
VOC		39.9	39.9	0	0	39.9
CO		112.1	114.4	2.3		
NO <sub>x</sub>		225.8	225.8	0	0	225.8
Lead	<input checked="" type="checkbox"/>	0.212	0.212	0	0	0.212

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Arsenic Compounds	<input checked="" type="checkbox"/>	0.09	0.09	0	0	0.09
Beryllium Compounds	<input checked="" type="checkbox"/>	0.09	0.09	0	0	0.09
Cadmium Compounds	<input checked="" type="checkbox"/>	0.22	0.22	0	0	0.22
Chlorine	<input checked="" type="checkbox"/>	41.15	41.15	0	0	41.15
Hydrochloric Acid	<input checked="" type="checkbox"/>	52.2	52.2	0	0	52.2
Hexachlorobenzene	<input checked="" type="checkbox"/>	1.49	1.49	0	0	1.49
Hexachlorobutadiene	<input checked="" type="checkbox"/>	9.83E+00	9.83E+00	0	0	9.83
Chromium Compounds	<input checked="" type="checkbox"/>	0.09	0.09	0	0	0.09
Dioxin and Furans	<input checked="" type="checkbox"/>	0.00000035	0.00000035	0	0	3.5E-07
Fluoride Compounds	<input checked="" type="checkbox"/>	6.49	6.49	0	0	6.49
Hydrogen Fluoride	<input checked="" type="checkbox"/>	9.9	9.9	0	0	9.9
Manganese Compounds	<input checked="" type="checkbox"/>	0.09	0.09	0	0	0.09
Mercury	<input checked="" type="checkbox"/>	0.12	0.12	0	0	0.12
Nickel Compounds	<input checked="" type="checkbox"/>	0.09	0.09	0	0	0.09
Polycyclic Aromatic Hydrocarbons**	<input type="checkbox"/>	2.99	2.99	0		
Bromine	<input checked="" type="checkbox"/>	11.61	11.61	0	0	11.61
Selenium Compounds	<input checked="" type="checkbox"/>	0.21	0.21	0	0	0.21
Total Other HAPs	<input type="checkbox"/>	6.66E+01	6.66E+01	0		
Benzene	<input checked="" type="checkbox"/>	10.09	10.09	0	0	10.09
Cyanide	<input checked="" type="checkbox"/>	0.00035	0.00035	0	0	0.00035
Ammonia	<input checked="" type="checkbox"/>	70.11	70.11	0	0	70.11
H <sub>2</sub> S	<input checked="" type="checkbox"/>	6.06	6.06	0	0	6.06