

# STATEMENT OF BASIS

Mineral Manufacturing Corporation  
Eufaula, Alabama  
Barbour County  
Facility No. 601-0013

This proposed renewal to the Title V Major Source Operating Permit is issued under the provisions of ADEM Admin. Code r. 335-3-16. Mineral Manufacturing Corporation (hereinafter “MMC”) has applied to renew the existing Title V Major Source Operating Permit, which was issued on November 30, 2016. The applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans, and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management (ADEM), in accordance with the terms and conditions of this permit.

## BACKGROUND

MMC was initially issued a Title V Major Source Operating Permit on October 21, 2011. Per ADEM Rule 335-3-16-.12(2), an application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of the permit. Based on this rule, the application for renewal was due to the Department no later than May 29, 2021, but no earlier than May 29, 2020. A complete application for permit renewal was received by the Department on May 28, 2021.

## FACILITY DESCRIPTION

MMC receives shipments of bauxitic clay and kaolin minerals (hereinafter “minerals”) that require crushing and calcining to achieve a marketable product for consumers.

The following is a description of the plant process:

**(Unit 001 – 20 TPH Kiln/Cooler, Crushing, and Conveying)** - Raw minerals are shipped to MMC by truck and stockpiled in one of two enclosed storage buildings prior to processing. In one storage building, the raw minerals are transferred by front-end loader into a feed hopper. From the feed hopper, the minerals are transferred via an apron feed conveyor to a double roll crusher for size reduction. The reduced minerals are then transferred via a belt conveyor to a saw-toothed crusher for further reduction. Exiting the crusher, the reduced minerals enter a second hopper to await transfer to another apron feed conveyor. The apron feed conveyor, which is equipped with variable speed control, then transfers the reduced minerals to a belt conveyor that feeds an 8’ x 200’ rotary kiln with a heat capacity of 40 MMBtu/hr and fueled by natural gas only. The minerals are calcined in the rotary kiln at a temperature above 2000°F to remove free moisture. After exiting the kiln, the minerals then enter a 6’ x 61’ rotary cooler for heat recovery. To complete the process, the calcined minerals are transported from the cooler via two subsequent belt conveyors and stored in an enclosed storage building.

All aforementioned process equipment, excluding the last belt conveyor, are ducted into a reverse, pulse type dust collector consisting of a series of four smaller baghouses that work in unison. There is one stack affiliated with this control device. The collection device has a designed removal efficiency of greater than 99%. The last belt conveyor is located in an enclosed storage building and does not have a control device. Therefore, all emissions from the conveyor are fugitive.

**(Unit 002 – 200 TPH Conveying, Crushing, and Extruding)** - In the second storage building, raw minerals are transferred by front-end loader into a feed hopper. From the feed hopper, the minerals are conveyed to a primary crusher. The crushed material would be conveyed to a disintegrator for further reduction, followed by a conveyor to a smooth-roll crusher. The clay material would then be conveyed to a pre-pugmill sealer, before being conveyed to a pugmill extruder. This high moisture-content homogenized pellet product is fed to the kiln/cooler process (Unit 001) via front end loader.

**(Unit 003 – 25 TPH Conveying, Crushing, Screening, and Sacking)** - Once the calcined material is transported to the final storage building, it is fed to a conveyor, then to a crusher. The material then enters an elevator, where product is transported to a screen for sizing. The four levels of the screen each correspond to a 10 ton bin, where finished product is subsequently bagged in 2-ton bulk sacks. The crusher, elevator, screen and baggers are controlled by a baghouse.

### MISCELLANEOUS UNITS

There is a 58 Hp diesel-fired emergency engine and a 676 Hp diesel-fired emergency engine which rotate the kiln during periods of electrical interruption to the facility.

### APPLICABILITY

MMC is subject to the following regulations:

State Implementation Plan (SIP)	ADEM Admin. Code r. 335-3-4-.01 ( <i>Opacity</i> ) ADEM Admin. Code r. 334-3-4-.01 ( <i>Particulate Matter</i> )
New Source Performance Standards (NSPS)	40 CFR Part 60, Subpart OOO ( <i>Standards of Performance for Nonmetallic Mineral Processing Plants</i> )
Major Source Operating Permits (Title V)	ADEM Admin. Code r. 335-3-16
National Emission Standards for Hazardous Air Pollutants (NESHAP)	40 CFR 63, Subpart ZZZZ ( <i>NESHAP for Stationary Reciprocating Internal Combustion Engines</i> )

Unit specific regulations are detailed under the section “Unit Descriptions and Potential Emissions” of this analysis.

MMC would not be subject to the following subparts of the New Source Performance Standards (NSPS):

1. Subpart LL (Standards of Performance for Metallic Mineral Processing Plants) - This subpart would not apply to MMC because the proposed process would not meet the definition of *metallic mineral processing plant*.

2. Subpart UUU (Standards of Performance for Calciners and Dryers in Mineral Industries) – This subpart would not apply to MMC because the rotary kiln commenced construction, modification, or reconstruction prior to applicability date of April 23, 1986.
3. Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) – This subpart would not apply to MMC because the emergency engines were manufactured prior to applicability date of April 1, 2006.
4. Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) – This subpart would not apply to MMC because the emergency engines were manufactured prior to applicability date of January 1, 2009.

Based on the Title V application, MMC has the potential to exceed the Prevention of Significant Deterioration (PSD) threshold of 250 TPY for SO<sub>2</sub> and NO<sub>x</sub>. However, according to ADEM Admin. Code r. 335-3-14-.04(2)(n), MMC would be considered grandfathered/exempt from PSD regulations based on the Major Source baseline dates of January 6, 1975, for SO<sub>2</sub>, and February 8, 1988, for NO<sub>x</sub>. Any future increases of emissions at MMC must be evaluated for PSD applicability if the emissions exceed the significant levels listed in ADEM Admin. Code 334-3-14-.04(2)(w).

According to the Title V application, MMC is subject to Compliance Assurance Monitoring (CAM) regulations. The rotary kiln at this facility meets the criteria for CAM applicability. It is subject to a PM emission limit, has a baghouse to control PM emissions, and has a potential to exceed major source thresholds for PM prior to the control device.

### **EMISSIONS STANDARDS AND POTENTIAL EMISSIONS**

#### **Unit 001 - 20 TPH Rotary Kiln/Cooler, Crushing and Conveying Circuit**

This unit is subject to the following SIP rules and regulations:

##### *Emissions Standards*

##### *Opacity:*

###### **ADEM Admin. Code r. 335-3-4-.01**

- Opacity is limited to 20%, as determined by a six-minute average.
- During one six-minute period in any sixty minute period, a source of emission may discharge into the atmosphere particulate of an opacity not greater than 40%.

##### *Particulate Matter:*

###### **ADEM Admin. Code r. 335-3-4-.04**

- $E = 3.59 P^{0.62}$ ; ( $P < 30$  tons/hr)  
where E = emissions in pounds per hour

P = process weight per hour in tons per hour

This calculates to an allowable of 23.00 lbs/hr or 100.74 TPY.

Potential Emissions

Two types of minerals are processed at MMC, bauxitic clay and kaolin minerals. Both minerals vary in potential emissions for SO<sub>2</sub>, NO<sub>x</sub>, VOC, and CO.

Please see the potential emissions for each mineral listed in the tables below.

Bauxitic Clay Processing:

Pollutant	Potential (lbs/hr)	Potential (TPY)	Basis of Calculation	Allowable Emission Rate
PM	23.00	100.74	335-3-4-.04(1)	23.00 lbs/hr
SO <sub>2</sub>	193.24	846	Stack Test	N/A
NO <sub>x</sub>	126.14	553	Stack Test	N/A
VOC	0.29	1.27	Stack Test	N/A
CO	1.68	7.36	Stack Test	N/A
HAPs	0.07	0.31	AP-42	N/A
GHG (CO <sub>2</sub> e)	4,735	20,739	AP-42	N/A

Kaolin/Clay Processing:

Pollutant	Potential (lbs/hr)	Potential (TPY)	Basis of Calculation	Allowable Emission Rate
PM	23.00	100.74	335-3-4-.04(1)	23.00 lbs/hr
SO <sub>2</sub>	37.44	163.98	Stack Test*	N/A
NO <sub>x</sub>	120.12	526.12	Stack Test*	N/A
VOC	27.31	119.66	Stack Test*	N/A
CO	5.00	21.90	Stack Test*	N/A
HAPs	9.2	40.3	AP-42	N/A
GHG (CO <sub>2</sub> e)	15,628.8	68,454.2	AP-42	N/A

\* Stack testing results used from a comparable facility.

**Unit 002 - 200 TPH Conveying, Crushing and Extruding Circuit**

All of the equipment utilized in this process, except the pug-sealer and pug extruder are subject to NSPS Subpart OOO regulations, with an allowable emission rate of 0.032 g/dscm. Since most of the equipment is located inside an enclosed building, emissions from any building vents must meet the applicable stack emission limits of 0.032 g/dscm. In addition, the crusher is subject to a 12% opacity standard and transfer points on conveyors, belt conveyors, and screens are subject to a 7% opacity standard. Fugitive emissions from building openings must not exceed 7% opacity.

Pollutant	Potential (lbs/hr)	Potential (TPY)	Basis of Calculation	Allowable Emission Rate
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PM	2.24	9.8	AP-42	0.032 g/dscm
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**Unit 003 - 25 TPH Conveying, Crushing, Screening and Sacking Circuit**

All of the equipment utilized in this process are subject to NSPS Subpart OOO regulations, with an allowable emission rate of 0.05 g/dscm. This circuit is controlled by a baghouse that is subject to a 7% opacity standard. All equipment in this circuit was manufactured prior to April 22, 2008. This circuit was previously permitted, but has not been in production for several years; therefore, it was not in the original Title V permit.

Pollutant	Potential (lbs/hr)	Potential (TPY)	Basis of Calculation	Allowable Emission Rate
PM	0.36	1.6	AP-42	0.05 g/dscm

**PERIODIC MONITORING AND RECORDKEEPING REQUIREMENTS**

- MMC personnel, who are certified to determine opacity, shall perform weekly visible emissions observations on the 001 baghouse stack while unit is in operation. Each observation shall be accomplished for a minimum of six-minutes. If the average Method 9 opacity during the six-minute period exceeds 15%, MMC shall conduct a second Method 9 test within thirty (30) minutes of the initial observation. If the average opacity during both six-minute observations exceeds 15%, MMC shall conduct an inspection of the applicable control device to determine the cause of the visible emissions. MMC shall notify the Department in writing within twenty-four (24) hours if the visible emissions are at or above 20% opacity during a Method 9 six-minute observation. Both Method 9 six-minute observations shall be submitted if notification is required.

The notification shall include the following:

- 1) The duration of the occurrence
  - 2) The results of the inspection of the control device
  - 3) The corrective action taken and/or preventative measures adopted
- Periodic emissions monitoring will consist of maintaining and utilizing a pressure differential measuring device on the baghouse. The pressure range should measure a pressure drop between 3 and 7 inches of water. MMC shall conduct daily monitoring and recording of the pressure drop across the baghouse while the unit is in operation. If problems are identified, corrective action shall be initiated within 24 hours.
  - MMC shall conduct monthly inspections of all hoppers, fans, hoods, ductwork, and cleaning cycles, as well as, all bags inside the baghouse to ensure proper operation. If problems are identified, corrective action should be initiated within 24 hours.
  - MMC shall be required to have personnel (whether staff or contractor) readily available who are certified to conduct EPA Reference Method 9 visible emissions observations and who are knowledgeable in the maintenance of emissions control equipment.

- Since MMC is subject to 40 CFR Part 64, Compliance Assurance Monitoring for PM emissions, monitoring shall be conducted in accordance with the attached Compliance Assurance Monitoring located within the permit.

**REPORTING REQUIREMENTS**

In the event of deviations from permit requirements, MMC shall report to the Air Division of ADEM within 24 hours of the occurrence. The report shall include information regarding the probable cause of the deviation(s) and any corrective actions or preventative measures that were implemented. MMC is also required to submit an annual compliance certification and a semi-annual compliance report.

An Environmental Justice (EJ) Screen has been run for this facility and is included in this analysis. This draft permit will be subject to a 30-day public comment period and 45-day EPA review prior to issuance.

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*Delilah D. Simpson*  
Energy Branch  
Air Division

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Date

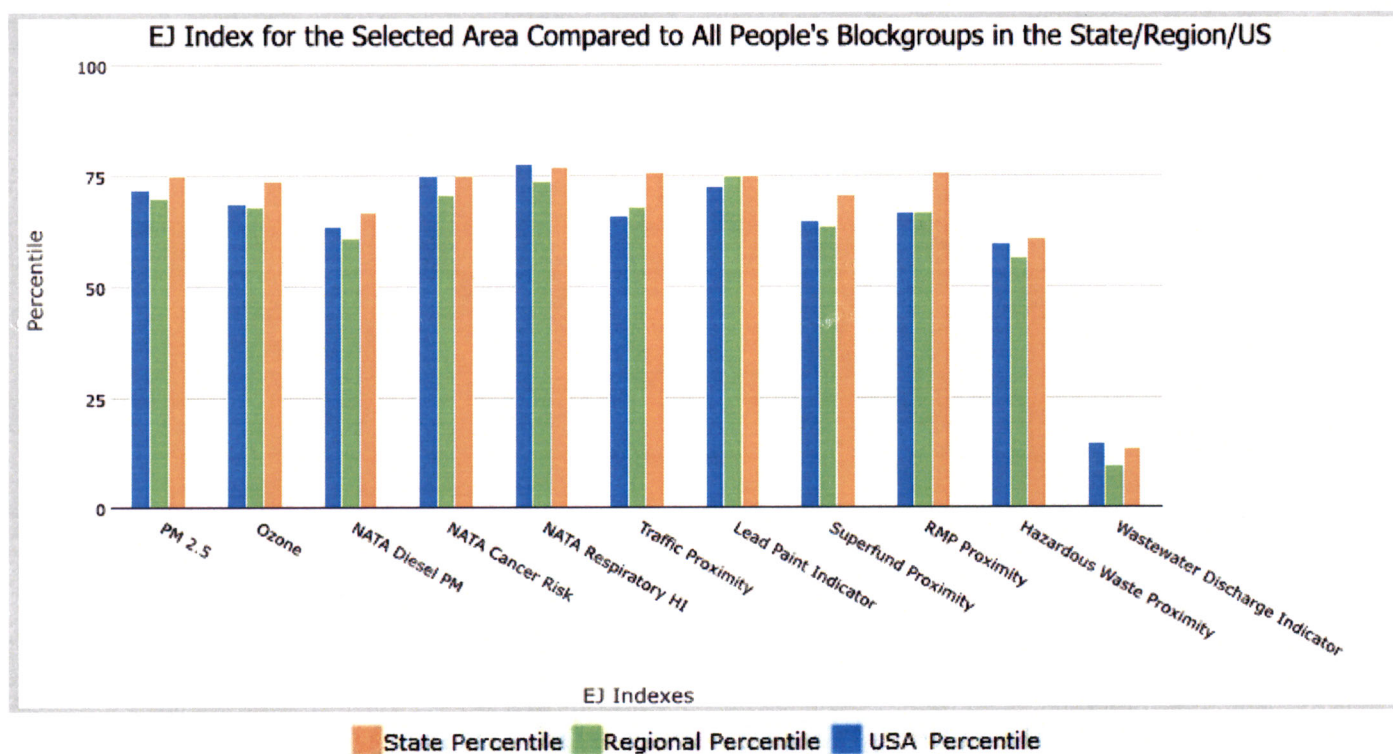
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1 mile Ring Centered at 31.817918,-85.193911, ALABAMA, EPA Region 4

Approximate Population: 380

Input Area (sq. miles): 3.14

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	75	70	72
EJ Index for Ozone	74	68	69
EJ Index for NATA* Diesel PM	67	61	64
EJ Index for NATA* Air Toxics Cancer Risk	75	71	75
EJ Index for NATA* Respiratory Hazard Index	77	74	78
EJ Index for Traffic Proximity and Volume	76	68	66
EJ Index for Lead Paint Indicator	75	75	73
EJ Index for Superfund Proximity	71	64	65
EJ Index for RMP Proximity	76	67	67
EJ Index for Hazardous Waste Proximity	61	57	60
EJ Index for Wastewater Discharge Indicator	14	10	15



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1 mile Ring Centered at 31.817918,-85.193911, ALABAMA, EPA Region 4

Approximate Population: 380

Input Area (sq. miles): 3.14



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0



## EJSCREEN Report (Version 2020)



1 mile Ring Centered at 31.817918,-85.193911, ALABAMA, EPA Region 4

Approximate Population: 380

Input Area (sq. miles): 3.14

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	9.54	9.31	65	8.57	89	8.55	82
Ozone (ppb)	34.7	38	10	38	27	42.9	9
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.122	0.346	0	0.417	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	45	43	57	36	90-95th	32	90-95th
NATA* Respiratory Hazard Index	0.78	0.65	88	0.52	95-100th	0.44	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	57	220	45	350	37	750	26
Lead Paint Indicator (% Pre-1960 Housing)	0.18	0.18	66	0.15	72	0.28	50
Superfund Proximity (site count/km distance)	0.019	0.054	24	0.083	29	0.13	16
RMP Proximity (facility count/km distance)	0.24	0.41	62	0.6	50	0.74	43
Hazardous Waste Proximity (facility count/km distance)	0.025	0.82	0	0.91	0	5	1
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.016	1.2	81	0.65	88	9.4	82
<b>Demographic Indicators</b>							
Demographic Index	45%	36%	71	37%	67	36%	69
People of Color Population	40%	34%	67	39%	59	39%	58
Low Income Population	50%	38%	72	36%	74	33%	79
Linguistically Isolated Population	3%	1%	85	3%	68	4%	61
Population With Less Than High School Education	23%	14%	79	13%	83	13%	83
Population Under 5 years of age	6%	6%	58	6%	59	6%	56
Population over 64 years of age	20%	16%	73	17%	72	15%	75

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

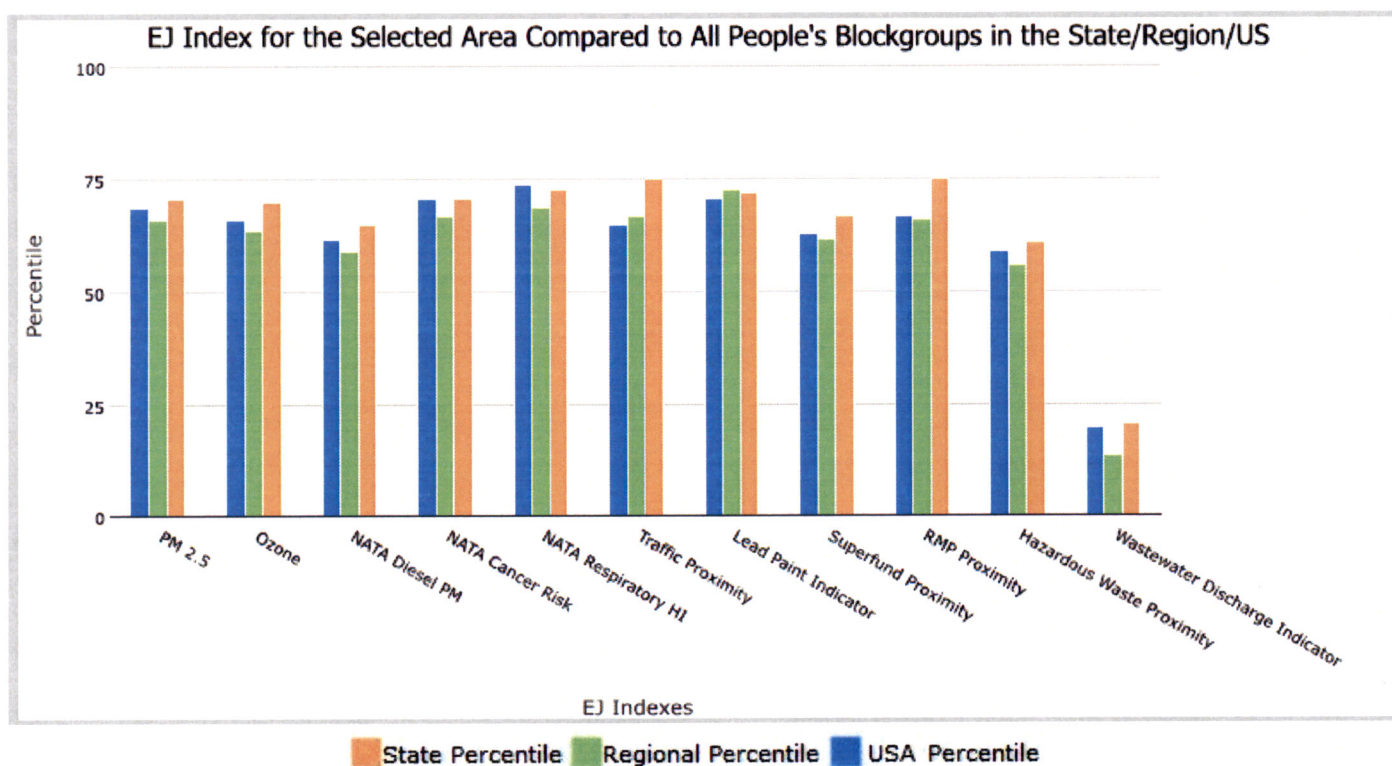
EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

3 miles Ring Centered at 31.817918,-85.193911, ALABAMA, EPA Region 4

Approximate Population: 2,924

Input Area (sq. miles): 28.27

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	71	66	69
EJ Index for Ozone	70	64	66
EJ Index for NATA* Diesel PM	65	59	62
EJ Index for NATA* Air Toxics Cancer Risk	71	67	71
EJ Index for NATA* Respiratory Hazard Index	73	69	74
EJ Index for Traffic Proximity and Volume	75	67	65
EJ Index for Lead Paint Indicator	72	73	71
EJ Index for Superfund Proximity	67	62	63
EJ Index for RMP Proximity	75	66	67
EJ Index for Hazardous Waste Proximity	61	56	59
EJ Index for Wastewater Discharge Indicator	21	14	20



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**3 miles Ring Centered at 31.817918,-85.193911, ALABAMA, EPA Region 4**

**Approximate Population: 2,924**

**Input Area (sq. miles): 28.27**



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

## EJSCREEN Report (Version 2020)



3 miles Ring Centered at 31.817918,-85.193911, ALABAMA, EPA Region 4

Approximate Population: 2,924

Input Area (sq. miles): 28.27

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	9.58	9.31	66	8.57	89	8.55	83
Ozone (ppb)	34.8	38	11	38	28	42.9	10
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.157	0.346	9	0.417	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	45	43	59	36	90-95th	32	90-95th
NATA* Respiratory Hazard Index	0.79	0.65	89	0.52	95-100th	0.44	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	120	220	61	350	51	750	38
Lead Paint Indicator (% Pre-1960 Housing)	0.13	0.18	53	0.15	62	0.28	43
Superfund Proximity (site count/km distance)	0.018	0.054	22	0.083	27	0.13	15
RMP Proximity (facility count/km distance)	0.45	0.41	75	0.6	64	0.74	57
Hazardous Waste Proximity (facility count/km distance)	0.026	0.82	0	0.91	0	5	1
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0066	1.2	75	0.65	84	9.4	77
<b>Demographic Indicators</b>							
Demographic Index	42%	36%	68	37%	64	36%	66
People of Color Population	38%	34%	65	39%	56	39%	57
Low Income Population	47%	38%	68	36%	70	33%	76
Linguistically Isolated Population	2%	1%	84	3%	67	4%	60
Population With Less Than High School Education	22%	14%	77	13%	81	13%	81
Population Under 5 years of age	5%	6%	42	6%	43	6%	40
Population over 64 years of age	18%	16%	66	17%	68	15%	70

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

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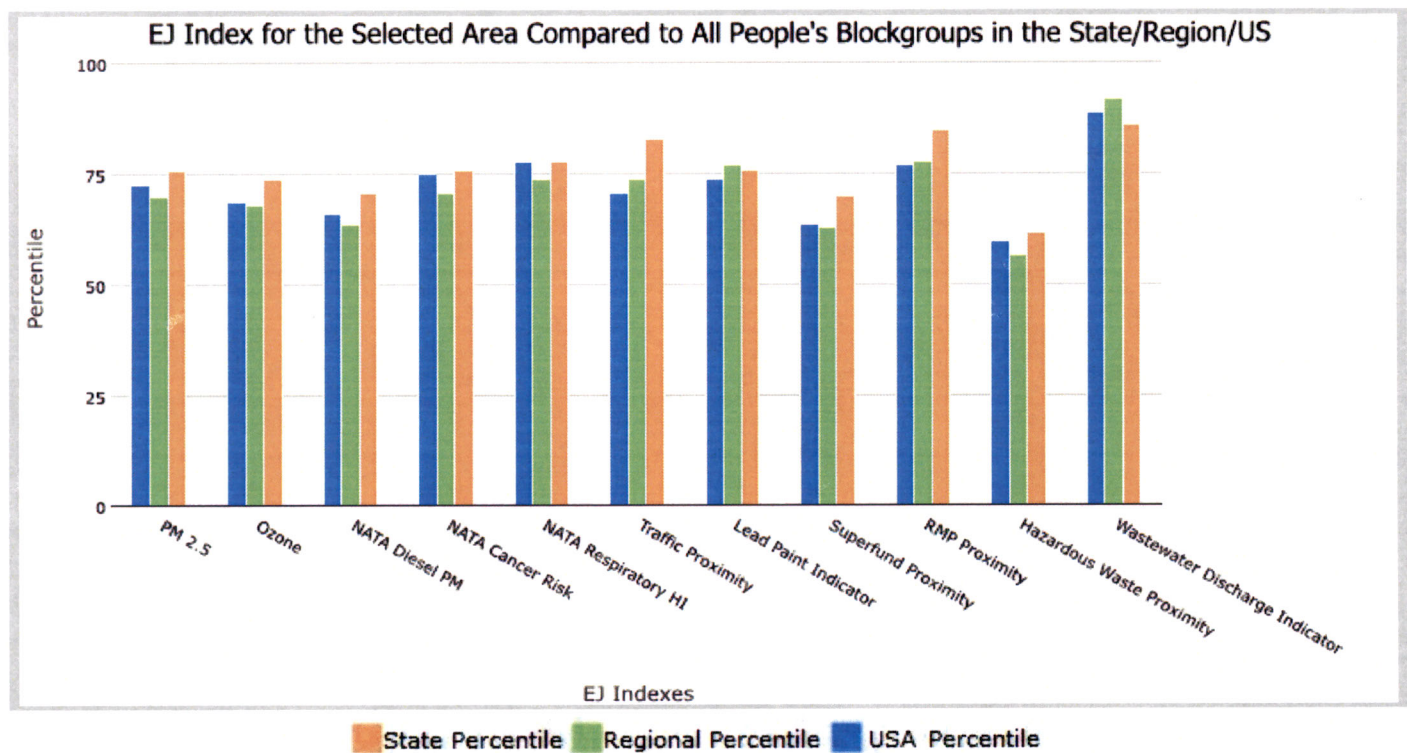
5 miles Ring Centered at 31.817945,-85.193878, ALABAMA, EPA Region 4

Approximate Population: 7,160

Input Area (sq. miles): 78.53

Mineral Manufacturing Corporation

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	76	70	73
EJ Index for Ozone	74	68	69
EJ Index for NATA* Diesel PM	71	64	66
EJ Index for NATA* Air Toxics Cancer Risk	76	71	75
EJ Index for NATA* Respiratory Hazard Index	78	74	78
EJ Index for Traffic Proximity and Volume	83	74	71
EJ Index for Lead Paint Indicator	76	77	74
EJ Index for Superfund Proximity	70	63	64
EJ Index for RMP Proximity	85	78	77
EJ Index for Hazardous Waste Proximity	62	57	60
EJ Index for Wastewater Discharge Indicator	86	92	89



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5 miles Ring Centered at 31.817945,-85.193878, ALABAMA, EPA Region 4

Approximate Population: 7,160

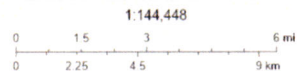
Input Area (sq. miles): 78.53

Mineral Manufacturing Corporation



August 9, 2021

✚ Mineral Manufacturing Corporation



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

## EJSCREEN Report (Version 2020)



5 miles Ring Centered at 31.817945,-85.193878, ALABAMA, EPA Region 4

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### Mineral Manufacturing Corporation

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	9.62	9.31	67	8.57	90	8.55	84
Ozone (ppb)	34.9	38	11	38	29	42.9	10
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.169	0.346	13	0.417	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	45	43	60	36	90-95th	32	90-95th
NATA* Respiratory Hazard Index	0.8	0.65	91	0.52	95-100th	0.44	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	160	220	68	350	57	750	43
Lead Paint Indicator (% Pre-1960 Housing)	0.13	0.18	53	0.15	63	0.28	43
Superfund Proximity (site count/km distance)	0.017	0.054	20	0.083	25	0.13	14
RMP Proximity (facility count/km distance)	0.54	0.41	78	0.6	68	0.74	61
Hazardous Waste Proximity (facility count/km distance)	0.026	0.82	0	0.91	0	5	1
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0081	1.2	77	0.65	85	9.4	78
<b>Demographic Indicators</b>							
Demographic Index	47%	36%	74	37%	70	36%	71
People of Color Population	45%	34%	70	39%	63	39%	62
Low Income Population	50%	38%	74	36%	75	33%	80
Linguistically Isolated Population	2%	1%	80	3%	61	4%	54
Population With Less Than High School Education	21%	14%	74	13%	78	13%	80
Population Under 5 years of age	5%	6%	43	6%	43	6%	41
Population over 64 years of age	19%	16%	67	17%	68	15%	71

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.