

STATEMENT OF BASIS

For the issuance of Air Permit # 0385-AOP-R12 AFIN: 35-00017

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Twin Rivers Pine Bluff LLC
1701 Jefferson Parkway
White Hall, Arkansas 71602

3. PERMIT WRITER:

Amanda Leamons

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Paper (except Newsprint) Mills
NAICS Code: 322121

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
9/1/2020	Modification	Changing PM/PM10 emissions of 01, 02, and 04 back to the limits in R10, using the calculation methods in NESHAP MM to calculate the particulate based on the max allowed under the bubbled limit.

6. REVIEWER'S NOTES:

With the renewal issued in 2018 the particulate limits at the lime kiln, recovery boiler, and smelt dissolving tank were calculating based on NCASI factors. Until this last renewal the emissions of particulate from those sources were based on the equations in NESHAP Subpart MM for calculating a bubble limit for particulate. The facility wanted the maximum flexibility afforded by Subpart MM; therefore, this modification is relaxing

the particulate limits and allowing the facility to revert to using the calculations in Subpart MM to limit particulate emissions for SN-01, SN-02, and SN-03. Also the five year PM testing requirements for SN-01 and SN-02 (SC 19 & 35) can now be fulfilled by the testing required under SC 262 which is the 5 year Subpart MM testing requirement.

7. COMPLIANCE STATUS:

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

The facility currently has an IA allowing them to operate at the PM/PM₁₀ levels allowed in this draft permit.

The most recent inspection was performed in September 2020, there were no areas of concern found in that inspection.

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? Y

- *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.

The changes to the permit do not qualify as a modification under PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	HAPs (Methanol)	Part 63 Subpart S (Cluster Rule)
SN-01, SN-02, SN-04	PM/HAPs	Part 63 Subpart MM (Cluster Rule)
SN-05 and SN-06	Filterable PM CO HCl Mercury	Part 63 Subpart DDDDD (Boiler MACT)
SN-57 & SN-60	HAPs	Part 63 Subpart ZZZZ (RICE MACT)
SN-60	PM, CO, NO _x , HC	Part 60, Subpart IIII

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 Regulation 18 requirement.)

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.

-Will complete with next renewal application.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency

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 ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants: *No changes in R12, this evaluation was completed for the renewal R11.*

The non-criteria pollutants listed below were evaluated. Based on Department 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 Department 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).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Acenaphthene	0.02	0.0022	0.000002	Yes
Acenaphthylene	0.02	0.0022	0.000005	Yes
Acetaldehyde	45	4.95	2.82	Yes
Acetone	1187	130.58	3.22	Yes
Acrolein	0.23	0.0253	0.1865	No
Ammonia	24.38	2.68	11.97	No
Anthracene	0.02	0.0022	0.000004	Yes
Arsenic	0.01	0.0011	0.001	Yes
Benz(a)anthracene	0.02	0.0022	2.0 E-6	Yes
Benzo(a)pyrene	0.02	0.0022	2.8 E-7	Yes
Benzo(b)fluoranthene	0.02	0.0022	2.4 E-7	Yes
Benzo(g,h,i)perylene	0.02	0.0022	5.9 E-7	Yes
Benzo(k)fluoranthene	0.02	0.0022	2.97 E-7	Yes
Beryllium	0.0005	0.00006	0.000035	Yes
Cadmium	0.01	0.0011	0.000825	Yes
Chromium +6	0.05	0.0055	0.000365	Yes
Chrysene	0.02	0.0022	4.97 E-7	Yes
Dibenzo(a,h)anthracene	0.02	0.0022	6.82 E-7	Yes
Fluorene	0.02	0.0022	0.00003	Yes

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Hydrogen chloride	2.98	0.3278	1.99	No
Hydrogen sulfide	1.394	0.153	0.59	No
Indeno(1,2,3-cd)pyrene	0.02	0.0022	5.19 E-7	Yes
Manganese	0.2	0.022	0.0238	No
Methanol	262	28.82	38.57	No
Mercury	0.1	0.011	0.00072	Yes
Phenanthrene	0.02	0.0022	4.0 E-6	Yes
Phosphorus	0.1	0.011	0.0372	No
Pyrene	0.02	0.0022	5.0 E-6	Yes
Sulfuric Acid	0.2	0.022	0.23	No

2nd 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 Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

All model results are based on the 1st 24-hr avg. high using 1 year of metdata from 2016, unless otherwise noted.

Pollutant	PAIL (µg/m ³) = 1/100 of TLV	Modeled Hourly Rate (lb/hr)	Modeled Concentration (µg/m ³)	Pass?
Acrolein	2.3	0.1865	1.90	Yes
Ammonia	243.8	11.97	4.86	Yes
Hydrogen chloride	29.8	1.99	0.54	Yes
Hydrogen sulfide	13.94	0.59	4.66	Yes
Manganese	2.0	0.5711	0.037	Yes
Methanol	2,620	38.57	623.59	Yes
Phosphorus	1.0	0.372	0.0392	Yes

Pollutant	PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of TLV	Modeled Hourly Rate (lb/hr)	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Sulfuric Acid	2.0	0.23	0.039	Yes

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: Limits for SN-01, SN-02, and SN-04 are set in Regulation 19 §19.804 and Table 19.8.1 – GFP (formerly Delta Natural Kraft) complies with the limits through CEMs and annual TRS testing.

15. CALCULATIONS:

SN	Emission Factor Source	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	NESHAP MM NCASI 1020 & 1050 CEMS	0.354 lb _{PM} /ton _{BLS} 0.354 lb _{PM10} /ton _{BLS} 0.07 lb _{SO2} /ton _{CaO} 0.05 lb _{VOC} /ton _{CaO} 0.18 lb _{CO} /ton _{CaO} 1.69 lb _{NOx} /ton _{CaO} 3.4 lb _{TRS} /hr	Scrubber	80%	See permit application for emission factor for other non-criteria pollutants.
02	NESHAP MM NCASI 1020 & 1050 Stack Test CO Study	0.86 lb _{PM} /ton _{BLS} 0.86 lb _{PM10} /ton _{BLS} 0.60 lb _{SO2} /ton _{BLS} 2.14 lb _{VOC} /ton _{BLS} 7,703.6 lb _{CO} /hr 1.33 lb _{NOx} /ton _{BLS} 35 lb _{TRS} /hr	Scrubber and Auxiliary Scrubber ESP	90% 98%	See permit application for emission factor for other non-criteria pollutants.
03	NCASI 1020 & 1050	0.156 lb _{PM} /ton _{CaO} 0.156 lb _{PM10} /ton _{CaO} 0.057 lb _{VOC} /ton _{CaO} 5.4e-4 lb _{TRS} /ton _{CaO}	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
04	NESHAP MM NCASI 884, 1020, & 1050	0.329 lb _{PM} /ton _{BLS} 0.329 lb _{PM10} /ton _{BLS} 0.015 lb _{SO2} /ton _{BLS} 0.066 lb _{VOC} /ton _{BLS} 0.008 lb _{CO} /ton _{BLS} 0.02 lb _{NOx} /ton _{BLS} 0.0118 lb _{H2S} /ton _{BLS}	Scrubber	99%	See permit application for emission factor for other non-criteria pollutants.

SN	Emission Factor Source	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		1.13e-3 lb _{DDS} /ton _{BLS} 4.93e-4 lb _{DS} /ton _{BLS} 1.93e-3 lb _{MM} /ton _{BLS}			
05	NCASI 1020 & 1050 Stack Test BoilerMACT	0.13 lb _{PM} /MMBtu 0.13 lb _{PM10} /MBtu 1.06E-2 lb _{SO2} /MMBtu 5.91 lb _{VOC} /hr + 20% 164.6 lb _{CO} /hr + 20% 0.212 lb _{NOx} /MMBtu	Wet Scrubber	80%	See permit application for emission factor for other non-criteria pollutants.
			Multiclone	N/A	
06	AP-42 Table 1.4-2	7.6 lb _{PM} /MMscf 7.6 lb _{PM10} /MMscf 0.6 lb _{SO2} /MMscf 5.5 lb _{VOC} /MMscf 84 lb _{CO} /MMscf 100 lb _{NOx} /MMscf	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
10	AP-42, Table 11.17-4	25 ton _{FL} /hr 4500 ton _{FL} /yr 0.61 lb _{PM} /Ton _{FL} 0.61 lb _{PM10} /Ton _{FL}	N/A	N/A	
12	AIRS NCASI	0.02 lb _{SO2} /ADTUBP 0.337 lb _{VOC} /ton BLS 5.2e-3 lb _{H2S} /ton _{BLS} 4.25e-2 lb _{DDS} /ton _{BLS} 8.42e-3 lb _{DS} /ton _{BLS} 1.52e-2 lb _{MM} /ton _{BLS}	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
13, 17	NCASI 677 & 1020	54.0 ton _{CHIP} /hr 602,250 ton _{CHIP} /yr 0.12 lb _{VOC} /ton chips 0.0012 lb _{TRS} /ton chips	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
14	NCASI 1020 & 1050	5.7 ton _{CaO} /hr 44,717 ton _{CaO} /yr 0.035 lb _{VOC} /ton _{CaO}	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
15A-J	NCASI AP-42, Table 1.4-2	NGC: 7.6 lb _{PM} /MMscf 7.6 lb _{PM10} /MMscf 0.6 lb _{SO2} /MMscf 0.5 lb _{VOC} /MMscf 84 lb _{CO} /MMscf 100 lb _{NOx} /MMscf 0.025 lb _{TRS} /ADTFP	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.

SN	Emission Factor Source	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
16A-C, 18, 19A-D	NCASI 1020 & 1050	29.3 sw ton/hr 208,050 sw ton/yr 30 ADTFP/hr 212,673 ADTFP/yr 0.25 lb _{VOC} /ADTFP	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
20-22, 31, 32, 56	NCASI 1050	3.85 lb _{VOC} /hr/tank 0.06651 lb _{TRS} /hr/tank	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
23, 24, 31, 35	NCASI 1020 & 1050	5.7 ton _{CaO} /hr 44,717 ton _{CaO} /yr 0.066 lb _{VOC} /ton _{CaO} 0.00062 lb _{TRS} /ton _{CaO}	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
27	NCASI 1020 & 1050	5.7 ton _{CaO} /hr 44,717 ton _{CaO} /yr 0.0075 lb _{VOC} /ton _{CaO}	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
28-30	NCASI 1050	0.033 lb _{VOC} /hr/tank 0.889 lb _{TRS} /hr/tank	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
33, 34	NCASI 1020 & 1050	0.54 lb _{VOC} /hr/tank 0.21 lb _{TRS} /hr/tank	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
36, 37	NCASI 1020 & 1050	4.84 lb _{VOC} /hr/tank 0.21 lb _{TRS} /hr/tank	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
38, 39, & 55	NCASI 1020 & 1050	0.11 lb _{VOC} /hr/tank 0.26 lb _{TRS} /hr/tank	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
40	NCASI 1020 & 1050	20.8 ADTUBP/hr 161,370 ADTUBP/yr 0.71 lb _{VOC} /ADTUBP 1.48 lb _{TRS} /ADTUBP	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
41	Samples	1.25 ton _{VOC} /qtr + safety factor 31.21 ton _{TRS} /qtr + safety factor	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
50	NCASI AP-42, 13.2.4	602,250 ton _{CHIPS} /yr 9.415E-5 lb _{PM} /ton chips 4.453E-5 lb _{PM10} /ton chips 3.6 lb _{VOC} /acre-day 2.4E-4 lb _{VOC} /ton _{dry}	N/A	N/A	

SN	Emission Factor Source	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
51, 52, 54	NCASI 1020 & 1050	29.3 sw ton/hr 208,050 sw ton/yr 30 ADTFP/hr 212,673 ADTFP/yr 0.18 lb _{VOC} /ADTFP 0.02 lb _{TRS} /ADTFP	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
53	LandGEM	2,000 tons/yr acceptance rate	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
57	AP-42	50 hp Propane 7.21E-4 lb _{PM/PM10} /hp-hr 5.91E-4 lb _{SO2} / hp-hr 0.015 lb _{VOC} / hp-hr 6.96E-3 lb _{CO} / hp-hr 0.011 lb _{NOx} / hp-hr	None	N/A	
58	AP-42	Silt Loading=3.0g/m ²	water roads	80%	
59	AP-42	Silt Content=5.1%	water roads	80%	
60	AP-42	144hp Diesel 1.008 MMBTU/hr 500 hr/yr 2.2E-3 lb _{PM/PM10} /MMBtu 2.05E-3 lb _{SO2} /hp-hr 3.0 lb _{VOC} / MMBtu 3.7 lb _{CO} /MMBtu 3.0 lb _{NOx} /MMBtu	None	N/A	NESHAP ZZZZ Emergency RICE. See permit application for emission factor for other non-criteria pollutants.

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01	PM	5 and 202	Every 5 years	From Previous Permit
	PM ₁₀	5 and 202 or 201A and 202	Every 5 years	From Previous Permit
02	PM	5 and 202	Every 5 years	From Previous Permit
	PM ₁₀	5 and 202 or 201A and 202		
	SO ₂	6C		

SN	Pollutants	Test Method	Test Interval	Justification
	VOC	25A		
	NO _x	7E		
04	TRS	16	Annually	§19.804
01,02, &04	PM/PM10 <i>Overall PM limit</i>	See SCs 262 & 263	Initial 2020, every 5 yrs after	NESHAP Subpart MM
05	Filterable PM CO HCl Mercury	As required by subpart	Initial and annually (opt. to extend to 3 yrs)	Boiler MACT Performance Testing
41	Total HAP	Performance Test (Method 305 of Part 60, Appendix A)	Annually (1 st quarter)	NESHAP S
	% Reduction OR Mass Removal	Performance Test	Annually (1 st quarter)	
	Methanol OR Total HAP	Performance Test	Quarterly (minus 1 st Quarter)	
	Operating Parameters	See SC 85	As needed	
	Soluble BOD5	Method 405.1 of Part 136	quarterly	

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)
01	Concentration of TRS Gases	CEM	continuously	N
	Pressure Differential Across the Scrubber	CMS	Every 15 minutes	N
	Liquid Flowrate Across the Scrubber	CMS	Every 15 minutes	N
02	Concentration of TRS Gases	CEM	Continuously	Y
	Scrubber Liquor Flowrate	CMS	Every 15 minutes	N
	Airflow Across TRS Scrubber	CMS	Every 15 minutes	N
	Secondary Power Across Each ESP Fields	CMS	Every 15 minutes	N

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
	CO Emissions	CEM	Continuously	N
04	Pressure Differential Across the Scrubber	CMS	Every 15 minutes	N
	Liquid Flowrate Across the Scrubber	CMS	Every 15 minutes	N
05	Liquid Flowrate & Pressure drop across the Scrubber	CMS	Every 15 minutes	Y
	Oxygen and CO OR CO ₂	CEMS or Oxygen Analyzer	Continuously	Y
41	Quarterly Emissions Model Methanol Formaldehyde Total Sulfides	24 - hour grab samples for model inputs	Every 3 months	N
57	Hours of operation	Non-resettable hour meter	Continuously	N
60	Hours of operation	Non-resettable hour meter	Continuously	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)
01	Type of Fuel	Natural Gas Only	As needed	N
	Lime Throughput	44,717 tons/yr	Monthly	Y
	Pressure Differential Across the Scrubber	See PT records onsite	Monthly	N
	Liquid Flowrate Across the Scrubber	See PT records onsite	Monthly	N
	Lime Kiln Temperature & Residence Time	Min: 1200°F Min: 0.5 seconds	Continuously	N
02	Type of Fuel Fired	Black Liquor Solids and Natural Gas	As needed	N
	Black Liquor Solids Fired	173,448 tons/yr	Monthly	Y
	Petro Additive	55,000 gal/yr	Monthly	Y
	Petro Additive Max	0.5%	Monthly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Sulfur Content			
	Scrubber Liquor Flowrate	See PT records onsite	Monthly	N
	Airflow Across TRS Scrubber	---	Monthly	N
	Secondary Power Across Each ESP Fields	Minimum total 43.1 kW	Monthly	N
	Operational and Maintenance Procedures	---	As Needed	N
04	Pressure Differential Across the Scrubber	See PT records onsite	Monthly	N
	Liquid Flowrate Across the Scrubber	See PT records onsite	Monthly	N
05	Fuels fired to the source	Natural Gas & Woodwaste, only	--	Y
	Woodwaste Thru-put	109,500 tons/yr	Monthly	Y
	Scrubber fan Amperage	Number to show fan is operating	Monthly	N
	Scrubber Differential Pressure	See PT records onsite	Continuously	Y
	Scrubber liquid flowrate	See PT records onsite	Continuously	Y
	Min Oxygen Level	See PT records onsite	Continuously	Y
	Moisture Content of Biomass	40% minimum	Monthly	Y
06	Amount of fuel used	NA	monthly	Y
	Tune-up for Gas 1 Units	See SC 202	annually	Y
13 & 17	Chip Throughput	602,250 tons/yr	Monthly	Y
15A - 15J	Type of Fuel Fired	Natural Gas Only	As Needed	N
	Paper Production	208,050 s.w. tons/yr	Monthly	Y
	Oven Dried Ton of Pulp (ODTP)	146,708 ODTP/yr	Monthly	Y
	Wet Strength Resin	1,040.25 tons/yr	Monthly	Y
41	Sample Concentration	--	Quarterly	N
	Flow Rate Data	--		
	Model Results	--		
	Quarterly Emissions	See permitted limits		

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Malfunctions	--	Upon occurrence	Y
57	Hours of Operation (must identify emergency and non- emergency)	500 hr/calendar yr Total (100 hr/yr for main. checks/testing – 50hr of which can be nonemergency, see SC134)	Monthly	Y
	Engine oil & filter changes	Every 500 hr or Annually	When changed	N
	Inspect Spark Plugs	Every 1,000 hr or Annually Replace as Necessary	When inspected	N
	Inspect all hoses/belts	Every 500 hr or Annually Replace as Necessary	When inspected	N
58&59	Road Dust Control Activities	Water Roads Weekly and as needed	Daily/Weekly	N
60	Hours of Operation (must identify emergency and non- emergency)	500 hr/ calendar yr Total (100 hr/yr for main. checks/testing – 50hr of which can be nonemergency, see SC134)	Monthly	Y
	Engine oil & filter changes	Every 500 hr or Annually	When changed	N
	Inspect air cleaner	Every 1,000 hr or Annually Replace as Necessary	When inspected	N
	Inspect all hoses/belts	Every 500 hr or Annually Replace as Necessary	When inspected	N
MM	NESHAP MM upsets/malfunctions /corrective actions	--	Each instance – Report Quarterly	Y

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01	20%	19.503	Weekly Observations
02	20%	19.503	Monitor ESP fields (authorized by EPA in lieu of COMS)
03	20%	19.503	Daily Observations
04	20%	19.503	Weekly Observations
05	20%	19.503	Weekly Observations
06	5%	18.501 & Dept. Guidance	Natural Gas Fired

SN	Opacity	Justification for limit	Compliance Mechanism
15A - 15J	5%	18.501 & Dept. Guidance	Natural Gas Fired
57	20%	19.503 & Dept. Guidance	Annual Observation
60	20%	19.503 & Dept. Guidance	Annual Observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
	None

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
Portable Kerosene Heaters (0.152 MMBtu/hr)	A-1	0.25	0.42	0.05	0.42	1.51		0.05
Paper Machine Press Transfer Blowbox (250,000 Btu/hr)	A-1	0.01	0.001	0.01	0.09	0.11		0.01
Total A-1 Activities	A-1	0.26	0.421	0.06	0.51	1.62		0.06
Diesel Fire Pump Tank (1,000 gal)	A-3			0.001				0.001
Recovery Diesel Tank (1,000 gal)	A-3			0.001				0.001
Kerosene Tank #1 (1,000 gal)	A-3			0.001				0.001
Kerosene Tank #2 (1,000 gal)	A-3			0.001				0.001
Taxable Diesel Tank (140 gal)	A-3			0.00012				0.00012
Kerosene Truck Tank (140 gal)	A-3			0.00015				0.00015
Petro Additive Tank (1,000 gal, #2 FO or Diesel)	A-3			0.001				0.001
Total A-3 Activities	A-3			0.00527				0.00527
Spent Caustic Tank	A-4	NA	NA	NA	NA	NA	NA	NA

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Maintenance Welding Hood Vent	A-7							0.1
SN-02 (<80MMBtu/hr), SN-05 (<160MMBtu/hr), or SN-06 (<100MMBtu/hr) Back-Up Temporary Boiler (Nat. Gas)	A-12	NA	NA	NA	NA	NA	NA	NA
Woodyard Diesel Tank	A-13			0.005			0.005	0.005
Unleaded Gas Tank	A-13			0.541			0.541	0.541
Leachate Storage Tank	A-13			0.13			0.13	0.13
Cooling Tower	A-13	0.53						
Total A-13 Activities	A-13	0.53		0.676			0.676	0.676

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 #
0385-AOP-R11

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Twin Rivers Pine Bluff LLC
 Permit Number: 385-AOP-R11
 AFIN: 35-00017

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	1764.09
Permit Type	Modification	Permit Fee \$	1000

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)	33.1
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		238.6	271.7	33.1	33.1	271.7
PM ₁₀		220.4	242.6	22.2		
PM _{2.5}		0	0	0		
SO ₂		64.9	64.9	0	0	64.9
VOC		639.4	639.4	0	0	639.4
CO		22330.1	22330.1	0		
NO _x		350.8	350.8	0	0	350.8
Lead	<input type="checkbox"/>	0.0452	0.0452	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
TRS	<input checked="" type="checkbox"/>	362.3	362.3	0	0	362.3
Acetaldehyde*	<input type="checkbox"/>	10.64	10.64	0		
Hydrogen chloride	<input checked="" type="checkbox"/>	8.66	8.66	0	0	8.66
Hydrogen fluoride	<input checked="" type="checkbox"/>	0.13	0.13	0	0	0.13
Methanol*	<input type="checkbox"/>	175.48	175.48	0		
Total Other HAPs*	<input type="checkbox"/>	28.4	28.4	0		
Acetone	<input checked="" type="checkbox"/>	12.85	12.85	0	0	12.85
Ammonia	<input checked="" type="checkbox"/>	52.38	52.38	0	0	52.38
Hydrogen sulfide*	<input type="checkbox"/>	4.09	4.09	0		
Sulfuric acid	<input checked="" type="checkbox"/>	0.97	0.97	0	0	0.97