

STATEMENT OF BASIS

For the issuance of Air Permit # 684-AR-1 AFIN: 35-00187

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
8001 National Drive
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Fiber Resources, Incorporated
1609 Celia Road
Pine Bluff, AR 71611

3. PERMIT WRITER:

Paula Parker

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Paper and wood recycling
NAICS Code: 321999

5. SUBMITTALS: 8/11/03, 9/10/03, 10/6/03

6. REVIEWER'S NOTES:

Fiber Resources, Inc., located at 1609 Celia Road, Pine Bluff, AR 71611, is a wood and paper recycling facility. Hourly and annual emissions have been quantified for all sources. Process limits corresponding to emission estimates have been added. Two new sources, Tub Grinders (SN-04 and SN-05) for paper recycling, were also added to the permit. Plantwide emissions are estimated to be 23.7 ton/yr PM, 23.4 ton/yr PM₁₀, 8.9 ton/yr SO₂, 1.5 ton/yr VOC, 14.8 ton/yr CO, and 55.4 ton/yr NO_x.

The facility, at the time of its initial permit in 1982, processed clarifier sludge from a pulp and paper mill. The dried pulp was then pelletized for use as boiler fuel or milled for mulch. The permit consisted of only two sources, a Pulp Dryer Cyclone (SN-01) and a Pellet Cooler Cyclone (SN-02). There were no annual emission limits for these sources. Since 1997, the facility no longer processes clarifier sludge.

Particulate emissions from the woodwaste should be generated by the unloading of the woodwaste from the trailers, stacking of the woodwaste into the sheds by front-end loaders, and the loading of woodwaste into the metering hopper at each of the pelletizing lines.

The facility pelletizes wood waste for boiler fuel. Pellets are formed using pressure, vegetable oil, and water. The facility has three palletizing lines, two for hardwood (oak) and one for softwood (pine).

The facility also shreds paper using two tub grinders, each equipped with a 1.5 gpm water spray. Particulate from the actual paper shredding should be negligible. A similar source at a Domtar facility in Ashdown only accounts for the diesel engine emissions.

7. COMPLAINT STATUS:

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

The facility was determined to be operating under an old permit and was required to submit an application in order to update the calculations.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
 Has the facility undergone PSD review in the past? N
 Is the facility categorized as a major source for PSD? N
 ≥ 100 tpy and on the list of 28? N
 ≥ 250 tpy all other? N

PSD Netting

Was netting performed to avoid PSD review in this permit? N

Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
None		

9. EMISSION CHANGES:

The following table summarizes plantwide emission changes associated with this permitting action.

Pollutant	Permit #684-AR-1
PM	23.7
PM ₁₀	23.4

Pollutant	Permit #684-AR-1
SO ₂	8.9
VOC	1.5
CO	14.8
NO _x	55.4

*The initial permit for this facility contained no specific conditions or annual emission limits.

10. MODELING:

Criteria Pollutants

All criteria pollutants are below 100 tpy.

11. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	Dept Memo	0.0022 lb PM/ton 0.00018 lb PM ₁₀ /ton	None		
02	Manufacturer's spec	0.02 gr/scf	Baghouse/cyclone	99.9	Line 1 –7000 SCF/min Line 2 –7000 SCF/min Line 3 –11000 SCF/min
03	Manufacturer's spec	0.02 gr/scf	Baghouse/cyclone		Line 1 -2000 SCF/min Line 2 – 2000 SCF/min
04	AP-42, Section 3.4	0.1lb PM/MMBTU 0.505 lb SO ₂ /MMBTU 0.0819lb VOC/MMBTU 0.85lb CO/MMBTU 3.2 lb NO _x /MMBTU	None		800 HP and 750 HP

12. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

13. 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				

14. RECORD KEEPING 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	Wood waste received	87,000 tons/yr	Monthly	N

15. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01	20	19.503 and A.C.A.	None
02	5	18.501 and A.C.A.	Operation of controls
03	5	18.501 and A.C.A.	Operation of controls
04,05	20	19.503 and A.C.A.	None

16. DELETED CONDITIONS:

Former SC	Justification for removal
None	

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17. VOIDED, SUPERCEDED, OR SUBSUMED PERMITS:

List all active permits voided/superceded/subsumed by the issuance of this permit.

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18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

Lyndon Poole, P.E.