

STATEMENT OF BASIS

For the issuance of Air Permit # 684-AR-2 AFIN: 35-00187

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Fiber Resources, Inc.
1609 Celia Road
Pine Bluff, Arkansas 71601

3. PERMIT WRITER:

Jennifer Boyette

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Wood Chips Made in Sawmills
NAICS Code: 321113

5. SUBMITTALS:

4/3/2009

6. REVIEWER'S NOTES:

Fiber Resources, Inc., located at 1609 Celia Road, Pine Bluff, AR 71611, is a wood and paper recycling facility. This modification is to permit a Chip & Chunk Operation (SN-06 to SN-12). The primary product of this operation is Hickory chips and chunks for back yard grill and barbeque market. The increase in permitted emissions are: 13.8 tpy PM, 13.8 tpy PM₁₀, 12.3 tpy NO_x, 0.7 tpy SO₂, 15.0 tpy CO, 1.4 tpy VOC, 0.06 tpy Methanol, 0.01 tpy Formaldehyde, 0.01 tpy Acrolein, and 0.02 tpy Acetaldehyde.

7. COMPLIANCE STATUS:

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

There are no known enforcement actions at this time.

8. PSD APPLICABILITY:

a. Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

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, explain why this permit modification not PSD?

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
N/A		

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. MODELING:

Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time. *(If*

Non-Criteria Pollutants:

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/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Methanol	262.08	28.8	0.054	Yes
Formaldehyde	0.36	0.0405	0.004	Yes
Acrolein	0.228	0.025	0.002	Yes
Acetaldehyde	45.04	4.95	0.010	Yes

12. 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 & 05	AP-42, Section 3.4	0.11lb 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
06	FIRE Version 6.23 - SCC 30700802	0.35 lb/ton logs PM 0.2 lb/ton lgos PM ₁₀	None		
07	Dept Memo	0.0008 lb/ton logs processed PM 0.00008 lb/ton PM ₁₀	None		
08	FIRE Version 6.23 - SCC 30700803 Sawdust Pile Handling	1 lb/ton log processed PM 0.36 lb/ton log PM ₁₀	None		
09	NACASI	3.5 lb VOC/MBF 0.205 lb Methanol/MBF 0.016 lb Formaldehyde/MBF 0.006 lb Acrolein/MBF 0.039 lb Acetaldehyde/MBF	None		
10	AP-42 1.6.2	3.2 lb PM/MMBTU 2.9 lb PM ₁₀ /MMBTU 0.025 lb SO ₂ /MMBTU 0.013 lb VOC/MMBTU	None		8MMBTU/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		0.6 lb CO/MMBTU 0.49 lb NO _x /MMBTU			
11 & 12	AP-42 10.4 Dept. MEMO	Loading Factor of Dried Shavings 0.0022 lb/ton PM 0.00018 lb/ton PM ₁₀ Storage Dried Shavings 0.0011 lb/ton PM 0.00018 lb/ton PM ₁₀	None		2.5 tons/day wet = 1.875 ton/day dry finished 8 hour/day 5 day/week 52 week/year

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

14. 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				

15. 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	Wood waste received	87,000 tpy	Monthly	N
Facility Wide	Logs	5,200 tpy	Monthly	N

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16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 04-05, & 10	20	19.503 and A.C.A.	None
02, 03, 06-09, 11, & 12	5	18.501 and A.C.A.	Operation of controls

17. DELETED CONDITIONS:

Former SC	Justification for removal
	None

18. GROUP A INSIGNIFICANT ACTIVITIES

*Note: no changes were made to the IA table, therefore emissions were not addressed in this modification.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
2.1 MMBTU/hr Boiler	A-1							
Diesel Tank #1 (1000 gallons)	A-2							
Diesel Tank #2 (1000 gallons)	A-2							
Diesel Tank #3 (600 gallons)	A-3							
Mobiltrans HD30 Tote	A-1							
AW 46 Hydraulic Tote	A-1							

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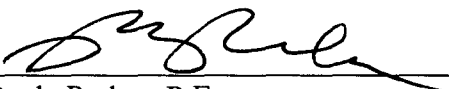
19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
0684-AR-1

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.



Paula Parker, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Facility Name: Fiber Resources, Inc
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\$/ton factor 22.07
 Minimum Fee \$ 400
 Minimum Initial Fee \$ 500
 Check if Administrative Amendment

Permit Predominant Air Contaminant
 Net Chargeable Emission Increase
 Permit Modification Fee \$
 Initial Permit Fee \$
 Annual Chargeable Emissions (tpy)

Old Permit	New Permit
55.4	67.7
12.3	
400	
0	
67.7	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	23.7	38.5	14.8
PM ₁₀	23.4	36.2	12.8
SO ₂	8.9	9.6	0.7
VOC	1.5	2.9	1.4
CO	14.8	29.8	15
NO _x	55.4	67.7	12.3
Methanol	0	0.06	0.06
Formaldehyde	0	0.01	0.01
Acrolein	0	0.01	0.01
Acetaldehyde	0	0.02	0.02
	0	0	0