

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0684-AR-3 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 71611

3. PERMIT WRITER:

Ambrosia Brown

4. PROCESS DESCRIPTION AND NAICS CODE:

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

5. SUBMITTALS:

7/27/2009

6. REVIEWER'S NOTES:

Fiber Resources, Inc., located at 1609 Celia Road, Pine Bluff, AR 71611, is a wood and paper recycling facility. The facility plans on adding a fiber resources process which contains sources SN-13 through SN-21. The addition to the facility will process green hickory logs to create various sized wood chips. If an application is received related to this process, then it may be considered one project and applicable to the resulting air regulations. The resulting increases of emissions are 36.3 tpy PM₁₀ and 78.4 tpy PM

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 currently no enforcement actions or other compliance issues

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)
The facility is not subject to any NSPS, NESHAP, or PSD regulation		

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. MODELING:

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.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
13	WebFIRE	0.20 lb/ton PM 0.011 lb/ton PM ₁₀	None	N/A	
14	WebFIRE	0.35 lb/ton PM 0.20 lb/ton PM ₁₀	None	N/A	
15	WebFIRE	0.35 lb/ton PM 0.20 lb/ton PM ₁₀	None	N/A	
16	WebFIRE	1.00 lb/ton PM 0.36 lb/ton PM ₁₀	None	N/A	
17	WebFIRE SCC:30700804 And 15,000 CFM Rating	2.25 lb/SCFM-Year PM 0.90 lb/SCFM-Year PM ₁₀	None	N/A	
18	ADEQ 08-22-03 Memo	0.0004 lb/ton PM 0.00004 lb/ton PM ₁₀	None	N/A	
19	ADEQ 08-22-03 Memo	0.0008 lb/ton PM 0.00008 lb/ton PM ₁₀	None	N/A	
20	ADEQ 08-22-03 Memo	0.0022 lb/ton PM 0.00017 lb/ton PM ₁₀	None	N/A	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
21	ADEQ 08-22-03 Memo	0.0044 lb/ton PM 0.00034 lb/ton PM ₁₀	None	N/A	

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)
13-21	Logs processed	100,000 tpy	monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
19,21	20%	19.503 and A.C.A.	None
13-18, &20	5%	18.501 and A.C.A.	None

17. DELETED CONDITIONS:

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Former SC	Justification for removal
None	

18. GROUP A INSIGNIFICANT ACTIVITIES

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
No insignificant activities changes in Modification								

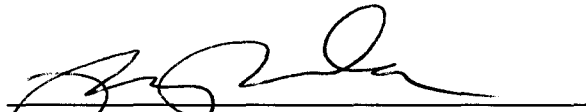
19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
0684-AR-2

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

Revised 07-27-09

Facility Name: Fiber Resources, Inc
 Permit Number: 0684-AR-3
 AFIN: 35-00187

			Old Permit	New Permit
\$/ton factor	22.07	Permit Predominant Air Contaminant	67.7	116.9
Minimum Fee \$	400	Net Chargeable Emission Increase	49.2	
Minimum Initial Fee \$	500	Permit Modification Fee \$	1085.844	
		Initial Permit Fee \$	0	
Check if Administrative Amendment	<input type="checkbox"/>	Annual Chargeable Emissions (tpy)	116.9	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	38.5	116.9	78.4
PM ₁₀	36.2	72.5	36.3
SO ₂	9.6	9.6	0
VOC	2.9	2.9	0
CO	29.8	29.8	0
NO _x	67.7	67.7	0
Methanol	0.06	0.06	0
Formaldehyde	0.01	0.01	0
Acrolein	0.01	0.01	0
Acetaldehyde	0.02	0.02	0