

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0684-AR-5 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:

Jude Jean-Francois

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Sawmills  
NAICS Code: 321113

5. SUBMITTALS:

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
2/12/2016	Modification	1. Add a cyclone (SN-30) and a 133-HP emergency generator (SN-31) 2. Remove SN-07, SN-09, SN-10, SN-11, and SN-12

6. REVIEWER'S NOTES:

Fiber Resources, Inc., located at 1609 Celia Road, Pine Bluff, AR 71611, is a sawmill facility which process wood chips to produce dry fiber. This permit modification is to add a cyclone (SN-30) and a 133-HP emergency generator (SN-31) which is subject to 40 C.F.R. § 60 Subpart III. The following sources will also be removed from the permit: SN-07, SN-09, SN-10, SN-11, and SN-12.

The total annual emission limit decrease by 5.9 tpy PM, 9.0 tpy PM<sub>10</sub>, 0.6 tpy SO<sub>2</sub>, 1.3 tpy VOC, 14.9 tpy CO, and 12.0 tpy NO<sub>x</sub>.

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 was last inspected on November 4, 2014 and was found to be out of compliance. The facility was operating 2 unpermitted sources SN-30 and SN-31.

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 is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-31	PM, CO, NO <sub>x</sub>	40 C.F.R. § 60 Subpart IIII

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H<sub>2</sub>S 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 H<sub>2</sub>S Standards  
 If exempt, explain: No H<sub>2</sub>S emitted

N

## 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 <sub>10</sub> /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	0.1lb PM/MMBTU 0.505 lb SO <sub>2</sub> /MMBTU 0.0819lb VOC/MMBTU 0.85lb CO/MMBTU 3.2 lb NO <sub>x</sub> /MMBTU	None		800 HP and 750 HP
06	Fire version 6.23-SCC 307000802	0.35 lb/ton logs PM 0.2 lb/ton longs PM <sub>10</sub>	None		
08	Fire version 6.23-SCC 307000802	1 lb/ton log processed PM 0.36 lb/ton log PM <sub>10</sub>	None		
13	WebFIRE	0.20 lb/ton PM 0.011 lb/ton PM <sub>10</sub>	None	N/A	
14	WebFIRE	0.35 lb/ton PM 0.20 lb/ton PM <sub>10</sub>	None	N/A	
15	WebFIRE	0.35 lb/ton PM 0.20 lb/ton PM <sub>10</sub>	None	N/A	
16	WebFIRE	1.00 lb/ton PM 0.36 lb/ton PM <sub>10</sub>	None	N/A	
17	WebFIRE SCC:30700804 And 15,000	2.25 lb/SCFM-Year PM 0.90 lb/SCFM-Year	None	N/A	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	CFM Rating	PM <sub>10</sub>			
18	ADEQ 08-22-03 Memo	0.0004 lb/ton PM 0.00004 lb/ton PM <sub>10</sub>	None	N/A	
19	ADEQ 08-22-03 Memo	0.0008 lb/ton PM 0.00008 lb/ton PM <sub>10</sub>	None	N/A	
20	ADEQ 08-22-03 Memo	0.0022 lb/ton PM 0.00017 lb/ton PM <sub>10</sub>	None	N/A	
21	ADEQ 08-22-03 Memo	0.0044 lb/ton PM 0.00034 lb/ton PM <sub>10</sub>	None	N/A	
22	ADEQ 08-22-03 Memo	0.0008 lb/ton PM 0.00008 lb/ton PM <sub>10</sub>	None	N/A	
23	WebFIRE	0.35 lb/ton PM 0.20 lb/ton PM <sub>10</sub>	None	N/A	
24	WebFIRE	2.0 lb/hour PM 0.8 lb/hour PM <sub>10</sub>	None	N/A	
25	ADEQ 08-22-03 Memo	0.0022 lb/ton PM 0.00018 lb/ton PM <sub>10</sub>	None	N/A	
26	ADEQ 08-22-03 Memo	0.0022 lb/ton PM 0.00018 lb/ton PM <sub>10</sub>	None	N/A	
27	ADEQ 08-22-03 Memo	0.0022 lb/ton PM 0.00018 lb/ton PM <sub>10</sub>	None	N/A	
28	WebFIRE	1.0 lb/ton PM 0.36 lb/ton PM <sub>10</sub>	None	N/A	
29	AP-42 Emission Factors 1.6.1, 1.6.2, and 1.6.3	0.4 lb/MMBTU PM 0.36 lb/MMBTU PM <sub>10</sub> 0.49 lb/MMBTU NO <sub>x</sub> 0.025 lb/MMBTU SO <sub>2</sub> 0.6 lb/MMBTU CO 0.017 lb/MMBTU VOC 0.004 lb/MMBTU Acrolein 0.0044 lb/MMBTU Formaldehyde	None	N/A	24MMBTU
30	WebFIRE SCC:30700804 And 15,000 CFM Rating	2.25 lb/SCFM-Year PM 0.90 lb/SCFM-Year PM <sub>10</sub>	None	N/A	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
31	AP-42 Chapter 3.3 Table 3.3-1	Lb/hp-hr PM/PM <sub>10</sub> =2.20E-03 SO <sub>2</sub> =2.05E-03 VOC=2.51E-03 CO=6.68E-03 NO <sub>x</sub> =0.031			133 HP CI-Emergency

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)
06, 08, 30	Green wood chip	5,200 tons/yr	Monthly	N
13-29	Logs processed	100,000 tons/yr	monthly	N
22-29	Hours of Operation	4,000 hours/yr	Monthly	N
31	Hours of Operation	500 hours/yr	Monthly	N

16. OPACITY:

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SN	Opacity	Justification for limit	Compliance Mechanism
01, 04, 05, 10, 19, 21, 22, 23, 27, 29, 31	20%	Reg.19.503	Inspection
02, 03, 06, 08, 13, 14, 15, 16, 17, 18, 20, 24, 25, 26, 28, 30	5%	Reg.18.501	Inspection

17. DELETED CONDITIONS:

Former SC	Justification for removal
	None

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	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-4

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Fiber Resources, Inc.

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			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	152.8	146.9
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	-5.9	
Minimum Initial Fee \$	500			
		Permit Fee \$	400	
Check if Administrative Amendment <input type="checkbox"/>		Annual Chargeable Emissions (tpy)	146.9	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	152.8	146.9	-5.9
PM <sub>10</sub>	98.4	89.4	-9
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	10.8	10.2	-0.6
VOC	3.9	2.6	-1.3
CO	58.6	43.7	-14.9
NO <sub>x</sub>	91.3	79.3	-12
Acetaldehyde	0.02	0	-0.02
Acrolein	0.21	0.2	-0.01
Formaldehyde	0.23	0.22	-0.01
Methanol	0.06	0	-0.06
Total HAPs	0.52	0.52	0