

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0684-AR-6 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:

Elliott Marshall

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Sawmills
NAICS Code: 321113

5. ALL 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
9/22/2017	Deminimis/Modification	Add new sources SN-32, 33, and 34.

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:

1. To remove SN-06: The L&M radial arm chain saw.
2. Add new source SN-32, a 0.055" thick band saw for Saw Mill 2.
3. Add new source SN-33, a 5/16" twin circular blade edger for Saw Mill 2.
4. Add new source SN-34, a 5/16" twin circular blade edger on Saw Mill 1.
5. Request merging of the permit limit in tons of logs per year for SN-08, 30, 32, & 33 and SN-13 through 21 & 34. Saw Mill 2 (SN-08, 30, 32, and 33) process the larger diameter logs which are too large to run in Saw Mill 1 (SN-13 through 21 & 34). Fiber Resources,

Inc. requests that both Saw Mill 1 and Saw Mill 2 have a joint permit limit in tons of logs purchased per year of 125,000 tons/yr. Logs are weighed upon arrival to the facility and then sorted by diameter.

The permitted emissions are increasing by 9.4 tpy PM and 5.0 tpy PM₁₀.

7. COMPLIANCE STATUS:

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

This permitting action is the result of an inspection report. The facility has 3 unpermitted sources, and has upset conditions #11, 13, and 17 of their permit. There is an active CAO at this time addressing these 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 is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-31	PM, CO, NO _x	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) 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
 If exempt, explain: No H₂S 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 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	None		800 HP and 750 HP
05		0.505 lb SO ₂ /MMBTU 0.0819lb VOC/MMBTU 0.85lb CO/MMBTU 3.2 lb NO _x /MMBTU			
06	Removed with issuance of this permit.				
08	Fire version 6.23-SCC 307000802	1 lb/ton log processed PM 0.36 lb/ton log PM ₁₀	None		
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	2.25 lb/SCFM-Year PM 0.90 lb/SCFM-Year 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
	And 15,000 CFM Rating				
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	
21	ADEQ 08-22-03 Memo	0.0044 lb/ton PM 0.00034 lb/ton PM ₁₀	None	N/A	
22	ADEQ 08-22-03 Memo	0.0008 lb/ton PM 0.00008 lb/ton PM ₁₀	None	N/A	
23	WebFIRE	0.35 lb/ton PM 0.20 lb/ton PM ₁₀	None	N/A	
24	WebFIRE	2.0 lb/hour PM 0.8 lb/hour PM ₁₀	None	N/A	
25	ADEQ 08-22-03 Memo	0.0022 lb/ton PM 0.00018 lb/ton PM ₁₀	None	N/A	
26	ADEQ 08-22-03 Memo	0.0022 lb/ton PM 0.00018 lb/ton PM ₁₀	None	N/A	
27	ADEQ 08-22-03 Memo	0.0022 lb/ton PM 0.00018 lb/ton PM ₁₀	None	N/A	
28	WebFIRE	1.0 lb/ton PM 0.36 lb/ton PM ₁₀	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 ₁₀ 0.49 lb/MMBTU NO _x 0.025 lb/MMBTU SO ₂ 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 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
31	AP-42 Chapter 3.3 Table 3.3-1	<u>Lb/hp-hr</u> PM/PM ₁₀ =2.20E-03 SO ₂ =2.05E-03 VOC=2.51E-03 CO=6.68E-03 NO _x =0.031			133 HP CI-Emergency
32	WebFIRE	0.35 lb/ton PM 0.20 lb/ton PM ₁₀	None	N/A	
33	WebFIRE	0.35 lb/ton PM 0.20 lb/ton PM ₁₀	None	N/A	
34	WebFIRE	0.35 lb/ton PM 0.20 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)
08, 13-21, 30, 32-34	Logs processed	125,000 tons/yr	monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
22-29	Hours of Operation	4,000 hours/yr	Monthly	N
31	Hours of Operation	500 hours/yr	Monthly	N

16. OPACITY:

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, 32, 33, 34	5%	Reg.18.501	Inspection

17. DELETED CONDITIONS:

Former SC	Justification for removal
10,11,12, & 13	Merging permit limits for logs processed at Saw Mill 1 and Saw Mill 2.

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 changed in this Modification								

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
0684-AR-5

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Fiber Resources, Inc.

Permit Number: 0648-AR-6

AFIN: 35-00187

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	146.9	146.3
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	-0.6	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	146.3	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	146.9	146.3	-0.6
PM ₁₀	89.4	81.8	-7.6
PM _{2.5}	0		0
SO ₂	10.2	10.2	0
VOC	2.6	2.6	0
CO	43.7	43.7	0
NO _x	79.3	79.3	0
Acrolein	0.2	0.2	0
Formaldehyde	0.22	0.22	0
Total HAPs	0.52	0.52	0