

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0684-AR-7 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:

The following is a list of ALL permit applications included in this permit revision.

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
6/10/2019	Deminimis	-Add new source SN-35. -Correct calculation error at sources SN-08 through 16 and SN-32 through 34.

6. REVIEWER'S NOTES:

This application was submitted as a de minimis change to Permit No. 0684-AR-6 to:

1. Install a new Wood-Mizer Resaw (SN-35) in Saw Mill 1: Railroad Ties and Lumber.
2. Revise PM/PM₁₀ emissions for sources SN-08 through 16 and SN-32 through 34 to correct a calculation error made in Permit #: 0684-AR-6.

Permitted emissions are increasing by 15.5 tpy PM and 15.1 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.

There are no pending or active enforcement actions.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? N/A

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 for 8(b), 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, 40 C.F.R. § 63 Subpart ZZZZ

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N/A

If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
N/A		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

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:

No H₂S emissions.

13. 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			
08	Fire version 6.23-SCC	1 lb/ton log processed PM 0.36 lb/ton log PM ₁₀	None		

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	307000802				
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	
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	None	N/A	24MMBTU

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		0.017 lb/MMBTU VOC 0.004 lb/MMBTU Acrolein 0.0044 lb/MMBTU Formaldehyde			
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	
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	
35	WebFIRE	0.35 lb/ton PM 0.20 lb/ton PM ₁₀	None	N/A	

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

15. 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				

16. 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, 32-35	Logs processed	125,000 tons/yr	Monthly	N
22-29	Hours of Operation	4,000 hours/yr	Monthly	N
31	Hours of Operation	500 hours/yr	Monthly	N

17. 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, 35	5%	Reg.18.501	Inspection

18. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

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

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Diesel Tank #1 (1000 gallons)	A-2							
Diesel Tank #2 (1000 gallons)	A-2							
Diesel Tank #3 (600 gallons)	A-3							

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0684-AR-6

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-7

AFIN: 35-00187

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	146.3	161.8
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	15.5	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	161.8	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	146.3	161.8	15.5
PM ₁₀	81.8	96.9	15.1
PM _{2.5}	0	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