STATEMENT OF BASIS

For the issuance of Air Permit # 1681-AOP-R19   AFIN: 70-00473

1.   PERMITTING AUTHORITY:

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

2.   APPLICANT:

        Anthony Forest Products Company, LLC
        1236 Urbana Road
        El Dorado, Arkansas 71730

3.   PERMIT WRITER:

        Alexander Sudibjo

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
7/18/2019	Renewal	Updated emission calculations for SN-06

6.   REVIEWER'S NOTES:

        This is a Title V permit renewal for the facility. In this renewal, the facility is requesting
        the following changes:
        1. Update the emissions from the abort stacks (SN-25, SN-28, and SN-31) to be
            bubbled with the emissions from the DPKs (SN-23, SN-27, and SN-30) during
            normal operations. The hot gas stream from the gasifier/burners may be diverted
            to the DPK abort stacks (SN-25 for DPK #1, SN-31 for DPK #2, and SN-28 for

        DPK #3) for unplanned shutdowns or temporary idling during normal operations. There is no emissions increase.

2. Remove the throughput limit for sawdust from Specific Condition #4. The DPK emissions are calculated based on dried lumber throughput only.
3. Update Specific Condition #10 to remove the requirement to test at 90% of the gasifier/burner capacity. Testing shall be conducted with the source operating at 90% of the kiln capacity only.
4. Update Specific Condition #11 to apply only during startups. Diesel will only be burned during startups and the hour of operation limits only apply for startups.
5. Remove Specific Condition #18 and #19. Emissions from the sawmill (SN-06) will be based on the logs being transported since all raw logs transported onsite are processed through the sawmill.
6. Remove throughput limits for by-products from Specific Condition #24. The emission calculations for the by-products are based on the mill's recovery factors and they have been updated to provide a more conservative estimate.

The facility's permitted annual emissions are increasing by 1.4 tpy PM and 0.2 tpy PM_{10}.

7.   COMPLIANCE STATUS:

The facility was last inspected on November 15, 2017. No violations were found during the inspection. ECHO shows an unknown compliance status (https://echo.epa.gov/detailed-facility-report?fid=110001702346).

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? Y
- *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. This permit modification does not include a major modification as defined by 40 C.F.R. § 52.21(b)(2).

9.   SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	-	40 CFR Part 63, Subpart DDDD
26	-	40 CFR Part 60, Subpart IIII
26	-	40 CFR Part 63, Subpart ZZZZ
27 and 28	VOC	PSD

10.   PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? Y
(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
If not, explain why.   The applicant did not include this information.

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
None Specified		

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:

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/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = $0.11 \times$ TLV	Proposed lb/hr	Pass?
Lead	0.05	5.50E-03	5.41E-03	Yes
Acrolein	0.229	0.025	0.321	No
Formaldehyde	0.368	0.04	1.27	No
Methanol	262.1	28.83	4.64	Yes
Pentachlorophenol	0.5	0.055	5.75E-06	Yes
Antimony	0.5	0.055	8.91E-04	Yes
Arsenic	0.01	1.10E-03	2.48E-03	No
Beryllium	5.00E-05	5.50E-06	1.24E-04	No
Cadmium	0.01	1.10E-03	4.62E-04	Yes
Chromium	0.5	0.055	2.37E-03	Yes
Chromium VI	0.01	1.10E-03	3.03E-04	Yes
Cobalt	0.02	2.20E-03	7.33E-04	Yes
Manganese	0.1	0.011	0.18	No
Mercury	0.01	1.10E-03	3.95E-04	Yes
Phosphorus	0.1	1.10E-03	3.05E-03	Yes
Selenium	0.2	2.20E-03	3.16E-04	Yes

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL (μg/m^3) = 1/100 of Threshold Limit Value	Modeled Concentration (μg/m^3)	Pass?
Acrolein	2.292	1.007	Yes
Formaldehyde	15	5.363	Yes
Arsenic	0.1	0.0092	Yes
Beryllium	5.00E-04	4.58E-04	Yes

Pollutant	PAIL ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Manganese	1.0	0.666	Yes

c) H_2S Modeling:

The facility does not have any H_2S emissions.

13.   CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
06 Debarking	AP-42, 10.1 TCEQ Wood Industry Emission Factors – Log Debarking Controls (Appendix A7)	PM = 0.024 lb/ton PM_{10} = 11% of PM $PM_{2.5}$ = 50% of PM_{10}	Partial building enclosure	95%	920,000 ton/yr 225 ton/hr
06 Sawing	AP-42 10.1 TCEQ Wood Industry Emission Factors – Sawing Controls (Appendix A7)	PM = 0.35 lb/ton PM_{10} = 11% of PM $PM_{2.5}$ = 50% of PM_{10}	Building Enclosure	90%	920,000 ton/yr 225 ton/hr
20	AP-42, 13.2	19 paved sections 0 unpaved sections	Wet Suppression	50%	Logs = 920,000 ton/yr Chips/barks = 316,658 ton/yr Shavings = 57,517 ton/yr Finished Lumber = 261,535 ton/yr
21	Vendor	0.01 grain/scf 42,800 cfm 7000 grain/lb PM_{10} = 40% of PM $PM_{2.5}$ = 50% of PM_{10}	Cyclone and Baghouse	Cyclone 94% & Baghouse 99.9%	3,600 hr/yr
23, 27, 30 Biomass	ADEQ Memo (10/31/2014)	VOC = 3.8 lb/MBF	-	-	SN-23 25 MMBtu/hr 8.2 MBF/hr 71,610 MBF/yr 219,000 MMBtu/hr 2.9 tons sawdust/hr SN-27 31.5 MMBtu/hr 8.7 MBF/hr 75,000 MBF/yr
	NCDENR Wood Kiln Emission Calculator	PM/PM_{10}/$PM_{2.5}$ = 0.143 lb/MBF Acetaldehyde = 0.052 lb/MBF Acrolein = 0.0075 lb/MBF Methanol = 0.161 lb/MBF Phenol = 0.01 lb/MBF			
	NCASI Special Report 08-01, May 2008	Formaldehyde = 0.04 lb/MBF			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	AP-42, 1.6	SO_2 = 0.025 lb/MMBtu CO = 0.6 lb/MMBtu Various HAPs			275,940 MMBtu/hr 3.6 tons sawdust/hr
	GHG Mandatory Reporting Rule	CO_2 = 206.7352 lb/MMBtu CH_4 = 0.0158688 lb/MMBtu N_2O = 0.007934 lb/MMBtu			SN-30 30 MMBtu/hr 11.9 MBF/hr 93,500MBF/yr 262,800 MMBtu/hr 3.4 tons sawdust/hr
27 Natural Gas	AP-42, 1.4	NOx = 0.27 lb/MMBtu Various HAPs	-	-	31.6 MMBtu/hr
25, 28, 31 Diesel Fuel	AP-42, 1.3	SO_2 = 7.1 lb/1000 gal NO_X = 20 lb/1000 gal CO = 5 lb/1000 gal PM = 2 lb/1000 gal VOC = 1.1 lb/1000 gal	-	-	Max diesel usage 15 gal/hr 360 gal/yr
25, 28, 31 Sawdust	AP-42, 1.6	PM = 0.33 lb/MMBtu PM_{10} = 0.29 lb/MMBtu $PM_{2.5}$ = 0.29 lb/MMBtu SO_2 = 0.025 lb/MMBtu NO_X = 0.22 lb/MMBtu CO = 0.6 lb/MMBtu VOC = 0.017 lb/MMBtu Various HAPs	-	-	8.8 MMBtu/hr 4382 Btu/lb 2000 lb/hour Max duration of startup = 24 hours Max 12 startups per kiln in a year Max hours of operation = 288 hour/yr per kiln
	GHG Mandatory Reporting Rule	CO_2 = 206.7352 lb/MMBtu CH_4 = 0.0158688 lb/MMBtu N_2O = 0.007934 lb/MMBtu			
26	NSPS IIII Tier 3 Limit	PM/PM_{10} = 0.15 g/bhp-hr NOx = 3.0 g/bhp-hr CO = 2.6 g/bhp-hr	-	-	175 bhp 1.47 MMBtu/hr 500 hr/yr
	AP-42, 3.3-2	VOC = 0.36 lb/MMBtu SO_2 = 0.29 lb/MMBtu Various HAPs			

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
23 (DPK#1)	PM_{10}	5	One time (performed on February 28, 2018)	Dept. Guidance (Test for Emission Verification)
	CO	10		
30 (DPK#2)	PM_{10}	5	One time	Dept. Guidance (Test for Emission Verification)
	CO	10		

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
27 (DPK#3)	PM$_{10}$	201/201A	One time (performed on October 2, 2018)	Dept. Guidance (Test for Emission Verification)
	CO	10		

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)
N/A				

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)
20	Wet Suppression Application	As needed to control visible emissions from traffic	As needed but no less than once a month	N
	Products Transported	in tons of product per consecutive 12 months Logs: 920,000 Finished Lumber: 261,535	Monthly	Y
21	Planer Mill Hours of Operation	3,600 hours per consecutive 12 months	Monthly	Y
23 & 25	Lumber Throughput	71.61 MMBF per consecutive 12 months	Monthly	Y
27 & 28	Lumber Throughput	75.0 MMBF per consecutive 12 months	Monthly	Y
30 & 31	Lumber Throughput	93.5 MMBF per consecutive 12 months	Monthly	Y
25	Diesel fuel usage limit as starter fluid	360 gallons per consecutive 12 months	Daily when in startup	N
	Abort stack operating hours	288 hours per consecutive 12 months	Monthly	Y
	Sawdust	2000 lb of sawdust per hour	Daily when	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	throughput limit for gasifier/burner		in startup	
28	Diesel fuel usage limit as starter fluid	360 gallons per consecutive 12 months	Daily when in startup	N
	Abort stack operating hours	288 hours per consecutive 12 months	Monthly	Y
	Sawdust throughput limit for gasifier/burner	2000 lb of sawdust per hour	Daily when in startup	N
31	Diesel fuel usage limit as starter fluid	360 gallons per consecutive 12 months	Daily when in startup	N
	Abort stack operating hours	288 hours per consecutive 12 months	Monthly	Y
	Sawdust throughput limit for gasifier/burner	2000 lb of sawdust per hour	Daily when in startup	N
26	Hours of Operation	500 hours per calendar year	Monthly	Y

17.   OPACITY:

SN	Opacity %	Justification for limit	Compliance Mechanism
06	20	Reg.19.503	Weekly observation
20	5	Reg.18.501	Weekly observation
21	5	Reg.18.501	Monthly observation
23, 27, 30	20	Reg.19.503	Weekly observation
25, 28, 31	20	Reg.19.503	Observation during Startup
26	20	Reg.19.503	Daily Observation when use exceeds 24-hours per event

18.   DELETED CONDITIONS:

Former SC	Justification for removal
18	Throughput limit for SN-06 is redundant with the throughput limit for SN-20 because all logs coming into the facility will be processed by the Sawmill.

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	HAPs Total
Bark storage pile	A-13	0.95	0.47						
Sawdust storage pile	A-13	1.08	0.54						
Boiler ash (Biochar) storage Pile	A-13	1.44	0.72						
Chip Overflow Pile	A-13	0.83	0.41						
Planer Mill Woodwaste storage bin	A-13	0.083	0.007						
Fuel Storage Silo	A-13	0.143	0.012						
Chip Storage Bin	A-13	0.132	0.013						
1,000 Gasoline tank	A-13				0.67				
Parts Washer	A-13				0.01				
Planer Mill Trim Cyclone	A-13	0.27	0.27						
A-13 Total		4.928	2.442		0.68				
500 gallon diesel tank	A-3				0.01				
1000 gallon diesel tank	A-3				0.01				
1000 gallon diesel tank	A-3				0.01				

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 #
1681-AOP-R18

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Facility Name: Anthony Forest Products Company
Permit Number: 1681-AOP-19
AFIN: 70-00473

$/ton factor	23.93	Annual Chargeable Emissions (tpy)	618.5
Permit Type	Modification	Permit Fee $	1000

Minor Modification Fee $	500
Minimum Modification Fee $	1000
Renewal with Minor Modification $	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	☐
If Hold Active Permit, Amt of Last Annual Air Permit Invoice $	0
Total Permit Fee Chargeable Emissions (tpy)	1.4
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM: *Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

Air Contaminants: *All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		57.9	59.3	1.4	1.4	59.3
PM$_{10}$		26.4	26.6	0.2		
PM$_{2.5}$		0	0	0		
SO$_2$		10.1	10.1	0	0	10.1
VOC		456.8	456.8	0	0	456.8
CO		230.1	230.1	0		
NO$_X$		92.3	92.3	0	0	92.3
Lead	☐	1.84E-02	1.84E-02	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Acrolein	☐	9.16E-01	9.16E-01	0		
Antimony	☐	3.02E-03	3.02E-03	0		
Arsenic	☐	8.42E-03	8.42E-03	0		
Beryllium	☐	4.21E-04	4.21E-04	0		
Cadmium	☐	1.57E-03	1.57E-03	0		
Chromium	☐	8.04E-03	8.04E-03	0		
Chromium VI	☐	1.33E-03	1.33E-03	0		
Cobalt	☐	2.49E-03	2.49E-03	0		
Manganese	☐	6.12E-01	6.12E-01	0		
Mercury	☐	1.34E-03	1.34E-03	0		
Methanol	☐	19.34	19.34	0		
Pentachlorophenol	☐	1.95E-05	1.95E-05	0		
Phosphorus	☐	1.03E-02	1.03E-02	0		
Selenium	☐	1.07E-03	1.07E-03	0		
Formaldehyde	☐	4.83	4.83	0		
Total Other HAPs	☐	18.29	18.29	0		
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