

## STATEMENT OF BASIS

*for the issuance of Draft Air Permit #1681-AOP-R2*

**1. PERMITTING AUTHORITY:**

Arkansas Department of Pollution Control and Ecology  
8001 National Drive  
Post Office Box 8913  
Little Rock, Arkansas 72219-8913

**2. APPLICANT:**

Anthony Forest Products Co.  
1236 Urbana Road  
Urbana, AR 71768

**3. PERMIT WRITER:**

Lloyd Davis

**4. PROCESS DESCRIPTION AND SIC CODE:**

SIC Description: Forest products  
SIC Code: 0831

**5. SUBMITTALS:** 1/13/98

**6. REVIEWER'S NOTES:**

The present minor modification was drafted in response to a request from Anthony Forest Products to change specific condition #18 to allow readings of steam production rates every 24 hours instead of the hourly rates previously required. No changes in operating conditions or plant emissions have been requested.

**7. APPLICABLE REGULATIONS:**

NSPS (Y/N)	_____ N _____	If yes, subpart _____
NESHAP (Y/N)	_____ N _____	If yes, subpart _____
PSD applicability (Y/N)	_____ N _____	
Is facility on 28 list (100 tpy)? (Y/N)	_____ N _____	
Was netting performed to avoid PSD review (Y/N)	_____ N _____	

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Subject to 112 (g) requirements (Y/N)                          N        
Subject to CAM requirements (Y/N)                          N        
Other applicable regulations: None

**8. EMISSION CHANGES:**

The following table summarizes plantwide emission changes associated with this permitting action.

<b>Plantwide Permitted Emissions (ton/yr)</b>			
<b>Pollutant</b>	<b>Air Permit 1681-AOP-R1</b>	<b>Air Permit 1681-AOP-R2</b>	<b>Change</b>
PM/PM <sub>10</sub>	134.8	134.8	0
SO <sub>2</sub>	4.8	4.8	0
VOC	154.2	154.2	0
CO	135.2	135.2	0
NO <sub>x</sub>	89.5	89.5	0
HAPs	0.6	0.6	0
Heavy Metals	4.0	4.0	0

**9. MODELING:**

**A. Criteria Pollutants**

Pollutant	Emission Rate (lb/hr)	NAAQS Standard ( $\mu\text{g}/\text{m}^3$ )	Averaging Time	Highest Concentration ( $\mu\text{g}/\text{m}^3$ )	% of NAAQS
PM <sub>10</sub>	30.8	50	Annual	13.3	27%
		150	24-hour	53.1	35%
SO <sub>2</sub>	0.5	80	Annual	0.3	0%
		1,300	3-hour	2.7	0%
		365	24-hour	1.2	0%
NO <sub>x</sub>	23.4	100	Annual	21.3	0%
VOC	35.4	0.12**	1-hour (ppm)	0.016ppm	13%
CO	22.9	10,000	8-hour	36.6	0%
		40,000	1-hour	57.3	0%

\*\*Ozone standard. Used Scheffe equation to calculate increase in ozone.

**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 PAER was deemed by the Department to be the product, in lb/hr, of 0.11 and the Threshold Limit Value ( $\text{mg}/\text{m}^3$ ), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV ( $\text{mg}/\text{m}^3$ )	PAER (lb/hr) = 0.11*TLV	Proposed lb/hr	Pass?
Benzene	1.6	0.176	0.012	Yes
Formaldehyde	0.37	0.041	0.023	Yes
Napthalene	52	0.572	0.008	Yes

**10. CALCULATIONS:**

<b>SN</b>	<b>Emission Factor Source (AP-42, Testing, etc)</b>	<b>Emission Factor and units (lbs/ton, lbs/hr, etc)</b>	<b>Control Equipment Type (if any)</b>	<b>Control Equipment Efficiency</b>
SN-01	AP-42 Table 1.4-2 Table 1.4-3	PM: 13.7 lb/MMCF SO <sub>2</sub> : 0.6/MMCF CO: 35/MMCF NO <sub>x</sub> : 140/MMCF	None	
SN-02 SN-14	industry average	3.5 lb/1000BF	none	
SN-03 SN-04	AP-42 Table 10.4-1	0.03 gr/scf	Cyclones	80%
SN-07	AP-42 Table 10.4-2	Vent: 1.0 lb/ton Loadout: 2.0 lb/ton	none	
SN-12 SN-13	actual test of each boiler	PM <sub>10</sub> - 9.0 lb/hr CO - 15.0 lb/hr SO <sub>2</sub> - 0.5 lb/hr NO <sub>x</sub> - 0.26 lb/MMBtu	none	
SN-12 SN-13	AP-42 Table 10.4-2	VOC - <u>0.026 lb</u> MMBtu	none	

**11. TESTING REQUIREMENTS:**

This permit does not require stack testing of any the sources.

**12. MONITORING OR CEMS:**

The are no parameters that must be monitored with CEMs or other monitoring equipment (temperature, pressure differential, etc).

**13. RECORD KEEPING REQUIREMENTS:**

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency *	Report (Y/N)**
01, 02, and 14	Throughput of lumber Natural gas usage	84 MMBF/year 211 MMCF/year	monthly	N
12, 13	Production of steam	178.7 lb/year	monthly	N
03, 04, and 15	Ththroughput of lumber	91 MMBY/year	monthly	N

\* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

\*\* Indicates whether the item needs to be included in reports

**14. OPACITY**

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
01, 02, and 14	5%	Dept. Guidance	daily observation
03, 04, and 15	5%	Dept. Guidance	daily observation
12 and 13	20%	Dept. Guidance	daily observation

**15. DELETED CONDITIONS:**

No Specific Conditions included in the previous permit were deleted for the current permitting action.

- 16. VOIDED, SUPERSEDED OR SUBSUMED PERMITS:**  
**List all active permits for this facility which are voided/superseded/subsumed by issuance of this permit.**

Permit #
1681-AOP-RO
1681-AOP-R1

- 17. CONCURRENCE BY:**

The following supervisor concurs with the permitting decision:

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*Steve Patrick, P.E.*