

## STATEMENT OF BASIS

For the issuance of Air Permit # 2348-AOP-R3 AFIN: 70-00032

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Resolute El Dorado Inc.  
5482 Junction City Highway  
El Dorado, Arkansas 71730

3. PERMIT WRITER:

Sterling Powers

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<br>(New, Renewal, Modification,<br>Deminimis/Minor Mod, or<br>Administrative Amendment) | Short Description of Any Changes<br>That Would Be Considered New or<br>Modified Emissions |
|---------------------|---|---|
| 8/15/2022           | Minor Mod   | Remove Emergency Fire Pump (SN-10R)<br>Add new Emergency Fire Pump (SN-17)                |

6. REVIEWER'S NOTES:

This permit modification will replace the existing fire pump engine (SN-010R) with a new diesel fire pump engine (SN-017), to provide adequate water flow for the fire protection system during emergency situations. Permitted Emissions increased by 0.1 SO<sub>2</sub> tpy, 0.2 VOC tpy, and 0.1 NO<sub>x</sub> tpy.

## 7. COMPLIANCE STATUS:

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

The Division issued a proposed Consent Administrative Order (CAO) on February 22, 2022. A meeting with the Division compliance and enforcement was held on March 8, 2022, to discuss the proposed CAO and the efforts Resolute is undertaking to prove compliance with the hourly emission limit in SC-11. At this time, the Division agreed to hold the proposed CAO until such a time as SN-06 can be retested with three 6-hour tests and those results can be shared with the Division for evaluation of compliance.

The required retest was completed on the dates of March 22-24, 2022, which resulted in a formal withdrawal of enforcement action on June 2, 2022, from Mr. Brant Wright of the Division. With SN-06 having been shown to be in compliance with current permit terms and conditions, a final progress report for this matter will be provided within the next semi-annual monitoring report. Additionally, compliance certifications will continue to be submitted annually in accordance with General Provision No. 21.

## 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

b) Is the facility categorized as a major source for PSD? Y

- *Single pollutant  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

A PSD analysis demonstrates that the emergency fire pump engine emissions do not exceed the PSD significant emission rate (SER) for any NSR regulated pollutants.

| Actual-to-Projected-Actual (ATPAT) | PM   | PM10 | PM2.5 | SO2 | VOC  | CO   | NOX  |
|------------------------------------|------|------|-------|-----|------|------|------|
| <b>Total BAE</b>                   | 0    | 0    | 0     | 0   | 0    | 0    | 0    |
| <b>Total PAE</b>                   | 0.02 | 0.02 | 0.02  | 0.1 | 0.33 | 0.29 | 0.33 |
| <b>SER Threshold</b>               | 25   | 15   | 10    | 40  | 40   | 100  | 40   |
| <b>Pass? Y/N</b>                   | Y    | Y    | Y     | Y   | Y    | Y    | Y    |

## 9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

| Source | Pollutant                                     | Regulation<br>(NSPS, NESHAP or PSD) |
|--------|---|-------------------------------------|
| 01, 02 | Initial Notification is the only requirement. | NESHAP Subpart DDDD                 |
| 17     | HAPs  | NESHAP Subpart ZZZZ                 |

## 10. UNCONSTRUCTED SOURCES:

| Unconstructed Source | Permit Approval Date | Extension Requested Date | Extension Approval Date | If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit |
|----------------------|----------------------|--------------------------|-------------------------|---|
| N/A                  |                      |                          |                         |   |

## 11. 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 Rule 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.

## 12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

| Source | Pollutant Controlled | Cite Exemption or CAM Plan Monitoring and Frequency |
|--------|----------------------|---|
| N/A    |                      |   |

## 13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

## 14. 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 DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:  
1<sup>st</sup> 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 ( $\text{mg}/\text{m}^3$ ), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

| Pollutant             | TLV ( $\text{mg}/\text{m}^3$ ) | PAER (lb/hr) = $0.11 \times \text{TLV}$ | Proposed lb/hr | Pass? |
|-----------------------|--------------------------------|---|----------------|-------|
| Acrolein <sup>2</sup> | 0.2292                         | 0.0252                                  | 0.29           | Fail  |
| Formaldehyde          | 1.5                            | 0.165                                   | 0.71           | Fail  |
| Methanol <sup>1</sup> | 262.08                         | 28.829                                  | 7.38           | Pass  |
| POM <sup>2</sup>      | 0.200                          | 0.022                                   | 1.41E-04       | Pass  |
| Selenium <sup>2</sup> | 0.200                          | 0.022                                   | 3.18E-06       | Pass  |

<sup>1</sup> Annual emission greater than 10 tpy

<sup>2</sup> Under 1  $\text{mg}/\text{m}^3$  TLV

2<sup>nd</sup> 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 ( $\mu\text{g}/\text{m}^3$ ) = 1/100 of Threshold Limit Value | Modeled Concentration ( $\mu\text{g}/\text{m}^3$ ) | Pass? |
|--------------|--|--|-------|
| Acrolein     | 2.292  | 2.28975  | Yes   |
| Formaldehyde | 15.00  | 5.64144  | Yes   |

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

N/A

If exempt, explain: \_\_\_\_\_

## 15. CALCULATIONS:

| SN      | Emission Factor Source (AP-42, testing, etc.)  | Emission Factor (lb/ton, lb/hr, etc.)  | Control Equip.   | Control Equip. Eff. | Comments  |
|---------|--|--|------------------|---------------------|---|
| 01, 02  | ADEQ Memo: <i>VOC emissions from Lumber Drying Kilns</i> from T Rheaume dated 10/31/2014<br><br>AP-42 Tables 1.4-1, -2, -3 Natural Gas | BACT Limit: 3.8 lb VOC/MBF <sup>1</sup><br><u>EF lb/10<sup>6</sup> scf</u><br>BACT PM: 7.6<br>SO <sub>2</sub> : 0.6<br>CO: 84<br>NO <sub>x</sub> : 50<br>Formaldehyde: 7.50E-02<br>Selenium: 2.40E-05<br>POM: 8.82E-05 | None             | N/A                 | 3 kilns limited by throughput: 315 MMBF/yr<br>Each Kiln 18.5 MBF/hr x 3.8 lb VOC/MBF = lb VOC/hr<br>45 MMBtu/hr<br>Low NO <sub>x</sub> Burners<br>To convert from lb/10 <sup>6</sup> scf to lb/MMBtu divide by 1020.<br><sup>1</sup> Includes natural gas VOC |
| 01, 02, | Assume PM <sub>10</sub> = PM<br><br>NCDENR Wood Kiln Emission Calculation Factor Sheet for Softwood                                    | <u>Lb/MBF</u><br>BACT Limit:<br>PM/ PM <sub>10</sub> : 0.022<br><br>Acrolein: 0.0075<br>Methanol: 0.199<br>Formaldehyde: 0.0183  | None             | N/A                 | Lumber Drying Kilns<br>Max Annual Thruput = 315 MMBF/yr<br>Max Hourly Thruput = 18.5 MBF/hr @ SN-01, 02, and 03   |
| 04      | ADEQ Memo from CHurt to TRheaume dated   | <u>lb/ton log Thruput</u><br>BACT Limit PM: 0.02<br><br>PM <sub>10</sub> : 0.0004<br>(PM <sub>10</sub> = 2% PM)  | 95% <sup>1</sup> | Enclosed Hood       | 1,417,500 tpy<br>405 tph max Log Thruput @ 4.5 tons/MBF   |

| SN | Emission Factor Source (AP-42, testing, etc.)   | Emission Factor (lb/ton, lb/hr, etc.)  | Control Equip.   | Control Equip. Eff.         | Comments   |
|----|---|--|--|-----------------------------|--|
|    | 08/22/2003 and NC-DENR <sup>1</sup> TCEQ Wood Ind. EF, App A3   |  |  |                             |  |
| 05 | AP-42 Sec 10.3-1 <sup>1</sup> TCEQ Wood Ind. EF, App A3   | lb/ton log Throughput<br>BACT Limit PM: 0.35<br>PM <sub>10</sub> : 0.007<br>(PM <sub>10</sub> = 2% PM)   | 90% <sup>1</sup>   | Sawmill located in Building | 1,455,300 tpy<br>378 tph max log Thruput @4.2 tons/MBF |
| 06 | Cyclone Air flow rates and outlet grain loading based on January 2020 Renewal permit application.<br><br>Retesting is being required because of age of test and equipment (20 years). | Planer Mill -<br>EF based on air flow = 71,430 dscfm<br>outlet = 0.00004 gr/scf<br>PM <sub>10</sub> = PM<br>BACT PM: 0.004 gr/dscf = 0.02 lb/hr, 0.06 tpy<br>PM <sub>10</sub> : 0.02 lb/hr, 0.06 tpy | Cyclone + Baghouse Model #120 MCF 1120-750with DYNA-MAC Felt bags only | 99.99%                      |  |

| SN | Emission Factor Source (AP-42, testing, etc.)  | Emission Factor (lb/ton, lb/hr, etc.)   | Control Equip.           | Control Equip. Eff. | Comments  |
|----|--|---|--------------------------|---------------------|---|
| 08 | Cyclone<br>Air flow rates and outlet grain loading based on January 2020 Renewal permit application.<br><br>Retesting is being required because of age of test and equipment (20 years). | Truck Bin -<br>EF based on air flow = 7,500 dscfm<br>outlet = 0.002 gr/scf<br>PM: 0.02 lb/hr, 0.06 tpy<br>PM <sub>10</sub> : 0.02 lb/hr, 0.06 tpy   | Cyclone                  | N/A                 |   |
| 09 | AP-42<br>13.2.2.2.<br>Eq. 1a <sup>1</sup><br>(11/06) and<br>AP-42<br>13.2.2.1<br>Eq. 1 <sup>2</sup> (1/11)   | <u>'Haul Roads'</u><br>Unpaved <sup>1</sup><br>s: 8.4<br>W: varies<br>k: 4.9 (PM)<br>k: 1.5 (PM <sub>10</sub> )<br>k: 0.15 (PM <sub>2.5</sub> )<br>a: 0.70 (PM)<br>a: 0.90 (PM <sub>10</sub> & 2.5)<br>b: 0.45 and<br>Paved Roads <sup>2</sup><br>k: 0.011 (PM)<br>k: 0.0022 (PM <sub>10</sub> )<br>k: 0.00054 (PM <sub>2.5</sub> )<br>sL: 8.2<br>W: varies | Road<br>Watering<br>Plan | 90%                 | $E = k (s/12)^a \times (W/3)^b$<br>Eq 1a UNPAVED<br>where E = size-specific EF (lb/VMT)<br>s = surface material silt content (%)<br>W = mean vehicle wt. (tons)<br>M = surface mat 'l moisture content (%)<br>S = mean vehicle speed (mph)<br>C = EF for 1980's vehicle fleet exhaust, brake and tire wear.<br><br>$E = k (sL)0.91 \times (W)1.02$<br>Equation (1) PAVED<br>where:<br>E = PM emission factor (lb/VMT),<br>k = particle size multiplier<br>sL = road surface silt loading (g/m <sup>2</sup> ), and<br>W = ave wt. (tons) of vehicles traveling road. |

| SN | Emission Factor Source (AP-42, testing, etc.)                          | Emission Factor (lb/ton, lb/hr, etc.)   | Control Equip. | Control Equip. Eff. | Comments  |
|----|--|---|----------------|---------------------|---|
| 17 | AP-42, Table 3.3-1   | BACT PM: 0.2 g/kw-hr<br>PM <sub>10</sub> : 0.2 g/kw-hr<br><br><u>lb/hp-hr</u><br>SO <sub>2</sub> : 0.00205<br>BACT VOC: 4.0<br>CO: 3.5 g/kw-hr<br>NO <sub>x</sub> : 4.0 g/kw-hr<br>Acrolein: 9.25E-05<br>Formaldehyde: 1.18E-03 | None           | N/A                 | 'Emergency Fire Pump' – CI<br>RICE 200 bhp (from engine plate)<br>VOC = TOC<br><br>500 hrs/yr<br><br>7,000 Btu/hp-hr<br><br>1.40<br>MMBTU/hr<br><br>0.0015% sulfur<br>Diesel Fuel |
| 11 | AP-42 10.3-1   | <u>Lb/ton</u><br>BACT PM: 0.02<br>PM <sub>10</sub> : 0.00044 (incl 10% safety factor)   | None           | N/A                 | 'Material Processing' Fugitive emissions from Debarking and Chipping  |
| 12 | Pile handling – AP-42 13.2.4<br>Wind erosion - AP-42 13.2.5            | <u>Bark Pile PM (lb/hr)</u><br>Handling: 0.00015<br><u>Sawdust Pile (lb/hr)</u><br>Handling: 0.00012<br>Wind Erosion: 1.89<br>Sawdust Total: 1.90<br><u>Chip Pile PM (lb/hr)</u><br>Handling: 0.0015<br>Wind Erosion: 2.43      | None           | N/A                 | 'Storage Piles' By-product sold as dry material   |
| 13 | ADEQ Emission Factors outlined in 8/22/2003 memo from CHurt to TRheume | <u>Dried Shavings Lb/ton Storage</u><br>BACT PM: 0.0011<br>PM <sub>10</sub> : 0.00009<br><u>Loadout</u><br>BACT PM: 0.0022<br>PM <sub>10</sub> : 0.00018  | None           | N/A                 | 'Storage Bin' Based on permitted annual throughput Conservative estimate 75,000 tpy woodwaste generated   |
| 14 | TANKS 4.0.9d   | Oil   | None           | None                | 11 light color Tanks  |

| SN | Emission Factor Source (AP-42, testing, etc.)  | Emission Factor (lb/ton, lb/hr, etc.)                          | Control Equip. | Control Equip. Eff. | Comments            |
|----|--|--|----------------|---------------------|---------------------|
| 15 | TANKS 4.0.9d   | Diesel fuel  | None           | None                | 2 light color Tanks |
| 16 | TANKS 4.0.9d<br>HAP speciation factors from EPA document " <i>Gasoline Distribution Industry..</i> " | Gasoline<br><u>HAPs to VOC ratio by wt.</u><br>Total HAPs: 23% | None           | None                | 1 light color Tank  |

## 16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

| SN     | Pollutants | Test Method | Test Interval | Justification |
|--------|------------|-------------|---------------|---------------|
| 06, 08 | PM         | Method 5    | One time      | §19.702       |

## 17. 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 |  |                                    |           |              |

## 18. 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) |
|----------|--------------------------|--------------------------------------|-----------|--------------|
| Facility | Annual Lumber Throughput | Maximum 315 MMBF / rolling 12 months | Monthly   | Yes          |

| SN     | Recorded Item  | Permit Limit   | Frequency                                | Report (Y/N) |
|--------|--|--|--|--------------|
| 01, 02 | Combust only pipeline quality natural gas in burners   | Maintain valid gas tariff, purchase contract, fuel analysis or other appropriate documentation, or perform periodic testing  | On-going                                 | No           |
| 01, 02 | Develop, maintain, and follow a routine and repair maintenance and housekeeping Plan<br>BACT: Proper Maintenance and Operation | Record<br>1. Facility name and location.<br>2. Record the activity SN or description.<br>3. Date and time of maintenance or observation.<br>4. Maintenance activity performed, including replacement parts.<br>5. Name of person conducting the maintenance. | As performed                             | No           |
| 01, 02 | NESHAP Subpart DDDD  | Initial Notification §63.9(b)  | One-time                                 | Yes          |
| 04     | Annual Log Throughput<br>BACT: Hood Enclosure  | Maximum 1,417,500 tons / rolling 12 months   | Monthly                                  | Yes          |
| 05     | Annual Log Throughput<br>BACT: Building  | Maximum 1,455,300 tons / rolling 12 months   | Monthly                                  | Yes          |
| 06     | Performance Test with Baghouse   | PM: 0.016 lb/hr or 0.004 gr/dscf   | One-time                                 | Yes          |
| 08     | Performance Test with Cyclone  | PM: 0.073 lb/hr or 0.002 gr/dscf   | One-time                                 | Yes          |
| 06, 08 | Manufacturers' Operating Manuals and Maintenance Logs  | Must be operated and maintained in accordance with manufacturers'  | Keep Manual for Life of Unit(s) On-going | No           |

| SN | Recorded Item  | Permit Limit  | Frequency             | Report (Y/N) |
|----|--|---|-----------------------|--------------|
|    | BACT: Proper Maintenance and Operation                       | specs and good air pollution control and op practices for minimizing emissions. Must up-date maintenance logs on an as performed basis. Must operate at all times contiguous equipment is in operation. |                       |              |
| 09 | Road Watering Plan   | Maintain Road Watering Plan Records   | On-going              | No           |
| 09 | Road Dust (PM/PM <sub>10</sub> )                             | Keep dust from extending beyond property boundary   | On-going              | No           |
| 09 | If Dust Suppression Agent used, Maintain MSDS                | Shall contain no VOC, no HAP, no air contaminants   | Current, legible MSDS | No           |
| 17 | Total Operating Hours (emergency and non-emergency combined) | 500 Total Hours per calendar year   | Monthly               | No           |
| 17 | During Extended Emergency Use <i>in excess</i> of 500 hours  | No limit during Emergency   | If occurs             | Yes          |
| 17 | NESHAP Subpart ZZZZ  | Must be in compliance upon startup  | Monthly               | No           |
| 17 | Diesel Fuel  | Only ULSD fuel with the sulfur content no greater than 0.0015% sulfur   | Keep legible MSDS     | No           |

| SN       | Recorded Item   | Permit Limit  | Frequency        | Report (Y/N) |
|----------|---|---|------------------|--------------|
|          |   | by weight.  |                  |              |
| 17       | Good Combustion Practices                                 | Follow OEM manual   | As occurs        | No           |
| Facility | Permit Renewal Submit at least 6 months before expiration | Permit is valid for 5 years, beginning on date permit issued and ends five (5) years later, GP #3, unless renewal submitted 6 months prior to expiration date | Every 5 years    | Yes          |
| 11       | BACT: Wind barrier  | Keep barrier to prevent wind erosion  | On going         | No           |
| 12       | Storage Piles   | Keep dust down by wet suppression   | Daily, as needed | No           |
| 13       | Storage Bin   | Enclosed Bin for Transport  | On going         | No           |
| 14       | Oil Tanks   | Nte 14,788 gallons in 24-hours and nte 175,056 gallons of oil per rolling 12 months   | On going         | No           |
| 15       | Diesel Tanks  | Nte 1,000 gallons in 24-hours and nte 52,000 gallons of diesel per rolling 12 months  | On going         | No           |
| 16       | Diesel Tank   | Nte 9,000 gallons in 24-hours and nte 468,000 gallons of gasoline per rolling 12 months   | On going         | No           |

## 19. OPACITY:

| SN                         | Opacity | Justification for limit  | Compliance Mechanism  |
|----------------------------|---------|--|---|
| 01, 02                     | 5%      | §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 | Use natural gas fuel only   |
| 04, 05, 06, 08, 11, 12, 13 | 5%      | §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 | Weekly Observation  |
| 09<br>offsite              | 0%      | §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 | Annual ADEQ Observation   |
| 17                         | 20%     | §19.503 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 | Observation <i>if</i> fire pump runs 3 consecutive hours, otherwise none required |

## 20. GROUP A INSIGNIFICANT ACTIVITIES:

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

| Source Name                               | Group A Cat. | Emissions (tpy)     |                 |          |    |                 |        |       |
|---|--------------|---------------------|-----------------|----------|----|-----------------|--------|-------|
|   |              | PM/PM <sub>10</sub> | SO <sub>2</sub> | VOC      | CO | NO <sub>x</sub> | HAPs   |       |
|   |              |                     |                 |          |    |                 | Single | Total |
| 500 Gallon Gasoline Tank                  | A-13         |                     |                 | 0.13     |    |                 |        |       |
| Fire Pump Engine Diesel Tank – 260 Gallon | A-3          |                     |                 | 0.000135 |    |                 |        |       |
| Hydraulic Oil – 350 Gallon                | A-3          |                     |                 | 0.000135 |    |                 |        |       |
| Hydraulic Oil – 275 Gallon                | A-3          |                     |                 | 0.000135 |    |                 |        |       |
| Hydraulic Oil – 340 Gallon                | A-3          |                     |                 | 0.000135 |    |                 |        |       |
| Hydraulic Oil – 370 Gallon                | A-3          |                     |                 | 0.000135 |    |                 |        |       |
| Compressor Oil – 130 Gallon               | A-3          |                     |                 | 0.000135 |    |                 |        |       |
| Hydraulic Oil – 60 Gallon                 | A-3          |                     |                 | 0.000135 |    |                 |        |       |
| Hydraulic Oil – 100 Gallon                | A-3          |                     |                 | 0.000135 |    |                 |        |       |
| Hydraulic Oil – 160 Gallon                | A-3          |                     |                 | 0.000135 |    |                 |        |       |
| Hydraulic Oil – 130 Gallon                | A-3          |                     |                 | 0.000135 |    |                 |        |       |
| Lubricating Oil – 300 Gallon              | A-3          |                     |                 | 0.000135 |    |                 |        |       |
| Hydraulic Oil – 50 Gallon                 | A-3          |                     |                 | 0.00001  |    |                 |        |       |

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21. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

| Permit #    |
|-------------|
| 2348-AOP-R2 |

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 03-11-  
16

Facility Name: Resolute El Dorado Inc.

Permit Number: 2348-AOP-R3

AFIN: 70-00032

|               |           |                                   |       |
|---------------|-----------|-----------------------------------|-------|
| \$/ton factor | 27.27     | Annual Chargeable Emissions (tpy) | 685.8 |
| Permit Type   | Minor Mod | Permit Fee \$                     | 500   |

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) 0.4

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                |                              | 56.6       | 56.6       | 0                   | 0                               | 56.6                        |
| PM <sub>10</sub>  |                              | 12.8       | 12.8       | 0                   |                                 |                             |
| PM <sub>2.5</sub> |                              | 0          | 0          | 0                   |                                 |                             |
| SO <sub>2</sub>   |                              | 0.5        | 0.6        | 0.1                 | 0.1                             | 0.6                         |
| VOC               |                              | 599        | 599.2      | 0.2                 | 0.2                             | 599.2                       |
| CO                |                              | 48.9       | 48.9       | 0                   |                                 |                             |
| NO <sub>x</sub>   |                              | 29.3       | 29.4       | 0.1                 | 0.1                             | 29.4                        |
| Acrolein          | <input type="checkbox"/>     | 1.2        | 1.2        | 0                   |                                 |                             |
| Formaldehyde      | <input type="checkbox"/>     | 2.94       | 2.94       | 0                   |                                 |                             |
| Methanol          | <input type="checkbox"/>     | 31.35      | 31.35      | 0                   |                                 |                             |

|            |                          |       |       |   |  |  |
|------------|--------------------------|-------|-------|---|--|--|
| POM        | <input type="checkbox"/> | 0.01  | 0.01  | 0 |  |  |
| Selenium   | <input type="checkbox"/> | 0.01  | 0.01  | 0 |  |  |
| Total HAPs | <input type="checkbox"/> | 46.31 | 46.31 | 0 |  |  |