

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2473-A AFIN: 32-00684

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

American Stave Company, LLC - Independent Stave Company-Batesville Mill
220 Johnson Hollow Road
Locust Grove, Arkansas 72550

3. PERMIT WRITER:

Jesse Smith

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Wood Product Manufacturing
NAICS Code: 321

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
2/27/2023	New	All Sources

6. REVIEWER'S NOTES:

American Stave Company, LLC is proposing to construct a stave manufacturing mill in the city of Batesville. This is the initial air permit for this facility and adds all permitted sources. Permitted emissions for this initial permit are 65.8 tpy PM, 49.1 tpy PM₁₀, 0.1 tpy SO₂, 0.2 tpy VOC, 0.3 tpy CO, 0.2 tpy NO_x, and 0.01 tpy Total HAP.

7. COMPLIANCE STATUS:

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

This is the initial permit for this facility.

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? N

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

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-20	PM, CO, NO _x	NSPS III

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.)

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:

Based on Division of Environmental Quality 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 Y
 If exempt, explain: No H₂S emissions

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01, 11, 12	Webfire SCC 30700801	<u>Lb/ton</u> 0.020 PM 0.011 PM ₁₀	Cyclone	90%	
02, 03, 04, 05, 06, 07, 08, 09, 10	Webfire SCC 30700802	0.350 lb/ton PM	Cyclone	80%	
	May 8, 2014 EPA Memo	0.175 lb/ton PM ₁₀		40%	
13	DEQ 2003 Memo	<u>Lb/ton</u> 0.0044 PM 0.00034 PM ₁₀	-	-	
14	DEQ 2003 Memo	<u>Lb/ton</u> 0.0022 PM 0.00018 PM ₁₀	-	-	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
15	DEQ 2003 Memo	<u>Lb/ton</u> 0.0008 PM 0.00008 PM ₁₀	-	-	
16	AP-42 Section 13.2.1	K=0.011(PM) K=0.0022(PM ₁₀) K=0.00054(PM _{2.5}) sL=7.4 P=105 N=365	-	-	
17	AP-42 Section 13.2.2	S=8.4 K=4.9(PM) K=1.5(PM ₁₀) K=0.15(PM _{2.5}) A=0.70(PM) A=0.9(PM ₁₀ /PM _{2.5}) B=0.45 P=105			
18, 19	May 8, 2014 EPA Memo	<u>Ton/acre-yr</u> 0.380 PM 0.190 PM ₁₀	-	-	
20	NSPS III Table 4	<u>Lb/hp-hr</u> 0.001 PM 0.001 PM ₁₀ 0.008 VOC 0.008 CO 0.008 NO _x	-	-	
	AP-42 Table 3.3-1	<u>Lb/hp-hr</u> 0.002 SO ₂			

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

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	Throughout	175,200 tons of logs	Monthly	N
20	Hours of Operation	500 hours	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01 through 19	20%	Rule 18.501	Inspector observation
20	5%	Rule 18.501	Inspector observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

21. 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	
Diesel Storage Tank	A-3			0.001					

Permit #: 2473-A

AFIN: 32-00684

Page 6 of 6

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
N/A

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

American Stave Company, LLC -
 Independent Stave Company-
 Batesville Mill
 Permit #: 2473-A
 AFIN: 32-00684

			Old Permit	New Permit
\$/ton factor	27.27	Permit Predominant Air Contaminant	0	65.8
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	<u>1794,366</u>	
		Annual Chargeable Emissions (tpy)	<u>65.8</u>	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0	65.8	65.8
PM ₁₀	0	49.1	49.1
PM _{2.5}	0	0	0
SO ₂	0	0.1	0.1
VOC	0	0.2	0.2
CO	0	0.3	0.3
NO _x	0	0.2	0.2
Single HAP	0	0.01	0.01
Total HAP	0	0.01	0.01