STATEMENT OF BASIS

For the issuance of Air Permit # 2496-A AFIN: 26-01829

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

FiberPro LLC
2727 East Grand Avenue
Hot Springs, Arkansas 71901

3. PERMIT WRITER:

Sterling Powers

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Sawmill, Woodworking, and Paper Machinery Manufacturing
NAICS Code: 333243

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
07/29/2024	New	Paint Booth and Welding Operations

6. REVIEWER'S NOTES:

FiberPro, LLC is a manufacturer of log and lumber handling machinery in Hot Springs, AR. They requested an initial minor source air permit on July 29th, 2024. This initial air permit included two sources, SN-01 (Paint Booth) and SN-02 (Welding Operations).

Permitted emissions 1.7 tpy PM_{10}, 18.5 tpy VOC, 1.7 tpy PM, and 24.1 tpy Total HAPs.

Concerning 40 C.F.R. Subpart XXXXXX:

Per the relevant guidance from EPA concerning the implementation of NESHAP 6X, the preamble to the rule is to be used as a guide to determine the scope of industries to which the rule applies. The category listed in the rule text which is closest in description to FiberPro operations is "industrial machinery and equipment finishing operations" which had the mention of "forestry equipment." The preamble lists relevant NAICS codes to this description (333120, 333123, and 333911) and NAICS code 333243 (described in brief as manufacturing of equipment to support wood products manufacturing) under which the site operates is not a listed code.

Of the listed NAICS codes listed, NAICS 333120 is the one that would potentially include what Table 1 of Subpart XXXXXX describes as "forestry equipment," referred to with the NAICS code description as "logging equipment." This category includes only machinery that is used in the "construction industry" and not in reference to back-end processing operations at a subsequent location, which by contrast is classified as "wood products manufacturing," which occurs at Fiberpro. Therefore, Subpart XXXXXX does not apply.

7. COMPLIANCE STATUS:

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

No enforcement actions are active/pending.

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*

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-01	PM/PM_{10}	NSPS
SN-02	HAPs	NESHAP

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. 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 DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Ethylbenzene	434.0	47.74	14.34	Y
Methanol	262.08	28.82	24.38	Y
Methyl Isobutyl Ketone	205.0	22.55	28.73	Y
Methyl methacrylate	205.0	22.55	0.78	Y
Methyl Ethyl Ketone	590.0	64.9	53.78	Y
Naphthalene	52.0	5.72	0.54	Y
Toluene	188.0	20.7	41.53	Y
Xylene	434.0	47.7	78.62	Y
Acetone	594.0	65.34	7.88	Y
Hexamethylene-di-Isocyanate	0.035	0.00385	0.52	Y*
Chromium	0.01	0.0011	0.0000141	Y

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Cobalt	0.02	0.0022	0.00000706	Y
Manganese	0.02	0.0022	0.0926	N
Nickel	1.5	0.165	0.0000282	Y

*Considered to be polymerized and not emitted. This calculation for information only and is not in the summation of Total HAPs.

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 Division of Environmental Quality to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Manganese	0.2	0.18	Y

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	SDS Sheets for VOC	Macropoxy VOC Content: 3.12 lb/gal Acrolon White VOC: 3.688 lb/gal Acrolon Clear VOC: 3.52 lb/gal Pitthane Comp VOC: 2.00 lb/gal Thinner VOC: 7.28 lb/gal Macropoxy PM: 10.95 lb/gal Acrolon White PM: 11.22 lb/gal Acrolon Clear PM: 10.62 lb/gal Pitthane Comp: 10.36 lb/gal Thinner PM: 0	Particulate Filter for PM	PM: 90%	Assume 100% VOC content and highest density thinner used on site and highest mixed VOC content of thinner and coating Throughput: 30 gal/hr Annual usage: 10,000 gal/yr 2000 hours/yr operation Assumed Paint Transfer to Metal: 75%
02	AP-42 Chapter 12.19 Electric Arc Welding for E71T electrodes	PM/PM10: 12.2 lb/1000 lb electrode Chromium: 0.02 lb / 1000 lb electrode Cobalt:0.01 lb / 1000 lb electrode Manganese: 6.62 lb / 1000 lb electrode Nickel: 0.04 lb / 1000 lb electrode	-	-	2000 hours/yr operation Electrode consumed: 27,990 lb/yr

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

15. 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)
01	Paint Usage	10,000 gal / rolling 12 months	Monthly	N
	VOC Content of Paint Usage	3.8 lb/gal VOC Content, usage tracked	Monthly	N
	Thinner/Solvent Usage	TLV above 1 mg/m3, usage tracked	Monthly	N
02	Welding Wire Used	27,990 lb used per rolling 12 months	Monthly	N
	Total hours of welding	no more than 2000 hours / yr	Monthly	N
	Time of Day Welding Occurred	Welding operations shall only occur between the hours of 6 am and 6 pm	Monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
N/A			

17. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

18. 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
Burn Table	A-13	3.44					0.33	0.33
CNC Machine	A-13	0.38						
Total		3.82					0.33	0.33

19. 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

Facility Name: Fiberpro LLC

Permit Number: 2496-A

AFIN: 26-01829

			Old Permit	New Permit
$/ton factor	28.14	Permit Predominant Air Contaminant	0	24.1
Minimum Fee $	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee $	500			
		Permit Fee $	678.174	
Check if Administrative Amendment	☐	Annual Chargeable Emissions (tpy)	24.1	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0	1.7	1.7
PM_{10}	0	1.7	1.7
$PM_{2.5}$	0	0	0
SO_2	0	0	0
VOC	0	18.5	18.5
CO	0	0	0
NO_X	0	0	0
Total HAPs	0	24.1	24.1