

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1675-AR-8 AFIN: 70-00068

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Anthony Forest Products Company, LLC (Laminating Plant)
256 Cooper Drive
El Dorado, Arkansas 71730

3. PERMIT WRITER:

Andrea Sandage

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Engineered Wood Member (except Truss) Manufacturing
NAICS Code: 321213

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
12/14/2018	Deminimis	New gluing formula resulting in increase of VOC and HAPs

6. REVIEWER'S NOTES:

Anthony Forest Products Company, Laminating Plant ("Lam Plant"), located in El Dorado, Union County, Arkansas, produces laminated beams and laminated logs for use in building construction. With this de minimis application, the facility proposes to revise the permit limitations for the gluing operations (SN-04) to reflect a new proposed glue mixture to be used in the gluing operations. HAP emissions were also added for a previously permitted source (SN-06).

Emissions plant-wide changed as follows: VOC increased by 4.5 tpy, Formaldehyde decreased by 0.02 tpy, Methanol increased by 1.31 tpy, Total HAPs increased by 1.40 tpy and Acetone increased by 0.1 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 facility was inspected on January 8, 2016. The facility has no current or pending compliance or enforcement issues.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? **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-01	HAP	NESHAP DDDD
SN-06	HAP	NESHAP CCCCC

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. 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:

The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

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/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Lead*	0.05	0.006	0.001	Yes

*Unchanged at R8. Screening was performed at R7.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	AP-42 Idaho DEQ factors for low temp pine drying	<u>lb/MMBF:</u> PM/PM ₁₀ : 0.022 VOC: 3.8 Methanol: 0.035 Phenol: 0.01 Formaldehyde: 0.0027 Acetaldehyde: 0.042 Acrolein: 0.0017	N/A	N/A	
02	Utah DEQ factor for baghouses	0.016 gr/scf	Baghouse	Bvc cN/A	41,906 CFM reported; 7,000 gr/lb, 60 op min/hr, 8,760 op hr/yr
03	Utah DEQ factor for baghouses	0.016 gr/scf	Baghouse	N/A	37,332 CFM reported; 7,000 gr/lb, 60 op min/hr, 8,760 op hr/yr
04	Worst Case (% volatilized)	VOC 0.66% Acetone 0.003% Formaldehyde 0.028% Methanol 0.58% Acetaldehyde	N/A	N/A	Emissions rates derived from lab testing or interpolation. Max Throughput – 17.6 MBf/hr; 54,750 MBf/yr Max average glue usage Annual - 38.5 lb/MBf; Hourly - 50.63 lbs/MBf

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		0.0037%			20% safety factor included
06	Tanks	345.5 lb/yr	N/A	N/A	HAPs based on VOC ratio derived from "EPA Emission Estimation Protocol for Petroleum Refineries", Table 3-3

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

14. 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				

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)
Plant-wide	Board feet of product processed	54,750,000 board feet per year	Monthly	N
SN-04	Usage and air contaminant content of each glue containing air contaminants	See SC #8	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN-04	Hours of operation per month	See SC #2 and #8	Monthly	N
SN-06	Gallons of gasoline used per month	10,000 gallons per month; 50,000 gallons per rolling 12-month	Monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01	5%	Department Guidance	Visual Inspection
02	5%	Department Guidance	Visual Inspection
03	5%	Department Guidance	Visual Inspection

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
Grade Line Building Heater Dry Kiln (2.2MMBtu/hr)	A-1	0.08	0.01	0.06	0.38	0.89	0.02	0.02
SN-07 Diesel Storage Tank (500 gal)	A-3	-	-	0.01	-	-	-	-
SN-05 Loadout Operations from Wood	A-13	0.02	-	-	-	-	-	-

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
waste Storage Bin								
Parts Washer	A-13	-	-	0.17	-	-	-	-

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 #
1675-AR-7

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Anthony Forest
 Products Company (Laminating Plant)
 Permit Number: 1675-AR-8
 AFIN: 70-00068

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	48.1	48.1
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	48.1	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	48.1	48.1	0
PM ₁₀	48.1	48.1	0
PM _{2.5}	0	0	0
SO ₂	0.1	0.1	0
VOC	37.5	42	4.5
CO	1.2	1.2	0
NO _x	1.4	1.4	0
Formaldehyde	0.35	0.33	-0.02
Methanol	5.13	6.44	1.31
Total HAP	6.01	7.41	1.4
Acetone	0	0.1	0.1