

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1675-AR-9 AFIN: 70-00068

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

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

3. PERMIT WRITER:

Shawn Hutchings

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
9/14/2021	Deminimis	New Fire Pump Engine, Insignificant Diesel Tank

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. This permit is a de minimis permit to add a Diesel Fire Pump Engine, SN-10 and a diesel tank to the insignificant activity list under category A-3. Permitted emission rates increased 0.1 tpy of particulate, 0.2 tpy of SO₂ and VOC, 0.3 tpy of CO and NO_x, and 0.01 tpy of HAPs.

7. COMPLIANCE STATUS:

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

There are no known enforcement actions against the 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*

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	HAP	NESHAP DDDD
SN-06	HAP	NESHAP CCCCCC
SN-10	Criteria/HAP	NSPS III, MACT 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
None				

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 Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? **N**
 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.

Source	Inapplicable Regulation	Reason
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Source	Inapplicable Regulation	Reason
N/A		

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/N

If exempt, explain: _____

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H ₂ S	20 parts per million (5-minute average*)		
	80 parts per billion (8-hour average) residential area		
	100 parts per billion (8-hour average) nonresidential area		

*To determine the 5-minute average use the following equation

$$C_p = C_m (t_m/t_p)^{0.2} \text{ where}$$

C_p = 5-minute average concentration

C_m = 1-hour average concentration

t_m = 60 minutes

t_p = 5 minutes

15. 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%	N/A	N/A	Emissions rates derived from lab testing or interpolation.

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		Formaldehyde 0.028% Methanol 0.58% Acetaldehyde 0.0037%			Max Throughput – 17.6 MBf/hr; 54,750 MBf/yr Max average glue usage Annual - 38.5 lb/MBf; Hourly - 50.63 lbs/MBf 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
10	AP-42 and NSPS limits	Varied	N/A	N/A	

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)
Plant-wide	Board feet of product processed	54,750,000 board feet per year	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN-04	Usage and air contaminant content of each glue containing air contaminants	See SC #8	Monthly	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
SN-10	Hours of Operation	100/500 per 12/month	Monthly	N
SN-10	Back Pressure Alarm	None	As need	N

19. 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
10	20%	Department Guidance	Visual Inspection

20. DELETED CONDITIONS:

Former SC	Justification for removal
	None

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
Grade Line Building	A-1	0.08	0.01	0.06	0.38	0.89	0.02	0.02

Heater Dry Kiln (2.2MMBtu/hr)								
Diesel Tank (200 gal)	A-3			0.01				
SN-07 Diesel Storage Tank (500 gal)	A-3	-	-	0.01	-	-	-	-
SN-05 Loadout Operations from Wood waste Storage Bin	A-13	0.02	-	-	-	-	-	-
Parts Washer	A-13	-	-	0.17	-	-	-	-

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 #
1675-AR-8

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

