

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1681-AOP-R17 AFIN: 70-00473

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Anthony Forest Products Company, LLC
1236 Urbana Road
El Dorado, Arkansas 71730

3. PERMIT WRITER:

Alexander Sudibjo

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 (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
10/29/2018	Minor Mod	New DPK #2 and abort stack

6. REVIEWER'S NOTES:

With this minor modification, the facility is removing the existing direct fired dual path lumber kiln, DPK #2 (SN-14), and associated abort stack (SN-24) that burned down in August. The facility is also installing a new direct fired dual path lumber kiln, DPK #2 (SN-30), and abort stack (SN-31). SN-30 has a drying capacity of 11.9 MBf/hr and will have a production limit of 93.5 MMBf/yr. There are no changes to the facility's permitted annual emissions.

7. COMPLIANCE STATUS:

The facility was last inspected on November 15, 2017. No violations were found during the inspection. ECHO shows an unknown compliance status (<https://echo.epa.gov/detailed-facility-report?fid=110001702346>).

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/A

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

- *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. The facility used a hybrid of actual-to-projected-actual test to account for the removal of SN-14 and SN-24 and an actual-to-potential test for the addition of SN-30 and SN-31. The emission increases determined by the hybrid test are lower than the PSD significant emission rate for all PSD regulated pollutants.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	-	40 CFR Part 63, Subpart DDDD
26	-	40 CFR Part 60, Subpart IIII
26	-	40 CFR Part 63, Subpart ZZZZ
27 and 28	VOC	PSD

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N/A

(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?
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
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 ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

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/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Lead	0.05	5.50E-03	5.41E-03	Yes
Acrolein	0.229	0.025	0.321	No
Formaldehyde	0.368	0.04	1.27	No
Methanol	262.1	28.83	4.64	Yes
Pentachlorophenol	0.5	0.055	5.75E-06	Yes
Antimony	0.5	0.055	8.91E-04	Yes
Arsenic	0.01	1.10E-03	2.48E-03	No
Beryllium	5.00E-05	5.50E-06	1.24E-04	No
Cadmium	0.01	1.10E-03	4.62E-04	Yes
Chromium	0.5	0.055	2.37E-03	Yes
Chromium VI	0.01	1.10E-03	3.03E-04	Yes

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Cobalt	0.02	2.20E-03	7.33E-04	Yes
Manganese	0.1	0.011	0.18	No
Mercury	0.01	1.10E-03	3.95E-04	Yes
Phosphorus	0.1	1.10E-03	3.05E-03	Yes
Selenium	0.2	2.20E-03	3.16E-04	Yes

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 Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL (µg/m ³) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m ³)	Pass?
Acrolein	2.292	1.007	Yes
Formaldehyde	15	5.363	Yes
Arsenic	0.1	0.0092	Yes
Beryllium	5.00E-04	4.58E-04	Yes
Manganese	1.0	0.666	Yes

c) H₂S Modeling:

The facility does not have any H₂S emissions.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
06 Debarking	AP-42, 10.1 TCEQ Wood Industry Emission Factors – Log Debarking Controls (Appendix A7)	PM = 0.024 lb/ton PM ₁₀ = 11% of PM PM _{2.5} = 50% of PM ₁₀	Partial building enclosure	95%	920,000 ton/yr 225 ton/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
06 Sawing	AP-42 10.1 TCEQ Wood Industry Emission Factors – Sawing Controls (Appendix A7)	PM = 0.35 lb/ton PM ₁₀ = 11% of PM PM _{2.5} = 50% of PM ₁₀	Building Enclosure	90%	874,000 ton/yr 225 ton/hr
20	AP-42, 13.2	17 paved sections 2 unpaved sections	Wet Suppression	50%	Logs = 920,000 ton/yr By-product (shavings) = 50,600 ton/yr By-product (other) = 266,800 ton/yr Finished Lumber = 254,656 ton/yr
21	Vendor	0.01 grain/scf 42,800 cfm 7000 grain/lb PM ₁₀ = 40% of PM PM _{2.5} = 50% of PM ₁₀	Cyclone and Baghouse	Cyclone 94% & Baghouse 99.9%	3600 hr/yr
23, 27, 30 Biomass	ADEQ Memo (10/31/2014)	VOC = 3.8 lb/MBF	-	-	<u>SN-23</u> 25 MMBtu/hr 8.2 MBF/hr 71,610 MBF/yr 219,000 MMBtu/hr 2.9 tons sawdust/hr
	NCDENR Wood Kiln Emission Calculator	PM/PM ₁₀ /PM _{2.5} = 0.143 lb/MBF Acetaldehyde = 0.052 lb/MBF Acrolein = 0.0075 lb/MBF Methanol = 0.161 lb/MBF Phenol = 0.01 lb/MBF			<u>SN-27</u> 31.5 MMBtu/hr 8.7 MBF/hr 75,000 MBF/yr 275,940 MMBtu/hr 3.6 tons sawdust/hr
	NCASI Special Report 08-01, May 2008	Formaldehyde = 0.04 lb/MBF			<u>SN-30</u> 30 MMBtu/hr 11.9 MBF/hr 93,500MBF/yr 262,800 MMBtu/hr 3.4 tons sawdust/hr
	AP-42, 1.6	SO ₂ = 0.025 lb/MMBtu CO = 0.6 lb/MMBtu Various HAPs			
	GHG Mandatory Reporting Rule	CO ₂ = 206.7352 lb/MMBtu CH ₄ = 0.0158688 lb/MMBtu N ₂ O = 0.007934 lb/MMBtu			
27 Natural Gas	AP-42, 1.4	NO _x = 0.27 lb/MMBtu Various HAPs	-	-	31.6 MMBtu/hr
25, 28, 31 Diesel Fuel	AP-42, 1.3	SO ₂ = 7.1 lb/1000 gal NO _x = 20 lb/1000 gal CO = 5 lb/1000 gal PM = 2 lb/1000 gal VOC = 1.1 lb/1000 gal	-	-	Max diesel usage 15 gal/hr 360 gal/yr
25, 28, 31 Sawdust	AP-42, 1.6	PM = 0.33 lb/MMBtu PM ₁₀ = 0.29 lb/MMBtu	-	-	8.8 MMBtu/hr 4382 Btu/lb

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		PM _{2.5} = 0.29 lb/MMBtu SO ₂ = 0.025 lb/MMBtu NO _x = 0.22 lb/MMBtu CO = 0.6 lb/MMBtu VOC = 0.017 lb/MMBtu Various HAPs			2000 lb/hour Max duration of startup = 24 hours Max 12 startups per kiln in a year Max hours of operation = 288 hour/yr per kiln
	GHG Mandatory Reporting Rule	CO ₂ = 206.7352 lb/MMBtu CH ₄ = 0.0158688 lb/MMBtu N ₂ O = 0.007934 lb/MMBtu			
26	NSPS III Tier 3 Limit	PM/PM ₁₀ = 0.15 g/bhp-hr NO _x = 3.0 g/bhp-hr CO = 2.6 g/bhp-hr	-	-	175 bhp 1.47 MMBtu/hr 500 hr/yr
	AP-42, 3.3-2	VOC = 0.36 lb/MMBtu SO ₂ = 0.29 lb/MMBtu Various HAPs			

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
23 (DPK#1) 30 (DPK#2)	PM ₁₀	5	Test only one kiln every five years (alternating schedule)	Dept. Guidance (Test for Emission Verification)
	CO	10	Test only one kiln every five years (alternating schedule)	
27 (DPK#3)	PM ₁₀	201/201A	One time	Dept. Guidance (Test for Emission Verification)
	CO	10		

15. 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				

16. 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)
06	Logs debarked	920,000 tons per consecutive 12 months	Monthly	Y
	Logs sawed	874,000 tons per consecutive 12 months	Monthly	Y
20	Wet Suppression Application	As needed to control visible emissions from traffic	As needed but no less than once a month	N
	Products Transported	<u>in tons of product per consecutive 12 months</u> Logs: 920,000 By-Products (Shavings): 50,600 By-Products (Others): 266,800 Finished Lumber: 254,656	Monthly	Y
21	Planer Mill Hours of Operation	3,600 hours per consecutive 12 months	Monthly	Y
23 & 25	Lumber Throughput	71.61 MMBF per consecutive 12 months	Monthly	Y
	Sawdust throughput limit for gasifier/burner	25,000 tons per consecutive 12 months	Monthly	Y
27 & 28	Lumber Throughput	75.0 MMBF per consecutive 12 months	Monthly	Y
	Sawdust throughput limit for gasifier/burner	31,500 tons per consecutive 12 months	Monthly	Y
30 & 31	Lumber Throughput	93.5 MMBF per consecutive 12 months	Monthly	Y
	Sawdust throughput limit for gasifier/burner	29,986 tons per consecutive 12 months	Monthly	Y
25	Diesel fuel usage limit as starter fluid	360 gallons per consecutive 12 months	Daily when in startup	N
	Abort stack operating hours	288 hours per consecutive 12 months	Monthly	Y
	Sawdust throughput limit	2000 lb of sawdust per hour	Daily when in startup	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	for gasifier/burner			
28	Diesel fuel usage limit as starter fluid	360 gallons per consecutive 12 months	Daily when in startup	N
	Abort stack operating hours	288 hours per consecutive 12 months	Monthly	Y
	Sawdust throughput limit for gasifier/burner	2000 lb of sawdust per hour	Daily when in startup	N
31	Diesel fuel usage limit as starter fluid	360 gallons per consecutive 12 months	Daily when in startup	N
	Abort stack operating hours	288 hours per consecutive 12 months	Monthly	Y
	Sawdust throughput limit for gasifier/burner	2000 lb of sawdust per hour	Daily when in startup	N
26	Hours of Operation	500 hours per calendar year	Monthly	Y

17. OPACITY:

SN	Opacity %	Justification for limit	Compliance Mechanism
06	20	Reg.19.503	Weekly observation
20	5	Reg.18.501	Weekly observation
21	5	Reg.18.501	Monthly observation
23, 27, 30	20	Reg.19.503	Weekly observation
25, 28, 31	20	Reg.19.503	Observation during Startup
26	20	Reg.19.503	Daily Observation when use exceeds 24-hours per event

18. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

19. 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
Bark storage pile	A-13	0.95	0.47						
Sawdust storage pile	A-13	1.08	0.54						
Boiler ash (Biochar) storage Pile	A-13	1.44	0.72						
Chip Overflow Pile	A-13	0.83	0.41						
Planer Mill Woodwaste storage bin	A-13	0.083	0.007						
Fuel Storage Silo	A-13	0.143	0.012						
Chip Storage Bin	A-13	0.132	0.013						
1,000 Gasoline tank	A-13				0.67				
Parts Washer	A-13				0.01				
Planer Mill Trim Cyclone	A-13	0.27	0.27						
A-13 Total		4.928	2.442		0.68				
240 gallon diesel tank	A-2				0.01				
500 gallon diesel tank	A-3				0.01				
1000 gallon diesel tank	A-3				0.01				
1000 gallon diesel tank	A-3				0.01				

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1681-AOP-R16

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Anthony Forest Products Company
 Permit Number: 1681-AOP-17
 AFIN: 70-00473

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	622.7
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

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		63.5	63.5	0	0	63.5
PM ₁₀		28	28	0		
PM _{2.5}		0	0	0		
SO ₂		10.1	10.1	0	0	10.1
VOC		456.8	456.8	0	0	456.8
CO		230.1	230.1	0		
NO _x		92.3	92.3	0	0	92.3
Lead	<input type="checkbox"/>	1.84E-02	1.84E-02	0		

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