

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1862-AOP-R3 AFIN: 52-00247

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Camden Timbers, LLC  
111 Ouachita 301  
Camden, Arkansas 71701

3. PERMIT WRITER:

Bart Patton

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
12/13/2022	Minor Modification	Add SN-21; Add associated diesel fuel tank as A-3 I.A.

6. REVIEWER’S NOTES:

Camden Timbers, LLC (formerly Victory Lumber, LLC) operates a chipmill and sawmill in Camden, Arkansas, located at 111 Ouachita County Road 301 in Ouachita County.

The following changes were made in this minor modification:

- Add SN-21, an emergency diesel-fired fire pump engine
- Add an associated 300-gallon diesel fuel tank as a category A-3 Insignificant Activity

The permit was updated to use current standard language.

Annual emissions increased as follows: 0.1 tpy, PM/PM<sub>10</sub>; 0.2, SO<sub>2</sub>; 0.2, VOC; 0.4, CO; 0.4, NO<sub>x</sub>; 0.01, Acrolein; 0.01, Formaldehyde; and 0.01, Total Other HAP.

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 last inspected on October 25, 2021. No violations were found during the inspection.

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? 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-21	VOC, NO <sub>x</sub>	NSPS III
	HAPs	NSPS ZZZZ

As of permit #1862-AOP-R2, SN-08 was no longer a major source of HAPs and therefore is not subject to 40 C.F.R. Part 63, Subpart DDDD—*National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*.

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

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

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

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
None		

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:

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

The screening for non-criteria pollutants was unchanged at R3. Emissions from SN-21 were not included in the screening below because SN-21 is an emergency engine.

At R3, the permit limit for Total Other (non-speciated) HAPs is 10.55 tpy. While the permit does not mention the composition of this group of HAPs, the largest non-speciated HAP is methanol, at 7.2 tpy, entirely from SN-08. (SN-21, added in this revision, does not contribute any methanol emissions according to AP-42 factors.) If methanol limits are increased in a future permit revision, the annual methanol limit should be evaluated against the 10.0 tpy limit of a single HAP for an area source of HAPs to become a major source of HAPs.

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value ( $\text{mg}/\text{m}^3$ ), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV ( $\text{mg}/\text{m}^3$ )	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Methanol	262.086	28.829	1.64	Yes
Formaldehyde	0.368	0.041	0.64	No
Acrolein	0.23	0.025	0.04	No
Pentachlorophenol	0.5	0.055	1.61E-06	Yes
Antimony	0.5	0.055	2.49E-04	Yes
Arsenic	0.01	0.0011	6.93E-04	Yes
Beryllium	5.0e-5	5.50e-6	3.47E-06*	Yes
Cadmium	0.002	2.20e-4	1.29E-04	Yes
Chromium	0.01	0.0011	6.62E-04	Yes
Chromium VI	0.01	0.0011	1.10E-04	Yes
Cobalt	0.02	0.0022	2.05E-04	Yes
Lead	0.05	0.0055	1.51E-03	Yes
Manganese	0.02	2.20e-3	5.04E-03*	No
Mercury	0.01	0.0011	1.10E-04	Yes
Nickel	0.1	0.011	1.04E-03	Yes
Phosphorus	0.1	0.011	8.51E-04	Yes
Selenium	0.2	0.022	8.82E-05	Yes

\* lb/hr value for manganese and beryllium includes 90% control efficiency from wet scrubbing.

2<sup>nd</sup> 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 ( $\mu\text{g}/\text{m}^3$ ) = 1/100 of Threshold Limit Value	Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	Pass?
Formaldehyde	15	1.59	Yes
Acrolein	2.3	0.091	Yes
Manganese	0.2	0.013	Yes

c) No other modeling was required.

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
02	TCEQ Wood Industry	PM: 0.024 lb/ton PM <sub>10</sub> : 0.011 lb/ton PM <sub>2.5</sub> : 0.006 lb/ton	-	-	550,000 tpy 275 tph
03	TCEQ Wood Industry	<u>Sawing process</u> PM: 0.35 lb/ton PM <sub>10</sub> : 0.2 lb/ton PM <sub>2.5</sub> : 0.0875 lb/ton	Inside Building	90%	550,000 tpy 275 tph
		<u>Sawing process</u> PM: 0.5 lb/ton PM <sub>10</sub> : 0.425 lb/ton PM <sub>2.5</sub> : 0.25 lb/ton	Moisture Content of Chips	50%	40% of logs assumed as chips
08	ADEQ Memo	VOC: 3.8 lb/MBF	-	-	
	GA EPD Emission Factors	<u>In lb/MBF</u> PM: 0.14 PM <sub>10</sub> : 0.104 PM <sub>2.5</sub> : 0.099 SO <sub>2</sub> : 0.025 CO: 0.73 NO <sub>x</sub> : 0.28	-	-	80,000 MBF/yr 9.1 MBF/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	US EPA PCWP MACT Memo	<u>In lb/MBF</u> Methanol: 0.18 Phenol:0.01 Formaldehyde: 0.07 Acetaldehyde: 0.04 Acrolein: 0.004 Propionaldehyde: 0.01	-	-	
	AP-42 1.6	Various HAPs	Wet Scrubber	90% (Beryllium, Manganese)	31.5 MMBtu/hr
10	Manufacturer's info & EPA	PM: 0.082 gr/scf PM <sub>10</sub> : 85% PM PM <sub>2.5</sub> : 50% PM	-	-	18,750 cfm
14	TCEQ Wood Industry	PM: 0.024 lb/ton PM <sub>10</sub> : 0.011 lb/ton PM <sub>2.5</sub> : 25% PM	-	-	153,000 tpy 61.2 tph Emissions are doubled for the source b/c the logs are debarked then chipped
20	AP-42 13.2.2	PM: 10.374 lb/VMT PM <sub>10</sub> : 2.957 lb/VMT PM <sub>2.5</sub> : 0.29 lb/VMT	Watering	90% PM/PM <sub>10</sub>	27,555.2 miles/yr 13.76 miles/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
21	<p>Tier 3 stds, NSPS III Table 4</p> <p>AP-42, Table 3.3-1 diesel fuel, exhaust and crankcase</p> <p>AP-42, Table 3.3-2</p>	<p><u>lb/hp-hr:</u> PM 3.31E-4 CO 5.73E-3 NO<sub>x</sub> + NMHC 6.61E-3</p> <p><u>lb/hp-hr:</u> SO<sub>2</sub> 2.05E-3 TOC (VOC) 2.5141E-3</p> <p><u>lb/MMBtu:</u> Acrolein 9.25E-5 Largest Single HAP (Formaldehyde) 1.18E-3 Total HAP 3.87E-3</p>	None	N/A	<p>237 hp x 7000 Btu/hp-hr x 1E6 Btu/MMBtu = 1.659 MMBtu/hr.</p> <p>PM<sub>10</sub> and PM<sub>2.5</sub> assumed to be PM.</p> <p>NO<sub>x</sub> plus NMHC assumed to be 100% NO<sub>x</sub> for the NO<sub>x</sub> calculation.</p> <p>500 op hr max/yr.</p>

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)
02	Logs Processed	550,000 tons per rolling 12-month period	Monthly	Y
03	Logs Processed	550,000 tons per rolling 12-month period	Monthly	Y
08	Lumber Processed	80 million board feet per rolling 12-month period	Monthly	Y
10	Lumber Processed	80 million board feet per rolling 12-month period	Monthly	Y
14	Logs Processed	153,000 tons per rolling 12-month period	Monthly	Y
21	Hours of Operation	500 hours per rolling 12-month period	Monthly	Y
	Maintenance Hours of Operation	100 hours per rolling 12-month period	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
08	20%	§19.503	Weekly Observation
02, 03, 10, & 14	10%	§18.501 and A.C.A.	Weekly Observation
20	5%	§18.501 and A.C.A.	Inspector Observation
21	20%	§19.503	Annual Observation

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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Diesel Tank 1 (6,500 gal)	A-3	-	-	0.0044	-	-	0.0044	0.0044
Diesel Tank 2 (400 gal)	A-3	-	-	0.0003	-	-	0.0003	0.0003
Diesel Tank 3 (300 gal)	A-3			0.0003			0.0003	0.0003
A-3 Totals		-	-	0.0050	-	-	0.0050	0.0050
Bark, Chips, Shavings Storage and Loadout	A-13	1.26	-	-	-	-	-	-

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 #
1862-AOP-R2



## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Camden Timbers, LLC  
 Permit Number: 1862-AOP-R3  
 AFIN: 52-00247

\$/ton factor	27.27	Annual Chargeable Emissions (tpy)	290.41
Permit Type	Modification	Permit Fee \$	1000

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	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	0.9
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 condensable 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		125.3	125.4	0.1	0.1	125.4
PM <sub>10</sub>		91.2	91.3	0.1		
PM <sub>2.5</sub>		0	0	0		
SO <sub>2</sub>		1	1.2	0.2	0.2	1.2
VOC		152	152.2	0.2	0.2	152.2
CO		29.2	29.6	0.4		
NO <sub>x</sub>		11.2	11.6	0.4	0.4	11.6
Lead	<input type="checkbox"/>	0.01	0.01	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Acrolein	<input type="checkbox"/>	0.16	0.17	0.01		
Formaldehyde	<input type="checkbox"/>	2.8	2.81	0.01		
Manganese	<input type="checkbox"/>	0.02	0.02	0		
Total Other HAPs	<input type="checkbox"/>	10.54	10.55	0.01		
Acetone	<input checked="" type="checkbox"/>	0.01	0.01	0	0	0.01