STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2348-AOP-R6 AFIN: 70-00032

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Anthony Forest Products Company, LLC
5482 Junction City Highway
El Dorado, Arkansas 71730

3. PERMIT WRITER:

Sterling Powers

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
12/04/2025	Renewal	• Reduce Emissions from the Kilns to actual design capacity • Debarker and sawmill limits revised to a single limit • Revise emission factors and calculations for SN-04, SN-09, SN-11, SN-12, SN-13 • Adds a Parts Washer A-13 to IA List • Change Tanks in IA List as A-2
1/27/2026	Significant Modification	• Add a third Kiln (SN-03a) • Revise the Sawmill (SN-05) for Emission Factors

6. REVIEWER'S NOTES:

Anthony Forest Products Company, LLC (AFP) owns and operates (as Canfor) a sawmill located at 5428 Junction City Hwy, in Union County, Arkansas. This application will renew the permit, and proposes to:

- Revise the hourly permitted production capacity for the Direct-Fired Lumber Drying Kiln Nos. 1 (SN-01) and Nos. 2 (SN-02) to reflect actual design capacity. Each Kiln was permitted based on the assumed push rate of 18.5 MBf/hr but the actual design capacity 10.4 MBf/hr. AFP wishes to permit at 12.5 MBf/hr to include a safety factor to account for higher production rates under ideal ambient conditions. The facility is voluntarily lowering its potential-to-emit considering that a previously permitted unit was never constructed.
- Construct a new Direct-Fired Lumber Drying Kiln No. 3 (proposed SN-03a). These improvements are intended to increase site-wide lumber production capacity. This new kiln is a new physical change and is being evaluated under PSD rules based on the increase over actual emissions.
- Revise the debarker and sawmill limits in Specific Condition #14 to a single limit of 1,435,500 tons of rough logs processed annually in the sawmill. This limit is the total annual capacity of 319,000 MBf/year for SN-01, SN-02, and SN-03a. Assuming continuous operation for all equipment, the kilns represent the bottleneck for mill throughput, making this limit consistent with actual production constraints. In addition, the previous permit had sawmill capacity higher than debarker capacity, which is believed to be an error because debarking causes a 10% loss of weight before entering the sawmill.
- Reorganize the process description to improve the presentation and grouping.
- Revise emission factors and calculations for various units, including Lumber Mill Debarker (SN-04), Sawmill Operations (SN-05), Paved and Unpaved Haul Roads (SN-09), Material Processing (SN-11) calculations, Storage Piles (SN-12), Planer Mill Storage Bin (SN-13).

Permitted emissions will increase by 3.9 tpy PM_{10}, 0.1 tpy SO_2, 1.49 tpy Phenol, 5.98 tpy Acetaldehyde, 0.54 tpy Formaldehyde, and decrease by 18.4 tpy PM, 29.9 tpy VOC, 5.4 tpy CO, 3.1 tpy NO_X, 1.44 tpy Methanol, 0.54 tpy Formaldehyde, and 0.64 tpy Total HAPs.

Reviewer Notes: The continuous lumber kilns primary purpose is not recovering thermal energy in the form of steam or hot water and are direct-fired, as the combustion gases from the fuel directly contacts the lumber during the drying process. Therefore, direct fired lumber kilns are not considered process heaters or boilers, and Boiler MACT is not applicable (Subpart DDDDD).

7. COMPLIANCE STATUS:

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

Last inspection was August 20, 2024. No violations were reported or found during the inspection.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? Y
If yes, were GHG emission increases significant? N

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 underwent PSD review.

Actual-To-Projected-Actual Test (ATPAT)

Source	Description	Filterable PM	PM10	PM2.5	SO2	VOC	CO	NOx	CO2e
SN-01	Direct-Fired Lumber Drying Kiln No. 1	0.61	1.22	1.22	0.06	70.8	8.9	5.3	12,735
SN-02	Direct-Fired Lumber Drying Kiln No. 2	0.86	1.59	1.59	0.08	106.2	10.8	6.4	15,408
SN-04	Lumber Mill Debarker	0.45	0.39	0.09	-	-	-	-	-
SN-05	Sawmill Operations	4.74	3.85	1.04	-	-	-	-	-
SN-06	Planer Mill HE Cyclone	1.00	0.98	0.98	-	-	-	-	-
SN-09	Paved and Unpaved Haul Roads	13.16	3.74	0.38	-	-	-	-	-
SN-11	Material Processing (Chipping, Bark Hog, and Planer Hog)	0.18	0.15	0.03	-	-	-	-	-
SN-12	Storage Piles	0.06	0.03	0.00	-	0.00	-	-	-
SN-13	Planer Mill Storage Bin (Storage and Loadout)	0.09	0.01	0.01	-	-	-	-	-
Total Actual-To-Projected-Actual Test		**21.15**	**11.96**	**5.34**	**0.14**	**177.05**	**19.68**	**11.71**	**28,143**

Actual-to-Potential Test (ATPT)

Baseline Actual Emissions

Source	Description	Filterable PM	PM10	PM2.5	SO2	VOC	CO	NOx	CO2e
SN-03a	Direct-Fired Lumber Drying Kiln No. 3	0	0	0	0	0	0	0	0

Potential to Emit (PTE)

Source	Description	Filterable PM	PM10	PM2.5	SO2	VOC	CO	NOx	CO2e
SN-03a	Direct-Fired Lumber Drying Kiln No. 3	1.12	1.85	1.85	0.08	152.0	10.76	6.40	15,386

Actual-to-Potential Test (ATPT)

Source	Description	Filterable PM	PM10	PM2.5	SO2	VOC	CO	NOx	CO2e

SN-03a	Direct-Fired Lumber Drying Kiln No. 3	1.12	1.85	1.85	0.08	152.0	10.76	6.40	15,386

Hybrid Test

Hybrid Test

Step 1 Analysis	Filterable PM	PM10	PM2.5	SO2	VOC	CO	NOx	CO2e
Total ATPAT Test	21.1	12.0	5.3	0.1	177.0	19.7	11.7	28,143
Total ATPT Test	1.1	1.9	1.9	0.1	152.0	10.8	6.4	15,386
Hybrid Test Total Emission Increase	22.3	13.8	7.2	0.2	329.0	30.4	18.1	43,529
PSD Significant Emission Rate (SER)	25	15	10	40	40	40	40	75,000
% of PSD SER Threshold	89%	92%	72%	1%	823%	76%	45%	58%

All criteria pollutants are under % of PSD SER Threshold, excepting the previously permitted VOC value.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

01, 02, 03a	Initial Notification is the only requirement.	NESHAP Subpart DDDD
18	HAPs	NESHAP Subpart ZZZZ NESHAP Subpart IIII

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. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? Y
(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any 8 CAR pt. 40 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? Y
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
Facility	ADEQ 8 CAR pt. 40	Arkansas Air Pollution Control Code
Facility	ADEQ 8 CAR pt. 41	Arkansas Plan of Implementation for Air Pollution Control (SIP)
Facility	ADEQ 8 CAR pt. 42	Regulations of the Arkansas Operating Air Permit Program
Facility	40 C.F.R. Part 52.21	Prevention of Significant Deterioration of Air Quality (PSD)
SN-01, SN-02	40 C.F.R. Part 63 Subpart DDDD	NESHAP for Plywood and Composite Wood Products
SN-18	40 C.F.R. Part 60, Subpart IIII	NSPS for Stationary Compression Ignition Internal Combustion Engines
SN-18	40 C.F.R. Part 63, Subpart ZZZZ	NESHAP for Stationary Reciprocating Internal Combustion Engines

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:

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 × TLV	Proposed lb/hr	Pass?
Acrolein	0.2292	0.0252	0.137	Fail
Formaldehyde	1.5	0.165	2.23	Fail
Methanol	262.08	28.829	6.19	Pass
POM	0.200	0.022	2.42E-04	Pass
Selenium	0.200	0.022	2.81E-06	Pass
Benzene	0.063	0.0069	1.53E-03	Pass
Arsenic	0.01	0.0011	2.34E-05	Pass
Beryllium	0.00005	5.50E-06	1.40E-06	Pass
Cadmium	0.002	0.00022	1.29E-04	Pass
Chromium	0.5	0.055	1.64E-04	Pass
Cobalt	0.02	0.0022	9.82E-06	Pass
Manganese	0.02	0.0022	4.44E-05	Pass
Mercury	0.025	0.00275	3.04E-05	Pass

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 ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Acrolein	2.292	0.307	Yes
Formaldehyde	15.00	4.978	Yes

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
01, 02	ADEQ Memo: *VOC emissions from Lumber Drying Kilns* from T Rheaume dated 10/31/2014 AP-42 Tables 1.4-1, -2, -3 Natural Gas	BACT Limit: 3.8 lb VOC/MBF[1] EF lb/10^6 scf BACT PM: 7.6 SO_2: 0.6 CO: 84 NO_X: 50 Formaldehyde: 7.50E-02 Selenium: 2.40E-05 POM: 8.82E-05	None	N/A	2 kilns limited by throughput: 319 MMBF/yr Each Kiln 12.5 MBF/hr x 3.8 lb VOC/MBF = 47.5 lb VOC/hr 45 MMBtu/hr Low NO_X Burners To convert from lb/10^6 scf to lb/MMBtu divide by 1020. [1] Includes natural gas VOC
01, 02,	Assume PM_{10} = PM NCDENR Wood Kiln Emission Calculation Factor Sheet for Softwood	Lb/MBF BACT Limit: PM/ PM_{10}: 0.022 Acrolein: 0.0075 Methanol: 0.199 Formaldehyde: 0.0183	None	N/A	Lumber Drying Kilns Max Annual Thruput = 315 MMBF/yr Max Hourly Thruput = 12.5 MBF/hr @ SN-01, 02, and 03
03a	ADEQ Memo: *VOC emissions from Lumber Drying Kilns* from T Rheaume dated 10/31/2014 AP-42 Tables 1.4-1, -2, -3 Natural Gas	Lb/MBF: VOC: 3.8 Methanol: 0.18 Phenol: 0.01 Formaldehyde: 0.065 Acetaldehyde: 0.04 Acrolein: 0.004 Lb/MMscf PM Total: 0.022 PM10: 0.022 PM2.5: 0.022 SO2: 0.6 CO: 84 NOx: 50 Formaldehyde: 7.5	None	N/A	Hourly Natural Gas Usage: 30 MMBtu/hr Hourly Production: 9.13 MBF/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
		POM: 8.82E-05 Selenium: 2.4E-05 Benzene: 2.10E-03 Hexane: 1.8 Manganese: 3.8E-04 Chromium: 1.4E-03			
04	ADEQ Memo from CHurt to TRheaume dated 08/22/2003 and NC-DENR [1] TCEQ Wood Ind. EF, App A3	lb/ton log Thruput BACT Limit PM: 0.02 PM_{10}: 0.011 ($PM_{2.5}$ = 0.0338)	95%	Enclosed Hood	1,435,500 tpy 990 tph max Log Thruput @ 17.95 tons/MBF
05	AP-42 Sec 10.3-1 [1] TCEQ Wood Ind. EF, App A3	lb/ton log Throughput BACT Limit PM: 0.35 Bucking lb/ton PM: 0.035 PM_{10}: 0.0175 Sawing lb/ton PM: 0.35 PM10: 0.20	85% 90%	Partial Enclosure Control Enclosed Sawmill Building	1,435,500 tpy 990 tph max log Thruput @17.95 tons/MBF
06	Cyclone Manufacturer Guarantee	Planer Mill - BACT PM: 0.004 gr/dscf PM_{10}: 0.27 lb/hr, PM: 0.28 lb/hr,	Cyclone	99.99%	4,636,800 dscf/hr 1.2x safety factor built in
09	AP-42 13.2.2.2. Eq. 1a [1] (11/06) and AP-42 13.2.2.1 Eq. 1[2] (1/11)	'Haul Roads' Unpaved[1] s: 8.4 W: varies k: 0.011 (PM) k: 0.0022 (PM_{10}) k: 0.00054 ($PM_{2.5}$) a: 0.70 (PM) a: 0.90 ($PM_{10\ \&\ 2.5}$) b: 0.45 and Paved Roads[2]	Road Watering Plan	90%	$E = k\ (s/12)^a \times (W/3)^b$ Eq 1a UNPAVED where E = size-specific EF (lb/VMT) s = surface material silt content (%) W = mean vehicle wt. (tons) M = surface mat 'l moisture content (%) S = mean vehicle speed (mph) *C* = EF for 1980's vehicle fleet exhaust, brake and tire wear.

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
		k: 0.011 (PM) k: 0.0022 (PM_{10}) k: 0.00054 ($PM_{2.5}$) sL: 0.6 W: varies			E = k (sL)0.91 x (W)1.02 Equation (1)PAVED where: E = PM emission factor (lb/VMT), k = particle size multiplier sL = road surface silt loading (g/m^2), and W = ave wt. (tons) of vehicles traveling road.
11	AP-42 10.3-1	Lb/ton BACT PM: 0.02 PM_{10}: 0.011	Total Enclosure	N/A	'Material Processing' Fugitive emissions from Debarking and Chipping
12	Pile handling – AP-42 13.2.4 Wind erosion - AP-42 13.2.5	BACT PM limit: 4.4 lb/hr Chips lb/ton: Filter PM: 4.15E-05 PM10: 1.95E-05 PM2.5: 2.95E-06 Chips with Enclosure: (lb/ton) Filter PM: 4.12E-05 PM10: 1.95E-05 PM2.5: 2.95E-06 Bark lb/ton Filter PM: 4.12E-05 PM10: 1.95E-05 PM2.5: 2.95E-06 Bark with Enclosure lb/ton Filter PM: 4.12E-05 PM10: 1.95E-05 PM2.5: 2.95E-06	None Or Enclosure	0% or 100%	Chips Throughput: 545,490 Safety factor 200% Bark throughput: 129,195
13	ADEQ Emission Factors outlined in	Dried Shavings Lb/ton Storage	None	N/A	'Storage Bin' Based on permitted annual

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
	8/22/2003 memo from CHurt to TRheaume	BACT PM: 0.0011 PM_{10}: 0.00009 Loadout BACT PM: 0.0022 PM_{10}: 0.00018			throughput Conservative estimate 86,130 tpy woodwaste generated Throughput: 57 ton/hr
14	TANKS 4.0.9d	Oil	None	None	11 light color Tanks
15	TANKS 4.0.9d	Diesel fuel	None	None	2 light color Tanks
16	TANKS 4.0.9d HAP speciation factors from EPA document "*Gasoline Distribution Industry..*"	Gasoline HAPs to VOC ratio by wt. Total HAPs: 23%	None	None	1 light color Tank
18	AP-42, Table 3.3-1	PM: 0.2 g/kw-hr PM_{10}: 0.2 g/kw-hr VOC: 4.0 g/kw-hr NOx: 4.0 g/kw-hr CO: 3.5 g/kw-hr lb/MMBtu Acrolein: 9.25E-05 Benzene: 9.33E-04 Formaldehyde: 1.18E-03 POM: 1.68E-04	None	N/A	197 bhp 500 hours/yr 147 bkW max output

16. 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				

17. 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)
Facility	Annual Lumber Throughput	Maximum 319 MMBF / rolling 12 months	Monthly	Yes
01, 02, 03a	Combust only pipeline quality natural gas in burners	Maintain valid gas tariff, purchase contract, fuel analysis or other appropriate documentation, or perform periodic testing	On-going	No
01, 02. 03a	Develop, maintain, and follow a routine and repair maintenance and housekeeping Plan BACT: Proper Maintenance and Operation	Record 1. Facility name and location. 2. Record the activity SN or description. 3. Date and time of maintenance or observation. 4. Maintenance activity performed, including replacement parts. 5. Name of person conducting the maintenance.	As performed	No
01, 02, 03a	NESHAP Subpart DDDD	Initial Notification §63.9(b)	One-time	Yes
05	Annual Log Throughput BACT: Building	Maximum 1,435,500 tons / rolling 12 months	Monthly	Yes
06	Manufacturers' Operating Manuals and Maintenance Logs	Must be operated and maintained in accordance with manufacturers' specs and good air	Keep Manual for Life of Unit(s) On-going	No

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	BACT: Proper Maintenance and Operation	pollution control and op practices for minimizing emissions. Must up-date maintenance logs on an as performed basis. Must operate at all times contiguous equipment is in operation.		
09	Road Watering Plan	Maintain Road Watering Plan Records	On-going	No
09	Road Dust (PM/PM_{10})	Keep dust from extending beyond property boundary	On-going	No
09	If Dust Suppression Agent used, Maintain MSDS	Shall contain no VOC, no HAP, no air contaminants	Current, legible MSDS	No
18	Total Operating Hours (emergency and non-emergency combined)	500 Total Hours per calendar year	Monthly	No
18	During Extended Emergency Use *in excess* of 500 hours	No limit during Emergency	If occurs	Yes
18	NESHAP Subpart ZZZZ	Must be in compliance upon startup	Monthly	No
18	Diesel Fuel	Only ULSD fuel with the sulfur content no greater than 0.0015% sulfur by weight.	Keep legible MSDS	No

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
18	Good Combustion Practices	Follow OEM manual	As occurs	No
Facility	Permit Renewal Submit at least 6 months before expiration	Permit is valid for 5 years, beginning on date permit issued and ends five (5) years later, GP #3, unless renewal submitted 6 months prior to expiration date	Every 5 years	Yes
11	BACT: Wind barrier	Keep barrier to prevent wind erosion	On going	No
12	Storage Piles	Keep dust down by wet suppression	Daily, as needed	No
13	Storage Bin	Enclosed Bin for Transport	On going	No
14	Oil Tanks	Nte 14,788 gallons in 24-hours and nte 175,056 gallons of oil per rolling 12 months	On going	No
15	Diesel Tanks	Nte 1,000 gallons in 24-hours and nte 52,000 gallons of diesel per rolling 12 months	On going	No
16	Diesel Tank	Nte 9,000 gallons in 24-hours and nte 468,000 gallons of diesel per rolling 12 months	On going	No

18. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 03a	5%	8 CAR § 40-401	Use natural gas fuel only
04, 05, 06, 11, 12, 13	5%	8 CAR § 40-401	Weekly Observation
09 offsite	0%	8 CAR § 40-401	Annual ADEQ Observation

SN	Opacity	Justification for limit	Compliance Mechanism
18	20%	8 CAR § 41-403 and 40 C.F.R. § 52 Subpart E	Observation *if* fire pump runs 3 consecutive hours, otherwise none required

19. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

20. 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
S-2 Gasoline Tank (500 Gal)	A-13			0.19				
Parts Washer	A-13			0.07				
S-20 Hydraulic Oil Storage Tank (130 Gal)	A-2			0.0001				
S-10 Hydraulic Oil Storage Tank (60 Gal)	A-2			0.0001				
S-13 Hydraulic Oil Storage Tank (100 Gal)	A-2			0.0001				
S-19 Hydraulic Oil Storage Tank (160 Gal)	A-2			0.0001				
S-23 Hydraulic Oil Storage Tank (130 Gal)	A-2			0.0001				
S-24 Hydraulic Oil Storage Tank (50 Gal)	A-2			0.0001				
S-5 Fire Pump Engine Diesel Tank (260 Gal)	A-3			0.0004				
S-22 Fuel Oil Storage Tank (350 Gal)	A-3			0.0001				
S-14 Hydraulic Oil (275 Gal)	A-3			0.0001				
Hydraulic Oil Tank (340 Gal)	A-3			0.0001				

Hydraulic Oil Tank (370 Gal)	A-3			0.0001				
Hydraulic Oil (50 Gal)	A-3			0.0001				
Total				0.262				

21. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2348-AOP-R5

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Anthony Forest Products Company
Permit Number: 1145-AR-6
AFIN: 60-00049

$/ton factor	28.14	Annual Chargeable Emissions (tpy)	634.50092
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	☐
If Hold Active Permit, Amt of Last Annual Air Permit Invoice $	0
Total Permit Fee Chargeable Emissions (tpy)	-51.2090757
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		56.6	38.4	-18.2	-18.2	38.4
PM_{10}		12.9	19.4	6.5		
$PM_{2.5}$		0		0		
SO_2		0.5	0.6	0.1	0.1	0.6
VOC		599.2	569.3	-29.9	-29.9	569.3
CO		48.9	43.5	-5.4		
NO_X		29.4	26.2	-3.2	-3.2	26.2
Methanol	☐	31.35	26.91	-4.44		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Phenol	☐	0		0		
Acetaldehyde	☐	0		0		
Acrolein	☐	1.2	0.6	-0.6		
Benzene	☐	0	0.0014	0.0014		
1,3-Butadiene	☐	0		0		
Formaldehyde	☐	2.94	9.76	6.82		
Dichlorobenzene	☐	0		0		
Hexane	☐	0		0		
Naphthalene	☐	0		0		
Toluene	☐	0		0		
Xylenes	☐	0		0		
Arsenic	☑	0		0	0	0
Beryllium	☑	0		0	0	0
Cadmium	☑	0		0	0	0
Chromium	☑	0	0.000717	0.000717	0.000717	0.000717
Cobalt	☑	0		0	0	0
Manganese	☑	0	0.000195	0.000195	0.000195	0.000195
Mercury	☑	0		0	0	0
Nickel	☑	0		0	0	0
Selenium	☑	0.01	0.0000123	-0.0099877	-0.009988	0.0000123
POM	☐	0.01	0.000103	-0.009897		
Total HAPs	☐	46.31	45.67	-0.64		