

## STATEMENT OF BASIS

For the issuance of Air Permit #2370-AGP-000 AFIN: Statewide

1. PERMITTING AUTHORITY:  
Division of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317
2. APPLICANT:  
  
Qualifying Air Curtain Incinerators
3. PERMIT WRITER:  
  
Elliott Marshall
4. NAICS DESCRIPTION AND CODE:  
  
NAICS Description: Solid Waste Combustors and Incinerators  
NAICS Code: 562213
5. SUBMITTALS:

Date of Submittal	Type of Permitting Action (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
Not Applicable	Renewal	Updated HAP emissions and included acetone emissions

6. REVIEWER'S NOTES:

This permit is a renewal of Air Permit #2370-AGP-000 for certain Title V Air Curtain Incinerators in Arkansas (referred to as either the "General Permit" or "GP"). Changes to the General Permit include:

1. Update citations and verbiage throughout the permit to be consistent with Division of Environmental Quality standards.
2. Increase HAP emissions to include HAPS that were erroneously excluded in the past.
3. Add acetone emissions.
4. Removed Title VI provisions from the permit; these are now included in the NOI.
5. On April 11, 2024, the U.S. Environmental Protection Agency removed Title V permit requirements for certain air curtain incinerators (ACIs) that burn only wood waste, clean lumber, yard waste, or a mixture of these three types of waste. ACI

subject to 40 CFR Part 60 Subpart CCCC, Commercial and Industrial Solid Waste Incineration Unit (CISWI), are still required to obtain a Title V permit. ACI subject to 40 CFR Part 60 Subpart(s) EEEE & AAAA, are not required to obtain a TV permit because they meet EPA requirements to exempt them. The Division of Environmental Quality only offers a Title V general permit for ACI's, as it satisfies the most conservative regulatory requirements for ACI's that would qualify for a general permit. A facility may apply for an individual minor source permit if a minor source permit is an option.

Permitted emission rates are increasing by 0.49 tpy Total HAPs and 0.01 tpy Acetone.

7. COMPLIANCE STATUS:

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

Not Applicable – This is a General Permit.

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)
Air Curtain Incinerators	PM, Opacity	NSPS AAAA
		NSPS CCCC
		NSPS EEEE

10. 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		

11. EMISSION CHANGES AND FEE CALCULATION:

Plantwide Permitted Emissions (tons/yr)			
Pollutant	Previous Permit	This Permit	Change
PM	99.5	99.5	-
PM <sub>10</sub>	99.5	99.5	-
PM <sub>2.5</sub>	8.5	8.5	-
SO <sub>2</sub>	0.8	0.8	-
VOC	8.5	8.5	-
CO	19.9	19.9	-
NO <sub>x</sub>	30.6	30.6	-
Single HAP	1.52	1.52	-
Total HAPs	2.94	3.43	0.49
Acetone	-	0.01	0.01

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 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.

Due to the variability in location, air curtain size, and intermittent use, a modeling exercise is not meaningful.

c) H<sub>2</sub>S 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 H<sub>2</sub>S Standards

Y

If exempt, explain: No H<sub>2</sub>S emissions.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Air Curtain Incinerators	AP-42 Table 2.1-12	13 lb/ton PM/PM <sub>10</sub> 4 lb/ton NO <sub>x</sub> 0.1 lb/ton SO <sub>2</sub>	None	Included in Factors	No central source for all emission factors. Took worst case situations. Based calculations on 15,300 tons waste per year
	Air Burners, Inc. Air Curtain Burners Testing and Data (Missoula – USDA Forest Service)	1.1 lb/ton PM <sub>2.5</sub> 1.1 lb/ton VOC 2.6 lb/ton CO			
	AP-42 Table 1.6-3	Varies by HAP. 0.019 lb/MMBtu Hydrogen Chloride (Single Greatest HAP) 0.0369 lb/MMBtu Total HAPs			

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
Air Curtain Incinerators	Opacity	EPA Reference Method 9	Initial and Annually	40 C.F.R. §§ 60.1450, 60.2255, or 60.2972

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)
Air Curtain Incinerators	ACI hours operated	15,300 tons yearly of waste incinerated	Monthly	N
	ACI throughput rate			
	All initial and annual opacity tests results	10%	As needed	Y

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
Air curtain incinerator	10%	40 C.F.R. § 60.1445(a)(1), 40 C.F.R. § 60.2250 (a), or 40 C.F.R. § 60.3066(a)(1)	EPA Reference Method 9
Air curtain incinerator during startup	35%	40 C.F.R. § 60.1445(a)(2), 40 C.F.R. § 60.2250 (b), or 40 C.F.R. § 60.3066(a)(2)	EPA Reference Method 9

18. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

Permit #: 2370-AGP-000

AFIN: Statewide

Page 6 of 6

19. GROUP A INSIGNIFICANT ACTIVITIES:

The insignificant activities will be detailed in the Notice of Intent.

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 #
All Previously Issued Permits