



**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT NO. 67889**

NewLife Forest Products, LLC

I. INTRODUCTION

This Class II permit is issued to NewLife Forest Products (NLFP), LLC, the Permittee, for Lumberjack Mill, a saw mill, located in Heber, Navajo County, Arizona.

NLFP is proposing to upgrade the equipment and capacity of the Lumberjack Mill to support its obligations under the Four Forest Restoration Initiative (4FRI). The 4FRI is a collaborative effort by stakeholders representing government, environmental, education and community interests to restore forest ecosystems on portions of four national forests - Coconino, Kaibab, Apache-Sitgreaves, and Tonto - along the Mogollon Rim in northern Arizona. The upgraded Lumberjack Mill will process Ponderosa Pine logs collected from the four national forests into lumber for sale and distribution to customers.

General processing activities at the Lumberjack Mill are: Woodworking Operations, Wood Drying Operations, Steam Production, Drying Heat Source, and Support Operations.

The uncontrolled emissions from this facility are greater than the significance levels identified in A.A.C. R18-2-101.131. Therefore, a class II permit is required for this facility in accordance with A.A.C. R18-2-302.B.2.a.

A. Company Information

1. Facility Name: Lumberjack Mill
2. Facility Location: 3830 Highway 277, Heber, Navajo County, AZ 85928
3. Mailing Address: 4220 E McDowell Rd, Ste 103, Mesa, AZ 85215

B. Attainment Classification

This facility is located in an area which is designated attainment/unclassified for all criteria pollutants.

C. Control Devices

Emissions from planer operations and chipper are controlled by a cyclone. There are no other emission control equipment on site.

II. EMISSIONS

Emission calculations were estimated using emissions factors from various sources including but not limited to AP-42 and the National Council for Air and Stream Improvement (NCASI). Details can be found in the submitted permit application and emissions calculations spreadsheet provided by the source. ADEQ verified the emission factors used for the calculations.

**Table 1: Potential Emissions**

| Pollutant | Emissions (tons per year) | Minor NSR Thresholds | Minor NSR Triggered? |
|----------------------------|--------------------------------------|---------------------------------|---------------------------------|
| PM | 13.79 | - | - |
| PM₁₀ | 13.71 | 7.5 | Yes |
| PM_{2.5} | 8.11 | 5.0 | Yes |
| NO_x | 21.27 | 20 | Yes |
| CO | 21.47 | 50 | No |
| SO₂ | 2.17 | 20 | No |
| VOC | 89.98 | 20 | Yes |
| HAPs | 8.90 | - | - |
| GHG CO₂e | 18,421.37 | | |

III. MINOR NEW SOURCE REVIEW

This source is subject to the ADEQ's minor NSR program pursuant to the requirements of A.A.C R18-2-334.C. The source, NewLife Forest Products (NLFP), has proposed to satisfy the minor NSR obligations in A.A.C. R18-2-334 by implementing Reasonably Available Control Technology (RACT) for each applicable emission source.

A case-by-case RACT analysis was done for the affected emissions unit and pollutants. Based on this analysis NLFP proposes that proper design and operation be considered RACT for all emission units triggering minor NSR.

IV. APPLICABLE REGULATIONS

Table 2 displays the applicable requirements for each permitted piece of equipment along with an explanation of why the requirement is applicable.

**Table 2: Verification of Applicable Regulations**

| Unit | Control Device | Rule | Discussion |
|--|---|--|---|
| Steam Boiler | Natural gas Low NOx burner | 40 CFR 60 Subpart Dc, | NSPS 40 CFR 60 Subpart Dc is applicable to boilers between 10 and 100 MMBtu/hour. As the boiler is natural gas-fired, only recordkeeping and reporting requirements under subpart Dc are applicable. NESHAP 40 CFR 63 Subpart JJJJJ requirements are not applicable to gas-fired boilers |
| Saw mill, Planer and Drying Kilns Operations | NA | A.A.C. R18-2-702 A.A.C. R18-2-730 | General provisions, Standards for Performance for Unclassified Sources |
| Fugitive dust sources | Water Trucks Dust Suppressants | A.A.C. R18-2 Article 6 A.A.C. R18-2-702 | These standards are applicable to all fugitive dust sources at the facility. |
| Abrasive Blasting | Wet blasting; Dust collecting equipment; Other approved methods | A.A.C. R-18-2-702 A.A.C. R-18-2-726 | These standards are applicable to any abrasive blasting operation. |
| Spray Painting | Enclosures | A.A.C. R18-2-702 A.A.C. R-18-2-727 | This standard is applicable to any spray painting operation. |
| Demolition/renovation operations | N/A | A.A.C. R18-2-1101.A.8 | This standard is applicable to any asbestos related demolition or renovation operations. |
| Mobile sources | None | A.A.C. R18-2-801 | These are applicable to off-road mobile sources, which either move while emitting air pollutants or are frequently moved during the course of their utilization. |

V. MONITORING REQUIREMENTS

A. Facility Wide Opacity

- At the frequency specified in any sections of the permit, the Permittee shall conduct an instantaneous survey of visible emissions from both process stack



sources, when in operation, and fugitive dust sources.

2. If the plume on an instantaneous basis appears less than or equal to the applicable opacity standard, then the Permittee shall keep a record of the name of the observer, the date on which the instantaneous survey was made, and the results of the instantaneous survey.
3. If the plume on an instantaneous basis appears greater than the applicable opacity standard, then the Permittee shall immediately conduct a six-minute observation of the plume.

B. Steam Boiler

The Permittee shall maintain a record of monthly propane/natural gas consumption for the boiler. This may be done by maintaining a copy of the monthly propane/natural gas bill for the steam boiler.

C. Woodworking and Kiln Operations

1. To demonstrate compliance with throughput limitations, the Permittee shall maintain records of the combined throughput of lumber for all kilns on a 12-month rolling total basis.
2. Each month, the Permittee shall monitor visible emissions emanating from all operations under this section in accordance with Condition I.A.
3. The Permittee shall monitor and keep a record of the operating parameters as specified in the Operation and Maintenance Plan for Kiln-1, Kiln-2 and Kiln-3 at least once per operation kiln cycle.
4. The Permittee shall keep records of the maintenance conducted on Kiln-1, Kiln-2 and Kiln-3 in accordance with the Operation and Maintenance Plan.

D. Fugitive Dust

1. The Permittee is required to keep record of the dates and types of dust control measures employed.
2. The Permittee is required to show compliance with the opacity standards by having a Method 9 certified observer perform monthly survey of visible emission from fugitive dust sources. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed the applicable standard.
3. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
4. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.

E. Periodic Activities

1. The Permittee is required to record the date, duration and pollution control measures of any abrasive blasting project.



- 2. The Permittee is required to record the date, duration, quantity of paint used, any applicable MSDS, and pollution control measures of any spray painting project.
- 3. The Permittee is required to maintain records of all asbestos related demolition or renovation projects. The required records include the “NESHAP Notification for Renovation and Demolition Activities” form and all supporting documents.

F. Mobile Sources

The Permittee is required to keep records of all emission related maintenance performed on the mobile sources.

VI. LIST OF ABBREVIATIONS

| | |
|-----------------------|---|
| A.A.C. | Arizona Administrative Code |
| ADEQ | Arizona Department of Environmental Quality |
| MMBtu/hr | Million British Thermal Units per hour |
| CO | Carbon Monoxide |
| CO ₂ | Carbon Dioxide |
| GHG CO ₂ e | Green House Gas CO ₂ equivalent |
| HAP | Hazardous Air Pollutant |
| hr | Hour |
| m | Meter |
| MBF | 1000 board feet of lumber |
| NO _x | Nitrogen Oxide |
| PM | Particulate Matter |
| PM ₁₀ | Particulate Matter Nominally less than 10 Micrometers |
| PTE | Potential-to-Emit |
| SO ₂ | Sulfur Dioxide |
| TPY | Tons per Year |
| VOC | Volatile Organic Compound |
| yr | Year |