

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 2098-A

IS ISSUED TO:

Antoine Hardwoods, Inc.
7646 Highway 26
Antoine, AR 71922
Clark County
AFIN: 10-00014

THIS PERMIT IS Antoine Hardwoods, Inc.'s AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date

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Section I: FACILITY INFORMATION

PERMITTEE: Antoine Hardwoods, Inc.

AFIN: 10-00014

PERMIT NUMBER: 2098-A

FACILITY ADDRESS: 7646 Highway 26
Antoine, AR 71922

COUNTY: Clark County

CONTACT PERSON: John Ledbetter

CONTACT POSITION General Manager

TELEPHONE NUMBER: 870-379-3133

REVIEWING ENGINEER: Karen Cerney

UTM Zone 15

UTM North-South (Y): 3766.764

UTM East-West (X): 461.433

Section II: INTRODUCTION

Summary

Antoine Hardwoods, Inc. owns a sawmill and two chip mills in Antoine, Arkansas. After an air inspection, it was determined that an air permit was required at the facility. Emissions from the facility consist of PM and PM₁₀. This is the initial air permit for the facility.

Process Description

Raw materials (hardwood and pine logs) are delivered by log trucks and are unloaded either at the sawmill log deck area, the new chip mill wet yard, or the old chip mill wet yard. Water is sprayed onto the logs in the wet yard to prevent stain and insect damage.

Sawmill

Logs are loaded onto the log deck by a front end loader. From the log deck, logs are routed through the cut up saw. The cut up saw cuts the logs into 9'6" logs. After the logs are cut, they are routed to the debarker. The debarked logs are loaded onto the carriage and cut up by the main saw, where the logs are cut on two sides. The two side cuts are routed to the gang saw for additional cutting. Ties and lumber exit the gang saw onto the green chain. Ties are sorted and stacked for delivery, while the lumber is routed through a two saw edger for additional trimming then discharged back to the green chain for sorting and stacking. The bark from the debarker is conveyed to a bark storage pile. The trim from the main saw, gang saw, and edgers are conveyed to the chipper. From the chipper, the chips are discharged to a vibrating screen and then blown into one of two covered vans. The bark stored in the bark storage piles and the chips stored in the vans are shipped off site to customers. Bark is loaded into trucks using front end loaders.

Old Chip Mill

The old chip mill is located directly next to the sawmill. At the old chip mill, logs are loaded into a drum debarker by front end loaders. The bark is conveyed to the bark storage pile (behind the sawmill). The debarked logs are chain conveyed to the chipper. The chips from the chipper are conveyor fed to an interim storage pile. A horizontal screw conveyor underneath the interim chip storage pile conveys the chips to an incline chain that feeds the chips into a trommel screen. The trommel screen separates the chips into three categories: fines, chips, and oversize material. The fines are conveyed to the fines storage pile. The chips are conveyed to the chips storage pile. The oversize material is conveyor fed to a rechipper. The chips from the rechipper are blown into the chip exit bin of the trommel screen and conveyed to the chip storage pile. Bark, fines, and chips are loaded into trucks by front end loaders and shipped off site to customers.

New Chip Mill

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The new chip mill is located across the pond from the sawmill and old chip mill. At the new chip mill, logs are loaded into a drum debarker by a crane. The bark is conveyed to the bark hog for additional processing and then conveyed to the bark storage pile. The debarked logs are chain conveyed to the chipper. The chips from the chipper are fed via an incline conveyor to one of two shaker screens. The shaker screen separates the chips into three categories: fines, chips, and oversize material. The fines are conveyed to the fines storage pile. The chips are conveyed to the chips storage pile. The oversize material is conveyor fed to a rechipper. The chips from the rechipper are routed via a cyclone to the chip conveyor and conveyed to the chip storage pile. Bark, fines, and chips are loaded into trucks by front end loaders and shipped off site to customers.

Clean-up Activities – Portable Equipment

Trim from the sawmill cut up saw is stock piled at the log deck area. On an as needed basis (once a year), portable equipment is rented to hog the trim material. The hogged material is added to one of the bark storage piles. The portable equipment is also used to hog other wood materials (such as log rejects that were not processed) that have been stockpiled.

Regulations

This facility is subject to regulation under the Arkansas Air Pollution Control Code (Regulation 18) and the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19).

The following table is a summary of the facility's total emissions.

Table 1 - Total Allowable Emissions

| Total Allowable Emissions | | |
|----------------------------------|------------------------|------------|
| Pollutant | Emissions Rates | |
| | lb/hr | tpy |
| PM | 177.0 | 84.4 |
| PM ₁₀ | 90.7 | 43.3 |

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Section III: PERMIT HISTORY

This is the first air permit issued to Antoine Hardwoods, Inc.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee will not exceed the emission rates set forth in the following table.
 [§19.501 *et seq.* of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective December 19, 2004, (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 2 - Criteria Pollutants

| SN | Description | Pollutant | lb/hr | tpy |
|-------|-------------------------------|------------------|-------|------|
| SN-01 | Sawmill | PM ₁₀ | 5.1 | 6.3 |
| SN-02 | Old Chip Mill | PM ₁₀ | 37.4 | 31.1 |
| SN-03 | New Chip Mill | PM ₁₀ | 37.4 | |
| SN-04 | New Chip Mill Cyclone | PM ₁₀ | 0.1 | 0.5 |
| SN-05 | Bark/Chip/Fines Storage Piles | PM ₁₀ | 0.1 | 0.1 |
| SN-06 | Haul Roads | PM ₁₀ | 10.6 | 5.3 |

- The permittee will not exceed the emission rates set forth in the following table.
 [§18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 3 - Non-Criteria Pollutants

| SN | Description | Pollutant | lb/hr | tpy |
|-------|-------------------------------|-----------|-------|------|
| SN-01 | Sawmill | PM | 8.9 | 10.8 |
| SN-02 | Old Chip Mill | PM | 65.6 | 54.5 |
| SN-03 | New Chip Mill | PM | 65.6 | |
| SN-04 | New Chip Mill Cyclone | PM | 0.1 | 0.5 |
| SN-05 | Bark/Chip/Fines Storage Piles | PM | 0.1 | 0.2 |
| SN-06 | Haul Roads | PM | 36.7 | 18.4 |

- Visible emissions will not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 4 - Visible Emissions

| SN | Limit | Regulatory Citation |
|-------|-------|---------------------|
| SN-01 | 20% | §19.503 |
| SN-02 | 20% | §19.503 |
| SN-03 | 20% | §19.503 |

| SN | Limit | Regulatory Citation |
|-------|-------|---------------------|
| SN-04 | 10% | §18.501 |
| SN-05 | 20% | §19.503 |
| SN-06 | 20% | §19.503 |

4. The permittee will not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [§18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]
5. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.901 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. The permittee will water all storage piles and haul roads as needed to ensure that the opacity limits in this permit are not exceeded and that no visible emissions extend beyond the property line of the facility. [§19.903 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-01 Conditions

7. The permittee will not process more than 9,700,000 board feet of lumber at the facility per consecutive 12-month period. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #7. The permittee will maintain a twelve month rolling total and each individual month's data on-site and made available to Department personnel upon request. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-02 and SN-03 Conditions

9. The permittee will not process more than 294,000 tons of logs at both chip mills combined (SN-02 and SN-03) per consecutive 12-month period. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #9. The permittee will maintain a twelve month rolling total and each individual month's data on-site and made available to Department personnel upon request. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated **6/17/2005**.

Table 5 - Insignificant Activities

| Description | Category |
|-----------------------------------|-----------------|
| 4,000 Gallon Diesel Fuel Tank | A-3 |
| 1,000 Gallon Hydraulic Fluid Tank | A-3 |
| Portable Hogging Equipment | A-13 |

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [§19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [§19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit; such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental
Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee will provide: [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms;
 - d. Utilities for sampling and testing equipment.
9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [§19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [§19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.

- b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.
- 11. The permittee will allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
- 12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [§19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30)

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days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [§19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]