

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 1628-AOP-R2

IS ISSUED TO:

Freeman Brothers, Inc. d.b.a
Bibler Brothers Lumber Company
Highway 7 South
Russellville, AR 72801
Pope County
CSN:58-0014

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

February 11, 1998

and

February 10, 2003

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE: Freeman Brothers, Inc. d.b.a.
Bibler Brothers Lumber Company

CSN: 58-0014
PERMIT NUMBER: 1628-AOP-R2

FACILITY MAILING ADDRESS: P.O. Box 490
Russellville, AR 72811

PHYSICAL LOCATION: Highway 7 South
Russellville, AR 72801

COUNTY: Pope

CONTACT POSITION: Terry Freeman
TELEPHONE NUMBER: 501-968-4986

REVIEWING ENGINEER: Loretta Reiber

UTM North-South (X): 3901.3
UTM East-West (Y): 488.0

SECTION II: INTRODUCTION

Freeman Brothers, Inc. d.b.a. Bibler Brothers Lumber Company currently operates a lumber mill located along US Highway 7 South in Pope County near Russellville, AR. The facility, which was established in 1963, operates under Standard Industrial Classification code number 2421 (i.e., softwood rough and dressed lumber, chips, sawdust, radius edge decking, shavings, and bark).

Pine logs are transported by truck from the forest to the facility. The trucks are unloaded at one of the following locations: the infeed system for immediate processing, dry storage for short term storage, or the wet storage area for long-term future demands.

The wet storage system is self-contained and consists of a storage area, a water storage pond, and a wet circulation system. Pumps are used to spray water from the pond onto logs in the storage area. The runoff from the spraying operations is gravity fed back into the water storage pond for reuse.

Infeed systems convey the logs one at a time through two debarkers. The bark is collected in a bark bin where it is loaded and shipped out by truck. Debarked logs are conveyed to the sawmill where a computer scans each log to determine the best places to cut the log and calculate the number of boards to be cut. Chips and sawdust generated from sawing operations fall underneath to a conveyor. The wood waste is sent to a shaker where the chips are separated from the sawdust. The chips and the sawdust are conveyed to separate bins before being loaded onto trucks. A diesel fired tub grinder grinds the bark and scrap before it is loaded onto a truck. The rough sawed lumber is arranged by a computerized sorter and manually stacked into bundles.

Four kilns (three natural gas fired and one steam heated) are used to remove the moisture and sap from the lumber. The gas fired kilns heat and circulate air in a closed system. These kilns are used for wood that does not require a slower drying cycle. The steam heated kiln is used primarily for wood that requires a longer drying time.

The dried lumber exits the kilns and is transferred to the planer mill. A pneumatic conveying system transfers wood shavings generated from the smoothing of lumber to a collection system consisting of a cyclone and two baghouses. The shavings are collected in a bin and loaded out by truck. The finished lumber is stacked, stored in a warehouse, and shipped out according to customer demand.

This facility also has a dual compartment storage tank. One compartment has a capacity of 2,000 gallons and stores gasoline. The other compartment has a capacity of 10,000 gallons and stores diesel fuel.

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Permit #1628-AOP-R2 is the third operating permit issued to Freeman Brothers, Inc. d.b.a. Bibler Brothers Lumber Company. Changes being made to the facility under this permit are described in the following Prevention of Significant Deterioration section. In addition to the changes described below, the permittee is using updated emission factors for some of the particulate matter emission sources. Some of the hourly emission rates are increasing due to increased capability made possible by the installation of the new drying kiln.

PREVENTION OF SIGNIFICANT DETERIORATION

General Information

Freeman Brothers, Inc. - d.b.a. Bibler Brothers Lumber Company is proposing to install a new lumber drying kiln and associated boilers. Along with the installation of the new kiln, the facility is also requesting an increase in permitted production of 23 million board feet for a total permitted production limit of 203 million board feet per year. The permittee is also converting Kiln #2 from a direct fired kiln to a steam heated kiln. Excess steam from the Kiln #4 and the Kiln #5 boilers will be used to heat Kiln #2 once the conversion has taken place.

The permitted increase in VOC emissions is in excess of the PSD Significant Increase Level of 40 tons per year. No netting of VOC emissions was allowed for this permit because the Department relied upon the VOC emission increases and decreases in issuing permit #1628-AOP-R1. Therefore, the net emission increase of VOCs is considered to be the total permitted increase of 123.7 tons per year. Permitted increases of other criteria pollutants are below the respective PSD Significant Increase Levels.

BACT Analysis

For a PSD permit, the applicant must perform a “top-down” BACT analysis for each new unit and for each affected emission unit that is undergoing a physical change or a change in the method of operation. The “top-down” PSD BACT analysis must satisfy two criteria under the Clean Air Act. First, the permit application must consider the most stringent technologies available. Second, if the applicant proposes less stringent controls, it must demonstrate, using objective data, that the most stringent controls are not achievable due to source specific energy, environmental, or economic impacts, and the permitting authority must exercise its informed judgment before accepting this determination. The PSD “top-down” BACT analysis consists of the following five steps:

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1. Identify all control technologies.
2. Eliminate technically infeasible options.
3. Rank remaining control technologies by control effectiveness.
4. Evaluate most effective controls and document results.
5. Select BACT.

The BACT analysis must address each pollutant subject to PSD review emitted by the unit. For this permitting action, only the increase in VOC emissions has been determined to be significant and is therefore subject to PSD review.

A BACT analysis was conducted for the drying kiln designated as source SN-10B and its associated boilers, source SN-10A. A BACT analysis is required for source SN-10A because it was installed at the same time as source SN-10B and is considered an affected source.

BACT Analysis for VOC from Kiln #5

The RACT/BACT/LAER Clearinghouse was searched for historical and transient control technologies associated with lumber drying kilns. Several similar kiln installations subject to PSD/BACT were found. The clearinghouse did not identify BACT as add-on and/or pollution prevention controls for lumber drying kilns. The NSR and CTC bulletin boards did not contain control information for lumber drying kilns. Thus, controls are not employed on other lumber drying kilns and since the kiln at Bibler is similar, are not feasible for this source. Bibler Brothers will operate the kiln in such a manner as to minimize emissions from this source.

BACT Analysis for VOC from Kiln #5 Boilers

Natural gas will be the only fuel used to fire the Kiln #5 Boilers. None of the natural gas fired units contained in the RACT/BACT/LAER Clearinghouse identified add-on controls for VOCs from combustion sources. The typical control listed for VOC from a natural gas combustion source was “good combustion practice.” Bibler Brothers will exercise good combustion practice in order to minimize the emissions from this source.

Ambient Air Impact Analysis

An air dispersion modeling analysis is a required part of a PSD permit application. The air dispersion modeling analysis is used to demonstrate that the emissions resulting from a proposed modification will not cause or contribute to a violation of any applicable National Ambient Air Quality Standard (NAAQS) or surpass a PSD Increment.

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The US EPA requires that PSD modeling be performed in two stages: the significance analysis and the full impact analysis. The significance analysis considers the net emissions change associated with PSD affected emission units to determine if the increased emissions will have a significant impact on the surrounding area. If the results of the significance analysis are below the corresponding Modeling Significance Levels the full impact analysis is not required.

There is no Modeling Significance Level for VOCs. Monitoring may be required with an increase in VOCs over 100 tons per year. In lieu of preconstruction ozone monitoring, existing monitoring data may be used. Bibler Brothers chose to use data from an ozone monitor located in Ozark National Forest. The highest concentration of 0.091 ppm was chosen to represent the background concentration for this facility. The increase in ozone concentration from the affected sources (0.0154 ppm) was determined using the Sheffe Method. The sum of the increase in ozone concentration and the background ozone concentration (0.1064 ppm) is below the NAAQS for ozone (0.12 ppm).

Class I Area Impact Analysis

The PSD regulations require that written notification be provided to the Federal Land Manager in the event that a major source or modification is located within 100 kilometers of a Class I area. Bibler Brothers, Inc. - West Facility is located about 95 kilometers from the Upper Buffalo Class I Area. The permittee notified the Federal Land Manager of the project proposed in the PSD permit application.

The proposed modification is not expected to have any adverse impacts to the Upper Buffalo Class I Area. As stated earlier, the expected increase in ozone concentration when added to the background concentration is well below the NAAQS. The background concentration used in the screening was taken from a monitor located less than 20 miles from the area. Also, as the only pollutant triggering PSD review is VOC, no visibility impacts are expected as a result of the proposed increase.

Additional Impacts Review

Three areas constitute the Additional Impacts Review: a growth analysis, a soils and vegetation analysis, and a visibility analysis.

The growth analysis includes a projection of the associated industrial, commercial, and residential growth that will occur in the area as a result of the source. The potential impact on the ambient air is also a part of the growth analysis. Bibler Brothers does not expect an increase in industrial, commercial, or residential growth as a result of the proposed modification.

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If all ambient concentrations are below the secondary NAAQS, then soils and vegetation should not suffer from any harmful effects as a result of the proposed modification. A secondary NAAQS for ozone does not exist. Since the increase in ozone concentration from the proposed sources when added to the background concentration is below the NAAQS, no harmful effects to soils and vegetation are expected from the proposed increases.

As the only pollutant triggering a PSD review is VOC, it is not expected that the proposed increases will cause any visibility impairment.

A summary of facility wide emissions may be found in the table below. Specific unit information may be located at the indicated cross reference page.

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	53.5	122.8	N/A
		PM ₁₀	3.7	13.7	
		SO ₂	1.1	1.8	
		VOC	193.4	487.3	
		CO	8.8	33.7	
		NO _x	14.2	43.4	
01	Debarker	PM	1.3	3.1	12
		PM ₁₀	0.1	0.3	
02	Bark Loadout	PM	2.6	6.2	12
		PM ₁₀	0.3	0.6	
03	Chip Bin	PM	1.5	3.6	14
		PM ₁₀	0.2	0.4	
04	Sawdust Bin	PM	17.2	40.6	14
		PM ₁₀	0.1	0.1	
05	Chip Bin Loadout	PM	3.0	7.1	14
		PM ₁₀	0.3	0.7	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
06	Kiln #2 (24 MMBTU/hr)	PM	0.4	1.5	18
		PM ₁₀	0.4	1.5	
		SO ₂	0.1	0.1	
		VOC	19.3	29.8	
		CO	0.9	3.9	
		NO _x	0.8	3.2	
07	Kiln #3 (30 MMBTU/hr)	PM	0.5	1.8	18
		PM ₁₀	0.5	1.8	
		SO ₂	0.1	0.1	
		VOC	24.5	104.1	
		CO	1.2	4.9	
		NO _x	0.9	4.0	
08	Planer Mill Vent System	PM	1.4	2.0	16
		PM ₁₀	0.1	0.2	
09	Shavings Loadout	PM	6.2	8.6	16
		PM ₁₀	0.1	0.1	
10A	Kiln #4 Boiler	PM	0.7	2.9	18
		PM ₁₀	0.7	2.9	
		SO ₂	0.1	0.1	
		VOC	0.3	1.2	
		CO	1.8	7.9	
		NO _x	1.5	6.4	
10B	Kiln #4	VOC	61.3	122.5	18
11	Tub Grinder	PM	0.8	1.9	22
		PM ₁₀	0.1	0.3	
		SO ₂	0.6	1.3	
		VOC	0.8	1.6	
		CO	1.9	4.2	
		NO _x	8.6	19.4	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
12	Sawdust Bin Loadout	PM PM ₁₀	17.2 0.1	40.6 0.1	14
13	Kiln #1	PM PM ₁₀ SO ₂ VOC CO NO _x	0.5 0.5 0.1 24.5 1.2 0.9	1.8 1.8 0.1 104.1 4.9 4.0	18
14	Gasoline Storage Tank (2,000 gallons)	VOC	1.0	0.2	24
15	Diesel Fuel Storage Tank (10,000 gallons)	VOC	0.1	0.1	24
16A	Kiln #5 Boiler	PM PM ₁₀ SO ₂ VOC CO NO _x	0.7 0.7 0.1 0.3 1.8 1.5	2.9 2.9 0.1 1.2 7.9 6.4	18
16B	Kiln #5	VOC	61.3	122.5	18

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SECTION III: PERMIT HISTORY

Bibler Brothers, Inc. began operation in the early 1960's. Modifications and/or additions were made in 1972, 1987, 1993, 1994, and 1995.

Permit #1628-A was issued to Bibler Brothers, Inc. on July 24, 1995. This was the first air permit issued to this facility. Emission limits were set for all of the criteria pollutant limits with the exception of lead.

Permit #1628-AR-1 was issued to Bibler Brothers, Inc. on July 31, 1997. This air permit allowed the facility to increase production and permitted two non-NSPS fuel storage tanks. This permit also defined this facility as a major source pursuant to 40 CFR 52.21 due to VOC emissions of approximately 298 tons per year.

Permit #1628-AOP-R0 was issued to Bibler Brothers, Inc. - West Facility on February 11, 1998. This was the first operating permit issued to this facility under Regulation 26. The steam heated kiln as well as the boiler used to produce the steam were replaced. A lower production limit was taken by the facility in order to stay below the PSD significant increase level.

Permit #1628-AOP-R1 was the second operating permit issued to Freeman Brothers, Inc. d.b.a. Bibler Brothers Lumber Company - West Facility. The only physical change that occurred with the issuance of this permit was the installation of a new dual compartment storage tank. Throughputs at the dual compartment fuel tank were increased which resulted in an increase in the permitted emissions from these sources. Production increases were requested which subjected the new kiln and its associated boilers to a retroactive Prevention of Significant Deterioration (PSD) review.

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SECTION IV: EMISSION UNIT INFORMATION

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SN-01 and SN-02
Debarking Operations

Source Description

Two conveyors transfer logs to two debarkers (SN-01) which remove all of the bark from the logs. The removed bark is collected in a bin designated as the bark loadout (SN-02) for storage before being loaded and shipped out in trucks.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The hourly rates are based upon the capacity of the equipment. Compliance with the annual rates will be demonstrated through the limit on the amount of board feet of lumber that may be processed at this facility.

SN-#	Pollutant	lb/hr	tpy
01	PM ₁₀	0.1	0.3
02	PM ₁₀	0.3	0.6

2. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The hourly rates are based upon the capacity of the equipment. Compliance with the annual rates will be demonstrated through the limit on the amount of board feet of lumber that may be processed at this facility.

SN-#	Pollutant	lb/hr	tpy
01	PM	1.3	3.1
02	PM	2.6	6.2

3. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from sources SN-01 and SN-02 as measured by EPA Reference Method 9.

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4. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, weekly observations of the opacities from sources SN-01 and SN-02 shall be conducted by a person trained, but not necessarily certified, in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the excess visible emissions. After corrective action has been taken, the permittee shall conduct another observation of the opacity from the source in question in order to verify that excess visible emissions are no longer present. The permittee shall maintain records of all visible emissions observations, the cause of any excess visible emissions, and any corrective action taken. These records shall be kept on site and made available to Department personnel upon request.

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SN-03, SN-04, SN-05, and SN-12
Chip and Sawdust Bins and Loadout

Source Description

Chips and sawdust generated during the cutting of the logs in the sawmill fall onto a conveyor. The conveyor carries the material to a shaker which separates the chips from the sawdust. The chips are conveyed to a chip bin (SN-03) while the sawdust is conveyed to a sawdust bin (SN-04). The chips and sawdust are stored in their respective bins prior to being loaded into a truck and shipped off-site. Emissions from chips being loaded out have been designated as SN-05. Emissions from the sawdust being loaded out have been designated as SN-12.

Compliance with the annual emission limits will be verified through compliance with Plantwide Conditions #1 and #2.

Specific Conditions

5. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The hourly rates are based upon the capacity of the equipment. Compliance with the annual rates will be demonstrated through the limit on the amount of board feet of lumber that may be processed at this facility.

SN-#	Pollutant	lb/hr	tpy
03	PM ₁₀	0.2	0.4
04	PM ₁₀	0.1	0.1
05	PM ₁₀	0.3	0.7
12	PM ₁₀	0.1	0.1

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6. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The hourly rates are based upon the capacity of the equipment. Compliance with the annual rates will be demonstrated through the limit on the amount of board feet of lumber that may be processed at this facility.

SN-#	Pollutant	lb/hr	tpy
03	PM	1.5	3.6
04	PM	17.2	40.6
05	PM	3.0	7.1
12	PM	17.2	40.6

7. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from sources SN-03, SN-04, SN-05, and SN-12 as measured by EPA Reference Method 9.
8. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, weekly observations of the opacities from sources SN-03, SN-04, SN-5, and SN-12 shall be conducted by a person trained, but not necessarily certified, in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the excess visible emissions. After corrective action has been taken, the permittee shall conduct another observation of the opacity from the source in question in order to verify that excess visible emissions are no longer present. The permittee shall maintain records of all visible emissions observations, the cause of any excess visible emissions, and any corrective action taken. These records shall be kept on site and made available to Department personnel upon request.

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SN-08 and SN-09
Planer Mill

Source Description

Dried lumber is sent from the kilns to the planer mill. The planer mill uses 20 knives to smooth the rough lumber. Wood shavings generated from the smoothing operations are collected by a cyclone and two baghouses in series (SN-08) through a pneumatic conveying system. A bin collects the shavings which are then loaded onto a truck. Emissions from the loadout of the bin have been designated as SN-09.

Compliance with the annual emission limits will be verified through compliance with Plantwide Conditions #1 and #2.

Specific Conditions

9. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The hourly rates are based upon the capacity of the equipment. Compliance with the annual rates will be demonstrated through the limit on the amount of board feet of lumber that may be processed at this facility.

SN-#	Pollutant	lb/hr	tpy
08	PM ₁₀	0.1	0.2
09	PM ₁₀	0.1	0.1

10. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The hourly rates are based upon the capacity of the equipment. Compliance with the annual rates will be demonstrated through the limit on the amount of board feet of lumber that may be processed at this facility.

SN-#	Pollutant	lb/hr	tpy
08	PM	1.4	2.0
09	PM	6.2	8.6

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11. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-09 as measured by EPA Reference Method 9.
12. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-08 as measured by EPA Reference Method 9.
13. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, weekly observations of the opacity from source SN-09 shall be conducted by a person trained, but not necessarily certified, in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the excess visible emissions. After corrective action has been taken, the permittee shall conduct another observation of the opacity from the source in question in order to verify that excess visible emissions are no longer present. The permittee shall maintain records of all visible emissions observations, the cause of any excess visible emissions, and any corrective action taken. These records shall be kept on site and made available to Department personnel upon request.
14. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct weekly observations of the opacity from source SN-08 and keep a record of these observations. If visible emissions are detected, the permittee shall immediately undertake corrective actions to identify the cause of the visible emissions, implement corrective actions, and document that there are no visible emissions following the corrective actions. The permittee shall maintain records of all corrective actions taken following the observance of visible emissions. These records shall include the cause of the visible emissions, what action was taken to correct the problem, and if visible emissions were detected after the corrective action was taken.

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SN-06, SN-07, SN-10A, SN-10B, SN-13, SN-16A, and SN-16B
Drying Kilns and Boiler

Source Description

All of the lumber processed at this facility is sent to either one of the three natural gas fired kilns or a steam heated kiln. Of the three natural gas fired kilns, one is heated by a 24 MM BTU/ hr burner (Kiln #2 - SN-06) and the other two are each heated by two 15 MM BTU/ hr burners (Kiln #3 - SN-07 and Kiln #1 - SN-13). These three kilns all have closed loop systems which recirculate the hot air. The fourth and the fifth kilns (Kiln #4 - SN-10B, Kiln #5 - SN-16B) are each heated with steam produced by two sets of two boilers each (SN-10A and SN-16A) with each set having a heat input capacity of 48.76 MM BTU/hr. Under this permit, the facility will be converting Kiln #2 from a direct-fired kiln to a steam-heated kiln. The permittee will be using excess steam from sources SN-10A and SN-16A to heat the kiln.

All of the natural gas fired sources are permitted to operate at capacity for 8,760 hours per year. Therefore, no gas usage limits or recordkeeping requirements have been placed in the permit.

Specific Conditions

15. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The hourly rates listed below are based on the capacity of the equipment. Compliance with the annual emission rates will be demonstrated by firing only natural gas and through the limit on the amount of board feet that may be processed at this facility.

SN	Pollutant	lb/hr	tpy
06	PM ₁₀	0.4	1.5
	SO ₂	0.1	0.1
	VOC	19.3	29.8
	CO	0.9	3.9
	NO _x	0.8	3.2
07	PM ₁₀	0.5	1.8
	SO ₂	0.1	0.1
	VOC	24.5	104.1
	CO	1.2	4.9
	NO _x	0.9	4.0

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SN	Pollutant	lb/hr	tpy
10A	PM ₁₀	0.7	2.9
	SO ₂	0.1	0.1
	CO	1.8	7.9
	NO _x	1.5	6.4
13	PM ₁₀	0.5	1.8
	SO ₂	0.1	0.1
	VOC	24.5	104.1
	CO	1.2	4.9
	NO _x	0.9	4.0
16A	PM ₁₀	0.7	2.9
	SO ₂	0.1	0.1
	CO	1.8	7.9
	NO _x	1.5	6.4

16. Pursuant to §19.501 et seq and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The hourly emission rates listed below are based on the capacity of the equipment. Compliance with the annual rates for the boilers will be demonstrated by firing only natural gas. Compliance with the annual rates for the kilns will be demonstrated through the limits on the amount of board feet that may be dried in each kiln.

SN	Pollutant	lb/hr	tpy
10A	VOC	0.3	1.2
10B	VOC	61.3	122.5
16A	VOC	0.3	1.2
16B	VOC	61.3	122.5

17. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. Compliance with these emission rates will be demonstrated by firing only natural gas.

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SN	Pollutant	lb/hr	tpy
06	PM	0.4	1.5
07	PM	0.5	1.8
10A	PM	0.7	2.9
13	PM	0.5	1.8
16A	PM	0.7	2.9

18. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from sources SN-06, SN-07, SN-10A, SN-13, and SN-16A as measured by EPA Reference Method 9. Compliance with these opacity limits will be demonstrated through compliance with Specific Conditions 19 and 20.
19. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall use only pipeline quality natural gas to fire sources SN-06, SN-07, and SN-13.
20. Pursuant to §19.901 et seq of Regulation 19, 40 CFR Part 52, Subpart E, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall use only pipeline quality natural gas to fire source SN-10A and SN-16A.
21. Pursuant to §19.705 of Regulation 19, §19.901 et seq of Regulation 19, 40 CFR Part 52, Subpart E, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not dry in excess 70 million board feet in any consecutive twelve month period at source SN-10B.
22. Pursuant to §19.705 of Regulation 19 and §19.901 et seq of Regulation 19, 40 CFR Part 52, Subpart E, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not dry in excess of 70 million board feet in any consecutive period at source SN-16B.

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23. Pursuant to §19.705 and §19.901 et seq of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the board feet of lumber dried at sources SN-10B and SN-16B in order to demonstrate compliance with Specific Conditions 21 and 22 which may be used by the Department for enforcement purposes. These records shall be updated no later than the tenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. The next submittal shall be due February 1, 2001, and shall include data from the months January 2000 through December 2000.
24. Sources SN-10A and SN-16A are subject to 40 CFR Part 60, Subpart A, *General Provisions*, and 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* due to installation dates after 1989 and heat input capacities greater than 10 MM BTU/hr. A copy of Subpart Dc has been included in Appendix A. The requirements of this subpart are outlined in the following specific conditions.
25. Pursuant to §19.705 and §19.303 of Regulation 19 and 40 CFR 60.48c(g), the permittee shall maintain records of the amount of fuel combusted during each month SN-10A and SN-16A. The NSPS requires facilities to record the daily amounts of fuel used. However, the Department has been granted permission to only require monthly recording when the boiler burns only natural gas. This determination may be found in the EPA's Determination Detail (Control Number: 9300003).
26. Pursuant to §19.303 of Regulation 19 and 40 CFR 60.48c(i), the permittee shall maintain all records required by Specific Condition 25 for a period of two years following the date of such record.

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SN-11
Tub Grinder

Source Description

Source SN-11 is a 280 hp diesel fired tub grinder. The throughput at this source is based upon an annual lumber production rate of 203 MM board feet.

Specific Conditions

27. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at source SN-11. The hourly emission rates listed below are based on the capacity of the equipment. Compliance with the annual emission rates will be demonstrated through the limit on the hours of operation.

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.3
SO ₂	0.6	1.3
VOC	0.8	1.6
CO	1.9	4.2
NO _x	8.6	19.4

28. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-11. The hourly emission rate listed below is based on the capacity of the equipment. Compliance with the annual emission rate will be demonstrated through the limit on the hours of operation.

Pollutant	lb/hr	tpy
PM	0.8	1.9

29. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-11.

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30. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, weekly observations of the opacity from source SN-11 shall be conducted by a person trained, but not necessarily certified, in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the excess visible emissions. After corrective action has been taken, the permittee shall conduct another observation of the opacity from the source in question in order to verify that excess visible emissions are no longer present. The permittee shall maintain records of all visible emissions observations, the cause of any excess visible emissions, and any corrective action taken. These records shall be kept on site and made available to Department personnel upon request.
31. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and §18.1004 of Regulation 18, the permittee shall use only diesel fuel to fire the tub grinder.
32. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and §18.1004 of Regulation 18, the permittee shall not operate the tub grinder in excess of 4500 hours in any consecutive twelve month period.
33. Pursuant to §19.705 of Regulation 19 and 40 CFR 52, Subpart E or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of the hours of operation of the tub grinder in order to show compliance with Specific Condition 32 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the tenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7. The next submittal shall be due February 1, 2001, and shall include data from the months January 2000 through December 2000.

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SN-14 and SN-15
Dual Compartment Storage Tank

Source Description

This dual compartment storage tank is used to store fuel for plant vehicles and the tub grinder. This tank is not subject to an NSPS subpart due to size. The 2,000 gallon compartment has been designated as source SN-14 while the 10,000 gallon compartment has been designated as source SN-15.

Specific Conditions

34. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. Compliance with these emission rates will be demonstrated through the limits on the types and the amounts of materials that may be stored in the tanks.

SN-#	Pollutant	lb/hr	tpy
14	VOC	1.0	0.2
15	VOC	0.1	0.1

35. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall store only gasoline at SN-14.
36. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, throughput at SN-14 shall not exceed 24,000 gallons of gasoline in any consecutive twelve month period.
37. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of gasoline throughput at SN-14 in order to show compliance with the above specific condition and which may be used by the Department for enforcement purposes. These records shall be updated no later than the tenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7. The next submittal shall be due February 1, 2001, and shall include data from the months January 2000 through December 2000.

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38. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall store only diesel fuel at SN-15.
39. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, throughput at SN-15 shall not exceed 180,000 gallons of diesel fuel in any consecutive twelve month period.
40. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of diesel fuel throughput at SN-15 in order to show compliance with the above specific condition and which may be used by the Department for enforcement purposes. These records shall be updated no later than the tenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7. The next submittal shall be due February 1, 2001, and shall include data from the months January 2000 through December 2000.

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COMPLIANCE PLAN

Freeman Brothers, Inc. d.b.a. Bibler Brothers Lumber Company - West Facility is in compliance with the applicable regulations cited in the permit application. Freeman Brothers, Inc. d.b.a. Bibler Brothers Lumber Company - West Facility will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not process more than 203 million board feet of lumber in any consecutive twelve month period.
2. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of board feet processed in order to show compliance with Plantwide Condition #1 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the tenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7. The next submittal shall be due February 1, 2001, and shall include data from the months January 2000 through December 2000.
3. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall water all haul roads as necessary in order to reduce fugitive emissions.
4. Pursuant to §26.8 of Regulation 26, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee may initiate new production programs without a permit modification provided that no permit conditions are violated. The permittee shall notify the Department at least fifteen working days prior to the implementation of any new production program. This notification shall include the following items: a description of the new program, the date when the new program will be implemented, whether the new program is temporary or permanent, the length of time the program will take if it is temporary, annual and hourly emission calculations, and a comparison of the new emission rates to the currently permitted emission rates.
5. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
6. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.

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7. Pursuant to §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, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §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, the permittee shall provide:
 - 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. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
10. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.
11. Pursuant to §18.801 of Regulation 18, the permittee shall 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.
12. Pursuant to §18.901 of Regulation 18, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants from becoming airborne.

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13. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall submit the annual compliance certification on February 1 of each year. However, this does not relieve the permittee of the responsibility of submitting the annual compliance certification which is due on April 1, 2000.

Permit Shield

14. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:

- A. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated May 9, 1997.

Source No.	Regulation	Description
Facility	19	SIP
Facility	26	Arkansas Operating Permit Regs.

- B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated May 9, 1997.

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	40 CFR Part 60, Subpart Dc	SN-06, SN-07, and SN-13	These sources are direct heated and do not meet the definition of a steam generating unit.
Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after 6/11/73 and prior to 5/19/78	40 CFR Part 60, Subpart K	SN-14 and SN-15	These sources both have capacities less than 40,000 gallons.
Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after 5/18/78 and prior to 7/23/84.	40 CFR Part 60, Subpart Ka	SN-14 and SN-15	These sources both have capacities less than 40,000 gallons.

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Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
Standards of Performance for Storage Vessels for Volatile Organic Liquids (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after 7/23/84.	40 CFR Part 60, Subpart Kb	SN-14 and SN-15	These sources both have capacities less than 40,000 gallons.
National Emission Standards for Hazardous Air Pollutants	40 CFR Part 61	Facility	This facility does not manufacture, process and/or otherwise use any of the HAPs specified in these requirements.
National Emission Standards for Hazardous Air Pollutants for Source Categories	40 CFR Part 63	Facility	At the time of the issuance of this permit, there are no subparts of 40 CFR Part 63 which are potentially applicable to this facility.

C. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

The liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance;

The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or

The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

Title VI Provisions

15. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:

A. All containers containing a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.

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- B. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - C. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - D. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
16. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- A. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - B. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - C. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - D. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
 - E. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - F. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
17. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
18. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

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The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or systems used on passenger busses using HCFC-22 refrigerant.

19. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program.

SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated July 14, 1999.

The application did not identify any insignificant activities that are required to be specifically listed in the permit.

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

1. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.
2. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.
4. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
5. Consumer use of office equipment and products, not including commercial printers or business primarily involved in photographic reproduction.
6. Janitorial services and consumer use of janitorial products.
7. Internal combustion engines used for landscaping purposes.
8. Laundry activities, except for dry-cleaning and steam boilers.

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9. Bathroom/toilet emissions.
10. Emergency (backup) electrical generators at residential locations.
11. Tobacco smoking rooms and areas.
12. Blacksmith forges.
13. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
14. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.¹
15. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface-coating or products.
16. Portable electrical generators that can be "moved by hand" from one location to another.²
17. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.

¹ Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

² "Moved by hand" means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

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18. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.³
19. Air compressors and pneumatically operated equipment, including hand tools.
20. Batteries and battery charging stations, except at battery manufacturing plants.
21. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.⁴
22. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and no volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
23. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
24. Drop hammers or presses for forging or metalworking.
25. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
26. Vents from continuous emissions monitors and other analyzers.
27. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
28. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.

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Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

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Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

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29. Lasers used only on metals and other materials which do not emit HAPs in the process.
30. Consumer use of paper trimmers/binders.
31. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
32. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
33. Laser trimmers using dust collection to prevent fugitive emissions.
34. Bench-scale laboratory equipment used for physical or chemical analysis not including lab fume hoods or vents.
35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
37. Hydraulic and hydrostatic testing equipment.
38. Environmental chambers not using hazardous air pollutant gases.
39. Shock chambers, humidity chambers, and solar simulators.
40. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
41. Process water filtration systems and demineralizers.
42. Demineralized water tanks and demineralizer vents.
43. Boiler water treatment operations, not including cooling towers.
44. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.

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45. Oxygen scavenging (de-aeration) of water.
46. Ozone generators.
47. Fire suppression systems.
48. Emergency road flares.
49. Steam vents and safety relief valves.
50. Steam leaks.
51. Steam cleaning operations.
52. Steam and microwave sterilizers.
53. Site assessment work to characterize waste disposal or remediation sites.
54. Miscellaneous additions or upgrades of instrumentation.
55. Emissions from combustion controllers or combustion shutoff devices but not combustion units itself.
56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).
57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
58. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
59. Residential wood heaters, cookstoves, or fireplaces.
60. Barbecue equipment or outdoor fireplaces used in connection with any residence or recreation.
61. Log wetting areas and log flumes.
62. Periodic use of pressurized air for cleanup.
63. Solid waste dumpsters.

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64. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.
65. Natural gas odoring activities unless the Department determines that emissions constitute air pollution.
66. Emissions from engine crankcase vents.
67. Storage tanks used for the temporary containment of materials resulting from an emergency reporting to an unanticipated release.
68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
69. Mixers, blenders, roll mills, or calendars for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.
70. The storage , handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to the equipment only).
71. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
72. Tall oil soap storage, skimming, and loading.
73. Water heaters used strictly for domestic (non-process) purposes.
74. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
75. Agricultural operations, including onsite grain storage, not including IC engines or grain elevators.
76. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which 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 which 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. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
 - A. The date, place as defined in this permit, and time of sampling or measurements;
 - B. The date(s) analyses were performed;
 - C. The company or entity that performed the analyses;
 - D. The analytical techniques or methods used;
 - E. The results of such analyses; and
 - F. The operating conditions existing at the time of sampling or measurement.

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6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

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

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the occurrence. The initial report may be made by telephone and shall include:
 - A. The facility name and location,
 - B. The process unit or emission source which is deviating from the permit limit,
 - C. The permit limit, including the identification of pollutants, from which deviation occurs,
 - D. The date and time the deviation started,
 - E. The duration of the deviation,
 - F. The average emissions during the deviation,
 - G. The probable cause of such deviations,
 - H. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - I. The name of the person submitting the report.

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A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.

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14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.
19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - A. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

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- B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - C. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - D. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
- A. The identification of each term or condition of the permit that is the basis of the certification;
 - B. The compliance status;
 - C. Whether compliance was continuous or intermittent;
 - D. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - E. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:
- A. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - B. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - C. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - D. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

APPENDIX A

INVOICE REQUEST FORM

PDS- _____

Date October 11, 2001

Air

CSN 58-0014

Facility Name Freeman Brothers, Inc. d.b.a. Bibler Brothers Lumber Company - West Facility

Invoice Mailing Address P.O. Box 490, Russellville, AR 72811

Modification

Permit Number 1628-AOP-R2

Permit Description Title 5

Permit Fee Code A

Amount Due \$ 2632

Engineer Loretta Reiber

Paid? No - they haven't been sent an invoice yet

Comments: **Air Permit Fee Calculation**

$[16.9 \text{ (PM)} + 123.5 \text{ (VOC)} + 2.1 \text{ (NO}_x\text{)}] * 18.47 = 2632$

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Pollution Control and Ecology gives the following notice:

Freeman Brothers, Inc. d.b.a. Bibler Brothers Lumber Company - West Facility operates a lumber mill located along U.S. Highway 7 South in Pope County near Russellville. Permit #1628-AOP-R2 will be the third operating permit issued to this facility under Regulation 26. Bibler Brothers is proposing to install a new lumber drying kiln and associated boilers. Along with the installation of the new kiln and boilers, this facility is also proposing to increase permitted lumber production by 23 million board feet per year. The facility is also converting its #2 Kiln from direct-fired to steam heated. Excess steam from the #4 Kiln and the #5 Kiln boilers will be used to heat the #2 Kiln. The new kiln and boilers will have permitted VOC emissions in excess of the PSD Significant Increase Level. Bibler Brothers has submitted a PSD permit application to address the BACT and the ambient air impact analysis. Permitted emissions of other criteria pollutants will be increasing with the issuance of this permit. However, none of those increases are above the respective PSD Significant Increase Levels.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp, Information Officer. Citizens desiring technical information concerning the application or permit should contact Loretta Reiber, Engineer. Both Rhonda Sharp and Loretta Reiber can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone (501) 682-0744.

Copies of the draft permit and permit application have been placed at the Pope County Library, 114 East Third Street, Russellville, Arkansas 72801. This information may be reviewed during the Department's normal business hours.

Interested or affected persons may also submit written comments on the proposed modifications to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology's Commission Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Randall Mathis
Director