

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1812-AR-1

IS ISSUED TO:

North Pacific Lumber Company
Highway 65 South
Western Grove, AR 72685
Searcy County
CSN: 65-0151

THIS PERMIT IS YOUR 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 YOUR 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:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE: North Pacific Lumber Company
CSN: 65-0151
PERMIT NUMBER: 1812-AR-1

FACILITY ADDRESS: Highway 65 South
Western Grove, AR 72685

COUNTY: Searcy

CONTACT POSITION: Walter Popejoy, Plant Manager
TELEPHONE NUMBER: (870)-429-5070

REVIEWING ENGINEER: Paula Parker

UTM North-South (Y): 3994.8
UTM East-West (X): 503.7

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SECTION II: INTRODUCTION

Summary

North Pacific Lumber Company operates lumber drying facility south of Western Grove on Highway 65 in Searcy County. This permit modification allows for an increase in the materials used in SN-04, from 440 gallons to 550 gallons for the antifungal dip and 220 to 550 gallons of pH balancing solution, limited in gallons per year. There is a slight increase in VOC/HAPS emissions due to this change.

Process Description

Rough lumber is delivered to the facility. This lumber is then placed in a dip tank (SN-4) which contains an antifungal chemical. The ends of the finished lumber are coated with a waxy material, (SN-5), and then the rough lumber is placed into the lumber yard where it is allowed to dry for a period of time. The air dried lumber is then transferred to steam-heated drying kilns (SN-3) to further reduce the moisture content of the lumber. The kiln-dried lumber then proceeds to the sawing and planing operations, where it is processed into finished lumber.

Emissions from the wood working operations are controlled by a cyclone (SN-2). Emissions from the wood hog which processes the end pieces and other scraps are also routed to this cyclone. The woodwaste collected by the cyclone is transferred to a storage bin prior to being transported to the boiler for use as fuel.

The boiler (SN-1a and SN-1b) provides steam for the drying kilns. It uses wood-gasification technology. The wood waste fuel and combustion air are fed to the burner. The proportions of the air and fuel fed to the burner are controlled in order to operate the burner at the optimum temperature to achieve maximum gas production. The amount of oxygen in this burner is supplied so that it is insufficient for complete combustion. The combustion gasses are drawn off by an induced draft fan. Secondary air is then blended with the combustion gasses, and complete combustion takes place in the boiler fire tube. Emissions from the burner are sent to a baghouse to control any fly ash carry over. The boiler has two stacks. The secondary stack, (SN-01b), between the burner and the boiler is used only during upset conditions. All emissions during normal operation are routed through the multiclone and out the primary stack. The boiler has a maximum heat input of 8.28 MMBTU/hr.

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Regulations

The North Pacific Lumber Company is subject to all applicable provisions of the *Arkansas Air Pollution Control Code* (Regulation 18) and the *Arkansas Plan for Implementation of Air Pollution Control* (Regulation 19).

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	5.0	22.6
PM ₁₀	4.8	20.7
SO ₂	0.2	0.7
VOC	28.1	24.4
CO	2.6	11.2
NO _x	1.9	8.1
TOTAL HAPs	20.5	6.0

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SECTION III: PERMIT HISTORY

1812-A First permit issued to this facility on June 8, 1999.

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SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

- Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) 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.

SN	Description	Pollutant	lb/hr	tpy
01a, 01b	Wood-Fired Boiler (8.28 MM BTU/hr)	PM₁₀	2.4	10.5
		NO_x	1.9	8.1
		CO	2.6	11.2
		VOC	0.3	0.9
		SO₂	0.2	0.7
02	Wood Working Cyclone	PM₁₀	2.4	10.2
03	Lumber Drying Kilns (3)	VOC	7.0	17.5
04	Dip Tank	VOC	3.9	3.9
05	End Coating	VOC	14.3	1.5

- Pursuant to §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, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
01a, 01b	Wood-Fired Boiler (8.28 MM BTU/hr)	PM	2.8	12.3
02	Wood Working Cyclone	PM	2.4	10.2
04	Dip Tank	HAPs	3.9	3.9
05	End Coating	HAPs	14.3	1.5

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3. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
01a, 01b	20	§18.501
02	20	§18.501

4. 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 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.
5. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.
6. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 10,000 thousand board feet of lumber **through the kilns at the facility in any twelve consecutive month rolling period.**
7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #6. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. A twelve month rolling average and each individual month's data shall be submitted in accordance with General Condition 6.
8. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, **the permittee is subject to the following limits on VOC and HAP containing materials in sources SN-04 and SN-05. The permittee shall not use an amount of a VOC or HAP containing material in any consecutive 12 month period greater than the usage limit specified in the following table. The permittee shall not use a material with HAP or VOC concentrations higher than limits specified in the**

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following table. These VOC and HAP concentrations of these chemicals should be verified by manufacturer's MSDS or equivalent. The permittee shall not use a material containing a HAP with a TLV less than the TLV limit specified in the following table.

Source	Material	Usage Limit (per year)	VOC Limit	HAP Limit	Minimum HAP TLV
04	Antifungal Dip	550 gal	9 lb/gal	9 lb/gal	120 mg/m ³
	pH balancing solution	550 gal	5 lb/gal	5 lb/gal	120 mg/m ³
05	End Coating	2860	1 lb/gal	1 lb/gal	262 mg/m ³

- Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall keep records to show compliance with Specific Condition 7. These records shall include the amount of each material purchased, the VOC and HAP concentrations in each and the TLV of the HAPs in the material. Glycol Ethers will be considered to have a TLV of 120 mg/m³. These records shall be updated by the 15th day of month following the month which the records represent. These records shall be kept on site and made available to Department personnel upon request.

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V: INSIGNIFICANT ACTIVITIES

The following types of activities or emissions are deemed 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.

Description	Category
NONE	

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SECTION VI: GENERAL CONDITIONS

1. 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 A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall 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 thereunder.
3. Pursuant to §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, the Department 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.
4. Pursuant to §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, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §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, records must be kept for five years which will 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 records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

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6. Pursuant to §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, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

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

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/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, 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 §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, if the permittee exceeds an

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emission limit established by this permit, they shall be deemed in violation of said permit and shall 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:

- 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 that all reasonable measures have been taken 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 shall 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, it need not be submitted again.
11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
- 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
 - e. To perform an operation and maintenance inspection of the permitted source

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12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued 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.
13. Pursuant to §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, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §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, this permit may be transferred. An applicant for a transfer shall 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) 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. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. 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.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.

INVOICE REQUEST FORM

PDS-

Date July 2, 2003

<input checked="" type="checkbox"/>	Air
<input type="checkbox"/>	NPDES
<input type="checkbox"/>	Stormwater
<input type="checkbox"/>	State Permits Branch
<input type="checkbox"/>	Solid Waste

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Facility Name North Pacific Lumber Company

Invoice Mailing Address P.O. Box 40, Western Grove, AR 72685

<input type="checkbox"/>	Initial
<input checked="" type="checkbox"/>	Modification
<input type="checkbox"/>	Annual

Permit Number 1812-AR-1

Permit Description Minor Source

Permit Fee Code A

Amount Due \$ 400

Engineer Paula Parker

Paid? No Yes Check #

Comments: **Air Permit Fee Calculation**

Change in VOCs (predominant) = 1.9 tpy

Minimum fee, \$400

APPENDIX A