

# OPERATING AIR PERMIT

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

Permit #: 189-AOP-R3

IS ISSUED TO:

Bean Lumber Co., Inc.  
Highway 8 North  
Glenwood, AR 71943  
Pike County  
CSN: 55-0017

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:

June 8, 1999

and

June 7, 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Keith A. Michaels

Date Modified

**SECTION I: FACILITY INFORMATION**

**Bean Lumber Co., Inc.**  
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PERMITTEE: Bean Lumber Co., Inc.  
CSN: 55-0017  
PERMIT NUMBER: 189-AOP-R3

FACILITY ADDRESS: Highway 8 North  
Glenwood, AR 71943

COUNTY: Pike

CONTACT POSITION: Ethan Lightfoot, Environmentalist  
TELEPHONE NUMBER: (870) 356-4165

REVIEWING ENGINEER: David Triplett

UTM North-South (X): 3799.4 km  
UTM East-West (Y): 448.0 km

## **SECTION II: INTRODUCTION**

### **Summary**

**Bean Lumber Company, Inc. owns and operates a lumber sawmill located on Highway 8**

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**North in Glenwood, Arkansas. This permit modification is being issued in order to allow for the expansion of the capacity of the wood-waste boiler located on-site (SN-01). The capacity of the Wellons Boiler will increase from 125,000 pounds per hour of steam generation to 155,000 pounds per hour. Additionally, a new curve saw will be installed in the saw mill. This saw is constructed in such a manner that all sawdust generated is captured within the cutting machine. The captured sawdust is then transferred to the sawdust loadout area (SN-05A and SN-12) or to the boiler (SN-01) for use as fuel. Particulate emissions from the boiler have been re-calculated using the 0.1 lb/MMBtu New Source Performance Standard (NSPS) limit found in 40 CFR Part 60 Subpart Db. Previous particulate limits for the source had been calculated based on test data from the facility.**

**Due to the increase in capacity at the boiler and changes to several emission factors, permitted emissions from this source will increase by 104.8 tons per year (tpy) of particulate matter (PM), 94.6 tpy of particulate matter smaller than 10 microns (PM<sub>10</sub>), 1.7 tpy of SO<sub>2</sub>, 0.7 tpy of VOC, 6.7 tpy of CO, and 25.2 tpy of NO<sub>x</sub>. This facility will continue to be classified as a minor source with respect to Prevention of Significant Deterioration (PSD) regulations at this time.**

### **Process Description**

**Bean Lumber Company, Inc., currently operates a lumber saw mill and treating plant in Glenwood, Arkansas. Logs received at the facility are placed on the saw racks where they are cut to the most desirable lengths in order to get the longest boards possible. The logs then go through the debarker. The bark is removed and conveyed to a hog where it is ground and fed into the boiler (SN-01) as fuel.**

**The logs move through the saw mill to be cut to the optimum size in order to realize the best yield for each log. The wood that is undesirable for boards is sent to the chipping machine to be converted into chips. After the logs are cut into boards, the boards are mechanically sorted by dimension and stacked.**

**The lumber is transferred by a fork lift to a storage area to be held until it is sold as green lumber or to one of the four dry kilns for steam drying (SN-02, SN-03, SN-04, and SN-04A). After the lumber is dried, it is placed in a cooling shed. From the cooling shed the lumber is planed and trimmed at the planer mill.**

**The shavings and dust from the planer mill are sent to the planer mill cyclone (SN-05), then to the truck loading bin cyclone (SN-06). From the storage bin cyclone, the wood waste is dumped into trucks and hauled offsite (SN-05A and SN-12). The lumber is stacked in predetermined amounts, bundled, and stored ready for shipping by truck or rail.**

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**Wood-Fired Steam Boiler:**

Steam required for the facility is generated by a Wellons boiler (SN-01) which was originally rated at 125,000 pounds per hour steam generation and nominally rated at 7,500 KW electrical power generating capacity, utilizing a used turbine-generator unit. The boiler uses sawdust, bark, and other wood waste as fuel. The fuel is fed to the burner on moving grates with no manual raking. The boiler is equipped with an electrostatic precipitator to reduce the exhaust stack particulate emissions and a continuous monitor for opacity of the stack emissions.

This boiler is being expanded as part of this modification to a new capacity of 155,000 pounds per hour of steam generation and 9,300 KW electrical power generating capacity. This expansion is being accomplished by modifying various parts of the combustion process, including expanding the size of the firebox, increasing the speed of the wood-waste feed system, and increasing the speed of the air-supply fan.

The following activities are operated under the business name of Curt Bean Lumber Co., Inc.

**Shipping and Receiving:**

The lumber purchased by the facility is delivered by truck. When the lumber is delivered, it is either stored in a shed to wait to be treated or sold as white lumber. The other lumber is unloaded in the open storage to be tagged and readied for the treating process.

**Woodshop:**

The Woodshop has several different saws and equipment to further process wood for the market's needs. This shop is designed to do the work in small batches. This adds versatility to meet the ever-changing needs of the customers.

**Wood Treatment:**

The wood is pressure treated with Arsenical Compound consisting of copper, chromate and arsenate, inorganic mixture in water. Then the lumber is tagged, treated, placed on the drip pad for the necessary time to drain, and then moved to open storage ready for shipping. There are no emissions from this process.

**Staining or Painting:**

The staining or painting is a process in which boards are fed into a paint booth that sprays and rolls the water based paint or stain on the lumber. VOC emissions are "bubbled" under SN-14.

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**Miscellaneous Sources:**

SN-08 and SN-09 are both 8,000 gallon gasoline storage tank, and SN-10 is a 14,000 gallon dual compartment diesel storage tank. All three of these tanks have insignificant emissions. SN-11 and SN-12 are the Cyclone and Bin Loadout associated with the Woodshop.

**Regulations**

This facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Regulation 18), the *Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulations of the Arkansas Operating Air Permit Program* (Regulation 26). The wood-fired boiler (SN-01) is subject to 40 CFR Part 60 Subpart Db - *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*, and the 14,000 gallon dual-compartment fuel tank (SN-10) is subject to the record keeping requirements of 40 CFR 60.116b(a) and (b).

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table.

EMISSION SUMMARY				
Source	Description	Pollutant	Emission Rates	Cross

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			lb/hr	tpy	
Total Allowable Emissions		PM	95.2	165.5	N/A
		PM <sub>10</sub>	32.7	139.3	
		SO <sub>2</sub>	2.2	9.4	
		VOC	55.7	237.9	
		CO	55.8	237.7	
HAPs are included in VOCs		NO <sub>x</sub>	55.8	237.7	
Metals are included in PM/PM <sub>10</sub>		Benzene	0.30	1.24	
		Formaldehyde	0.24	1.03	
		Phenol	0.01	0.02	
		Chromium VI	0.01	0.01	
		Chlorine	0.23	0.98	
		Cobalt	0.01	0.02	
		Arsenic	0.01	0.02	
		Cadmium	0.01	0.01	
		Lead Compounds	0.02	0.06	
		Manganese	0.37	1.57	
		2,3,7,8-Tetrachlorodibenzo- p-dioxin	1.05E-9	4.48E-9	
		POM*	0.02	0.05	
01	Wellons Boiler	PM	26.6	113.2	10
		PM <sub>10</sub>	24.0	101.9	
		SO <sub>2</sub>	2.2	9.4	
		VOC	1.0	3.9	
		CO	55.8	237.7	
		NO <sub>x</sub>	55.8	237.7	
		Benzene	0.30	1.24	
		Formaldehyde	0.24	1.03	
		Phenol	0.01	0.02	
		Chromium VI	0.01	0.01	
		Chlorine	0.23	0.98	
		Cobalt	0.01	0.02	
		Arsenic	0.01	0.02	
		Cadmium	0.01	0.01	
		Lead Compounds	0.02	0.06	
		Manganese	0.37	1.57	
		2,3,7,8-Tetrachlorodibenzo- p-dioxin	1.05E-9	4.48E-9	
		POM*	0.02	0.05	
02	Dry Kiln #1				

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
03 04 04A	Dry Kiln #2 Dry Kiln #3 Dry Kiln #4	VOC "Bubbled"	52.5	229.8	14
05	Truck Loading Bin Cyclone	PM PM <sub>10</sub>	1.3 1.3	5.4 5.4	15
05A and 12	Sawdust Bin Loadout	PM PM <sub>10</sub> (Bubbled)	60.0 0.1	15.0 0.1	17
06	Planer Mill Cyclone	PM PM <sub>10</sub>	6.7 6.7	29.3 29.3	15
07	There is no source of emissions for SN-07				
08	Fuel Tanks	Moved to Insignificant Activities List			
09	Gasoline Tanks	Moved to Insignificant Activities List			
10	Fuel Tanks	Moved to Insignificant Activities List			
11	Woodshop Cyclone	PM PM <sub>10</sub>	0.6 0.6	2.6 2.6	15
13	There is no source of emissions for SN-13				
14	Staining Operations	VOC	2.2	4.2	19

\* Polycyclic Organic Matter.

### SECTION III: PERMIT HISTORY

The initial permit for the facility, permit # 189-A, was issued in June of 1986. This permit required the permittee to not exceed 1.0 pound of particulates per hour from the cyclone and 15.5 gallons of VOCs per hour in the coatings area.

**The facility modified its existing air permit, #189-AR-1, in March of 1997, to incorporate the emissions from unpermitted sources and new boiler emissions. The facility modifications were as follows:**

1. to replace the existing boiler with a Wellons wood-fired boiler (SN-01). The facility proposed to replace an existing wood-fired boiler with a new Wellons wood-fired boiler rated at 125,000 lb/hr. This boiler is equipped with an electric cogeneration capability;
2. **to increase the lumber processing rate in the planer mill;**
3. **to increase the lumber processing rate in the drying kilns;**
4. to include the air pollutants emissions from the wood waste boiler (SN-01), emissions from the kilns (SN-02, SN-03, and SN-04), and the emissions from the other sources (SN-05, SN-05A, SN-06, SN-11, SN-12, and SN-14);
5. **to address its major source status, and to show it had not circumvented/not been subject to Prevention of Significant Deterioration (PSD) review in the past. The facility was determined to have been below 250 tpy for all pollutants prior to this modification. This modification increased the permitted VOC emission limit to greater than 250 tpy, which triggered PSD "major source" status for the facility at this time.**



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Permit No. 189-AOP-R0 (issued on June 8, 1999) was the first Operating Permit issued to Bean Lumber Company, Inc. - Glenwood Plant under Regulation 26. The permit application included one new Dry Kiln (SN-04A) and changed the designations of the sawdust emission sources, adding a Sawdust Bin Loadout (SN-05A). The facility is classified under SIC code 2421. Total particulates were 136.1 tpy, lower than the previous permit limit because of revised emission factors. PM<sub>10</sub> emission rates were quantified for the first time at 84.1 tpy, using recent AP-42 factors. Total HAPs were less than 2 tpy, with speciated heavy metals included in the particulates at less than 1 tpy.

**Permit No. 189-AOP-R1 was issued Bean Lumber Company on December 14, 1999. This modification was issued in order to account for several changes since the issuance of permit 189-AOP-R0. These changes included an increase in the lumber throughput in the woodshop (SN-11) from 16.2 MM to 60 MM board feet of lumber per year, and the replacement of the 30,000 gallon above ground fuel storage tank (formerly SN-10) with a new, double compartment tank (SN-10). The new tank stores 10,000 gallons of diesel fuel for over the road use in one compartment, and 4,000 gallons of non tax fuel for use in fork lifts and off road equipment in the other compartment. The increase in woodshop throughput resulted in PM emissions increasing by 1.9 tpy. The emissions from the new tank were 0.2 tpy of VOC, which is below PSD significant levels. Additionally several administrative changes were made to the source description for SN-08, SN-09, and SN-10. Additionally, the throughput at Drying Kiln #4 (SN-04A) was limited to 25.8 million board feet per year in order to avoid PSD review. Emission limits in this permitting action were quantified at: 138.0 tpy of PM, 84.4 tpy of PM<sub>10</sub>, 8.0 tpy of SO<sub>2</sub>, 280.5 tpy of VOC, 231.0 tpy of CO, and 212.5 tpy of NO<sub>x</sub>.**

Permit No. 189-AOP-R2 was issued to Bean Lumber Company on May 1, 2001. This modification was issued **in order to allow for the inclusion of lower emission rates calculated from stack test data for the wood-waste boiler (SN-01), as well as to allow for changes in compliance mechanisms for various other permitted limits. Due to the new boiler emission limits, this permitting action resulted in a decrease in emissions from the boiler of : 75.4 tpy PM<sub>10</sub>, 84.1 tpy PM, 0.3 tpy SO<sub>2</sub>, and 70.7 tpy VOC. Additionally, the allowable throughput of the lumber drying kilns was increased in this modification to 148,258 thousand board feet (MBF) per year, which increases VOC emissions from the kilns by 28.0 tpy. This resulted in a net VOC emissions decrease of 42.7 tpy in this modification. As a result of the new, lower VOC emission limit, this facility was no longer considered a major source for the purposes of Prevention of Significant Deterioration (PSD) applicability.**

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**SECTION IV: EMISSION UNIT INFORMATION**

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**SN-01**

Wellons Wood-Fired Boiler

**Source Description**

Power required for the facility is generated by a Wellons boiler (SN-01) which is rated at 155,000 PPH steam generation system and a nominally rated 9,300 KW electrical power generating unit utilizing a used turbine-generator unit. The boiler uses sawdust, bark, and other wood waste as fuel. The boiler is equipped with an electrostatic precipitator to reduce the exhaust stack particulate emissions. A Rosemount opacity monitor continuously indicates the opacity of the exit gases and determines the 6-minute average opacity readings as required.

This boiler was modified in 2001 to increase its capacity from 125,000 pounds per hour of steam to 155,000 pounds per hour. This expansion was accomplished by increasing the size of the firebox, the speed of the fan, and the speed of the fuel delivery system to the boiler.

**Specific Conditions**

1. Pursuant to §19.501 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with the emissions limits below shall be demonstrated by compliance with Specific Conditions #7 and #11.

Pollutant	Emission Rate lb/hr	Emission Rate tpy
PM <sub>10</sub>	24.0	101.9
SO <sub>2</sub>	2.2	9.4
VOC	1.0	3.9
CO	55.8	237.7
NO <sub>x</sub>	55.8	237.7

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 at SN-01 the emission rates set forth in the following table. Compliance with the emissions limits below shall be demonstrated by compliance with Specific Conditions #7 and #11.

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HAP	Emission Rate lb/hr	Emission Rate tpy
PM	26.6	113.2
Benzene	0.30	1.24
Formaldehyde	0.24	1.03
Phenol	0.01	0.02
Chromium VI	0.01	0.01
Chlorine	0.23	0.98
Cobalt	0.01	0.02
Arsenic	0.01	0.02
Cadmium	0.01	0.01
Lead Compounds	0.02	0.06
Manganese	0.37	1.57
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1.05E-9	4.48E-9
POM*	0.02	0.05

\* Polycyclic Organic Matter.

3. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.40b, the wood-waste-fired boiler (SN-01) is subject to NSPS Standard 40 CFR, Part 60, Subpart A, General Provisions and 40 CFR, Part 60, Subpart Db - *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units* due to a heat input capacity greater than 100 million Btu per hour. A copy of Subpart Db is provided in Appendix A.
4. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.43b, particulate matter emissions from the wood-waste boiler (SN-01) shall not exceed 0.10 lb/MMBtu heat input. This standard shall apply at all times, except during periods of startup, shutdown, or malfunction. Compliance with this condition shall be demonstrated by compliance with Specific Condition #7.
5. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.43b, the permittee shall not cause to be discharged to the atmosphere from SN-01, gases which exhibit opacity greater than 20% (6-minute average) except for one 6 minute period per hour of not more than 27%. This standard shall apply at all times, except during periods of startup, shutdown, or malfunction. Compliance with this condition shall be demonstrated by compliance with Specific Condition #8.

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6. Pursuant to §19.405(B) of 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 following emission rates at SN-01 as determined by the testing required by Specific Condition #7.

<b>Pollutant</b>	<b>Emission Limit (lb/MMBtu)</b>
CO	0.21
NOx	0.21

7. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52 Subpart E, the permittee shall conduct a stack emissions test on the wood waste-fired boiler stack (SN-01) to measure the following pollutants by the indicated EPA test method as listed in 40 CFR Part 60, Appendix A.

<b>Pollutant</b>	<b>EPA Test Method</b>
PM	5
CO	10
VOC	25A
NOx	7E
Exhaust Gas Volumetric Flow Rate	2

The facility shall conduct the initial performance test on the modified boiler within 90 days of permit issuance, and again within one year of the initial test. Once the facility has demonstrated compliance through two successive annual tests (at least 11 months apart), then the facility will be required to test once every 5 years starting from the date of the second successful test. If at any time the facility fails one of the 5-year tests, or the facility conducts additional modifications to the boiler, then the facility must again demonstrate compliance through 2 successive annual tests prior to reverting to the 5-year testing schedule.

All tests shall be conducted with this system operating at 90% or greater of capacity on biomass fuel. The ADEQ Air Division Compliance Inspector Supervisor shall be notified at least 15 days prior to the test. Results of the tests shall be sent to the address

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- indicated in General Provision #7.
8. Pursuant to Section 19.703 of Regulation 19, 40 CFR 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall comply with the opacity requirements of specific condition #5 by operating a continuously monitoring opacity meter for the exit gases from SN-01, meeting the standards established in the State of Arkansas "*Continuous Emission Monitoring Systems Conditions*" (Appendix B).
  9. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.49b, the permittee shall maintain records of the amount of wood fuel combusted during each day.
  10. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.49b, the permittee shall submit excess emission reports for any excess emissions, as defined by §60.49b(h)(3) and (4), which occurred during the reporting period.
  11. Pursuant to §19.405(B) of Regulation 19, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the 24-hour average steam production at the boiler (SN-01) shall not exceed an average of **3.72 million pounds of steam per calendar day. Compliance with this condition shall be demonstrated by performing a monthly calculation of steam production and averaging it over the number of days in that month.**
  12. Pursuant to §19.405(B) of Regulation 19, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 the permittee shall maintain records which demonstrate compliance with Specific Condition #11 and which may be used by the Department for enforcement purposes. These records shall indicate the average daily steam production for the preceding month. These records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual report of each individual month's steam production data shall be submitted in accordance with General Provision 7.

**SN-02, SN-03, SN-04, and SN-04A**

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Dry Kiln #1 through #4

**Source Description**

**The lumber received at the facility is transferred by a fork lift to one of the four dry kilns for steam drying. After the lumber is dried, it is placed in a cooling shed. From the cooling shed the lumber is planed and trimmed at the planer mill. The kilns are scheduled to be operated at 24 hours a day, 365 days per year, with the exception of the time required for loading, unloading, and maintenance.**

**Specific Conditions**

13. Pursuant to §19.501 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. Compliance with the emissions limits below shall be demonstrated by compliance with Specific Condition #14.

SN-#	Pollutant	Emission Rate lb/hr	Emission Rate tpy
02 03 04 04A	VOC "bubbled"	52.5	229.8

14. Pursuant to §19.405(B) of Regulation 19, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not dry more than 148,258 thousand board feet (MBF) of lumber for any consecutive twelve month period.
15. Pursuant to §19.405(B) of Regulation 19, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall maintain records of the amount of lumber dried which demonstrate compliance with the limit set in Specific Condition #14. These records shall be updated on a monthly basis, shall be kept on site, and shall be made available to Department personnel upon request. A rolling 12 month total and each individual month's data shall be submitted to the Department in accordance with General Provision 7.

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**SN-05, SN-06, and SN-11**

Truck Loading Bin Cyclone, Planer Mill Cyclone, and Woodshop Cyclone

**Source Description**

**After the lumber is dried, it is placed in a cooling shed. SN-05 represents emissions from the cyclone used in the Truck Loading Bin. From the cooling shed the lumber is planed and trimmed at the Planer Mill. The shavings and dust from the Planer Mill are sent to the Planer Mill cyclone (SN-06). The shavings and dust from the Woodshop are sent to the Woodshop cyclone (SN-11).**

**Specific Conditions**

16. Pursuant to §19.501 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. Compliance with the emissions limits below is established by compliance with Specific Condition #18.

SN-#	Pollutant	Emission Rate lb/hr	Emission Rate tpy
05	PM <sub>10</sub>	1.3	5.4
06	PM <sub>10</sub>	6.7	29.3
11	PM <sub>10</sub>	0.6	2.6

- 16 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. Compliance with this condition will be demonstrated by compliance with Specific Condition #18.

SN-#	Pollutant	Emission Rate lb/hr	Emission Rate tpy
05	PM	1.3	5.4
06	PM	6.7	29.3
11	PM	0.6	2.6



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17. Pursuant to §19.503 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not cause to be discharged to the atmosphere from SN-05, SN-06, and SN-11 gases which exhibit an opacity greater than 20%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.
  
18. Pursuant to §19.705 of Regulation #19 and 40 CFR 52, Subpart E, the permittee shall conduct daily observations of the opacity from SN-05, SN-06, and SN-11 and keep a record of these observations. If non-routine visible emissions are detected, then the permittee shall immediately take corrective action. If the non-routine visible emissions continue, the permittee may conduct a 6-minute opacity reading in accordance with EPA Reference Method #9 to verify compliance. This testing shall be performed by someone trained, but not necessarily certified in EPA Method 9. The results of these observations shall be kept on site and made available for inspection upon request. The permittee shall keep records of upset conditions which result in opacity readings at Cyclones SN-05, SN-06, and SN-11 greater than 20% for more than 30 minutes, including total elapsed time during which the opacity limit is exceeded.

**SN-05A and SN-12**

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Sawdust Bin Loadout and Woodshop Bin Loadout

**Source Description**

**Source SN-05A consists of fugitive emissions from the Sawdust Bin Loadout, with maximum loading rates of 120 ton/hr of sawdust and 40,000 tpy. The wood waste is dumped into trucks at an annual rate of 2,535 tons, and hauled offsite (SN-12), another source of fugitive emissions.** These two emission sources have been “bubbled” together for the purposes of this permit.

**Specific Conditions**

19. Pursuant to §19.501 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. Compliance with the emissions limits below is established by compliance with the throughput limitations of Specific Condition #22.

SN-#	Pollutant	Emission Rate lb/hr	Emission Rate tpy
05A and 12	PM <sub>10</sub>	0.1	0.1

20. 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. Compliance with this condition will be demonstrated by compliance with the throughput limitations of Specific Condition #22.

SN-#	Pollutant	Emission Rate lb/hr	Emission Rate tpy
05A and 12	PM	60.0	15.0

21. 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 exceed 60,000 tons of wood

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waste (sawdust and shavings) loadout at sources SN-05A and SN-12 in any consecutive twelve month period.

22. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain monthly records of the amount of loadout of woodwaste at sources SN-05A and SN-12 which may be used by the Department for enforcement purposes. These records shall be kept on site, and shall be made available to Department personnel upon request. A rolling 12 month total and each individual month's data shall be submitted to the Department in accordance with General Provision 7.

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**SN-14**

Staining Operations

**Source Description**

The staining is a process in which boards are fed into a paint booth that sprays and rolls the water based paint or stain on the lumber. The stain is a water-based product applied by dipping and wiping off excess material, and contains small amounts of propylene glycol, **which remains absorbed in the wood for long periods of time. Since it is not practical to determine the emission rate, it has been assumed that most of the glycol evaporates in the process.**

**Specific Conditions**

23. Pursuant to §19.501 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. Compliance with the emissions limits below is established by compliance with the limitations of Specific Conditions #24 and #25.

SN-#	Pollutant	lb/hr	tpy
14	VOC	2.2	4.2

24. 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 no more than 11,507 gallons of waterborne stain at SN-14 in any consecutive twelve month period.
25. Pursuant to 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 can substitute alternate staining media as long as VOCs from staining operations shall not emit more than 4.2 tons of VOCs in any consecutive twelve month period.

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26. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of VOC-containing raw materials used in the staining operations to demonstrate compliance with the limits set in specific conditions #24 and #25, and may be used by the Department for enforcement purposes. These records shall also indicate the VOC content of each staining media. The records shall be updated on a monthly basis, shall be kept on site, and shall be made available to Department personnel upon request. A rolling 12 month total and each individual month's data shall be submitted to the Department in accordance with General Provision 7.
  
27. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, no staining or painting materials used at the facility may contain any Hazardous Air Pollutants (HAPs) as listed in section 112(b)(1) of the Clean Air Act. The permittee shall maintain MSDS sheets for each stain and paint in order to demonstrate compliance with this condition. These MSDS sheets shall be kept on-site and shall be made available to Department personnel upon request.

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## **SECTION V: COMPLIANCE PLAN AND SCHEDULE**

Bean Lumber Co., Inc. is in compliance with the applicable regulations cited in the permit application. Bean Lumber Co., Inc. 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 §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203

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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.

2. 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 or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. 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, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein 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. 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. The permittee shall provide:
  - (1) Sampling ports adequate for applicable test methods
  - (2) Safe sampling platforms
  - (3) Safe access to sampling platforms
  - (4) Utilities for sampling and testing equipment
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 §19.303 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.
7. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, all monthly records required by this permit shall be updated by the 15<sup>th</sup> day of the month following the month to which the records pertain.

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8. 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.

#### **SECTION VII: INSIGNIFICANT ACTIVITIES**

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated June 27, 2001.



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DESCRIPTION	CATEGORY
Four (4) oil storage tanks - capacities range from 1,000 to 8,000 gallons or less	A-3
One (1) 4,000 gallon tank with no emissions	A-13
One (1) 7,000 gallon tank with no emissions	A-13
Two (2) 20,000 gallon CCA tanks	A-13
One (1) treating cylinder	A-13
One (1) 95,004 gallon recycling tank for CCA solution	A-13
1 - 8,000 gallon diesel fuel tank (Formerly SN-08)	A-13
1 - 8,000 gallon gasoline tank (Formerly SN-09)	A-13
1 - dual compartment fuel tank with 1 10,000 gallon compartment and one 4,000 gallon compartment (Formerly SN-10)	A-13

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, 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.

**SECTION VII: 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 Pollution Control and Ecology  
Air Division  
ATTN: Air Enforcement  
Post Office Box 8913  
Little Rock, AR 72219

8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.701(C)(3)(b) 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:
  1. The facility name and location,
  2. The process unit or emission source which is deviating from the permit limit,
  3. The permit limit, including the identification of pollutants, from which deviation occurs,
  4. The date and time the deviation started,
  5. The duration of the deviation,
  6. The average emissions during the deviation,
  7. The probable cause of such deviations,
  8. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and

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9. The name of the person submitting the report.

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

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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.
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.

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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;
  - 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;

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- 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 only those pollutant emitting activities addressed within.

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# INVOICE REQUEST FORM

PDS-

Date April 4, 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

CSN 55-0017

Facility Name Bean Lumber Company, Inc.

Invoice Mailing Address P.O. Box 590

Glenwood, Arkansas 71943-0590

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

Permit Number 189-AOP-R3

Permit Description Title 5

Permit Fee Code A

Amount Due \$ 2,534.00



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**Engineer**     **David Triplett**

**Paid?** No   Yes **Check #**

**Comments: Air Permit Fee Calculation**

Public Notice

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

**Bean Lumber Company, Inc., (CSN: 55-0017), owns and operates a lumber sawmill located on Highway 8 North in Glenwood, Arkansas. This permit modification is being issued in order to allow for the expansion of the capacity of the wood-waste boiler located on-site (SN-01). The capacity of the Wellons Boiler will increase from 125,000 pounds per hour of steam generation to 155,000 pounds per hour. Additionally, a new curve saw will be installed in the saw mill. This saw is constructed in such a manner that all sawdust generated is captured within the cutting machine. The captured sawdust is then transferred to the sawdust loadout area (SN-05A and SN-12) or to the boiler (SN-01) for use as fuel. Particulate emissions from the boiler have been re-calculated using the 0.1 lb/MMBtu New Source Performance Standard (NSPS) limit found in 40 CFR Part 60 Subpart Db. Previous particulate limits for the source had been calculated based on test data from the facility.**

**Due to the increase in capacity at the boiler, permitted emissions from this source will increase by 104.8 tons per year (tpy) of particulate matter (PM), 94.6 tpy of particulate matter smaller than 10 microns (PM<sub>10</sub>), 1.7 tpy of SO<sub>2</sub>, 0.7 tpy of VOC, 6.7 tpy of CO, and 25.2 tpy of NO<sub>x</sub>. This facility will continue to be classified as a minor source with respect to Prevention of Significant Deterioration (PSD) regulations at this time.**

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 Suzanne Carswell, Information Officer. Citizens desiring technical information concerning the application or permit should contact David Triplett, Engineer. Both Suzanne Carswell and David Triplett can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Clark County Library, 609 Caddo, Arkadelphia, Arkansas 71923. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal to the Department at the above address - Attention: Suzanne Carswell. 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 Commission's Administrative Procedures (Regulation #8) and Regulation #26.

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Dated this

Richard A. Weiss  
Interim Director

## **APPENDIX A:**

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**APPENDIX B:**