

ADEQ OPERATING AIR PERMIT

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

Permit No. : 189-AOP-R4

Renewal #1

IS ISSUED TO:

Bean Lumber Company

229 South Spur 8

Glenwood, AR 71943

Pike County

AFIN: 55-00017

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:

AND

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date

Bean Lumber Company
Permit #: 189-AOP-R4
AFIN: 55-00017

Table of Contents

SECTION I: FACILITY INFORMATION	4
SECTION II: INTRODUCTION	5
Summary of Permit Activity	5
Process Description	5
Regulations	7
Emission Summary	8
SECTION III: PERMIT HISTORY	11
SECTION IV: SPECIFIC CONDITIONS	13
SN-	13
SN-	17
SECTION V: COMPLIANCE PLAN AND SCHEDULE	24
SECTION VI: PLANTWIDE CONDITIONS	25
SECTION VII: INSIGNIFICANT ACTIVITIES	26
SECTION VIII: GENERAL PROVISIONS	27
Appendix A	
Appendix B	

Bean Lumber Company
Permit #: 189-AOP-R4
AFIN: 55-00017

List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM10	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Bean Lumber Company
Permit #: 189-AOP-R4
AFIN: 55-00017

SECTION I: FACILITY INFORMATION

PERMITTEE: Bean Lumber Company

AFIN: 55-00017

PERMIT NUMBER: 189-AOP-R4

FACILITY ADDRESS: 229 South Spur 8
Glenwood, AR 71943

MAILING ADDRESS P.O. Box 590
Glenwood, Arkansas 71943

COUNTY: Pike

CONTACT POSITION: Debbie Reed

TELEPHONE NUMBER: (870) 356-4165

REVIEWING ENGINEER: David Triplett

UTM North South (Y): Zone 15: 3799.4

UTM East West (X): Zone 15: 448.0

SECTION II: INTRODUCTION

Summary of Permit Activity

Bean Lumber Company, Inc. owns and operates a lumber sawmill and treating plant located in Glenwood, Pike County, Arkansas. This will be the fourth modification and the first renewal of the Title V Operating Air Permit for this facility. Changes to the facility permitted with this modification include an increase in the allowable lumber drying throughput from 148,258,000 board feet per year to 185,000,000 board feet per year, and a change in the lumber treatment chemicals from CCA to Copper Azole. There have also been changes to emission factors used to permit the wood-waste boiler (SN-01) and the drying kilns (SN-02 through SN-04A). As a result of the increase in dried lumber throughput, this facility is now classified as a major source with respect to federal Prevention of Significant Deterioration (PSD) regulations. The changes with this modification result in the following emission increases: 18.9 tons per year (tpy) of SO₂, 99.9 tpy of VOC, 24.51 tpy methanol, 3.51 tpy benzene, 5.71 tpy formaldehyde, 3.42 tpy acetone, as well as small increases in various other hazardous air pollutants (HAPs).

Process Description

Logs are received at the facility and are placed on the saw racks, where they are cut to the most desirable lengths. The logs are then processed through the debarker. The bark and smaller chips are removed and conveyed to a hog where they are ground and fed into the boiler (SN-01) as fuel.

The debarked logs move through the sawmill to be cut to the optimum size which realizes the best yield for each log. The wood that is undesirable for boards is sent to the chipping machine to be converted to chips. After the logs are cut into boards, the boards are mechanically sorted by dimension and stacked.

The lumber is then 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 steam-heated drying kilns (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 on to the truck loading 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 into predetermined amounts, bundled, and stored ready for shipping by truck or by rail.

Wood-Fired Boiler:

Steam required for the facility is generated by a Wellons boiler (SN-01) which is rated at 155,000 pounds per hour steam generation capacity and is nominally rated at 9,300 KW electrical power generation 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

Bean Lumber Company
Permit #: 189-AOP-R4
AFIN: 55-00017

no manual raking. The boiler is equipped with an electrostatic precipitator (ESP) to reduce exhaust particulate emissions, and a continuous opacity monitor.

The following activities are operated under the business name of Curt Bean Lumber Company, 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:

As of January 1, 2004, the lumber treatment process at the facility has been modified from a Chromated-Copper-Arsenate (CCA) treatment process, to a new copper azole process. This new formula does not contain any arsenic or chromium. The lumber is tagged, treated, placed on a drip pad to allow the necessary time to drain, and then moved to open storage ready for shipping. Emissions from this process are insignificant.

Staining or Painting:

The staining or painting is a process in which coatings are applied in a spray booth that applies water-based stain or paint to the lumber. VOC emissions from this source are permitted as SN-14.

NSR Status

With this modification (189-AOP-R4) the facility is designated as a major source with respect to NSR/PSD regulations due to permitted VOC emissions of greater than 250 tpy. NSR review may be necessary for any subsequent modifications at this facility which involve "significant" emission increases.

Bean Lumber Company
Permit #: 189-AOP-R4
AFIN: 55-00017

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
The boiler (SN-01) is subject to 40 CFR Part 60 Subpart Db – <i>Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units</i>

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	95.2	165.6
		PM ₁₀	32.7	139.7
		SO ₂	6.7	28.3
		VOC	205.0	337.8
		CO	55.8	237.7
		NO _x	55.8	237.7
HAPs		Benzene*	1.12	4.75
		Formaldehyde*	2.27	6.74
		Phenol*	0.02	0.06
		Methanol*	15.18	24.51
		Acetaldehyde*	2.24	3.61
		Chromium VI	9.30 E-4	0.01
		Chlorine	0.23	0.98
		Cobalt	0.01	0.01
		Arsenic	0.01	0.03
		Cadmium	0.01	0.01
		Lead Compounds	0.01	0.04
		2,3,7,8-Tetrachlorodibenzo-p-dioxin	2.28 E-9	9.73 E-9
POM	0.02	0.05		
Air Contaminants		Manganese	0.42	1.81
		Acetone	2.12	3.42
SN-01	Wellons Wood-Waste Boiler	PM	26.6	113.3
		PM ₁₀	24.0	102.3
		SO ₂	6.7	28.3
		VOC	2.3	9.8
		CO	55.8	237.7
		NO _x	55.8	237.7
		Benzene*	1.12	4.75
		Formaldehyde*	1.17	4.98

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		Phenol*	0.02	0.06
		Chromium VI	<0.01	<0.01
		Chlorine	0.23	0.98
		Cobalt	0.01	0.01
		Arsenic	0.01	0.03
		Cadmium	0.01	0.01
		Lead Compounds	0.01	0.04
		Manganese	0.42	1.81
		2,3,7,8-Tetrachlorodibenzo-p-dioxin	<0.01	<0.01
		POM***	0.02	0.05
02	Dry Kiln #1	VOC	45.5	N/A
		Methanol	3.45	
		Formaldehyde	0.25	
		Acetaldehyde	0.51	
		Acetone	0.48	
03	Dry Kiln #2	VOC	45.5	N/A
		Methanol	3.45	
		Formaldehyde	0.25	
		Acetaldehyde	0.51	
		Acetone	0.48	
04	Dry Kiln #3	VOC	49.3	N/A
		Methanol	3.73	
		Formaldehyde	0.27	
		Acetaldehyde	0.55	
		Acetone	0.52	
04A	Dry Kiln #4	VOC	60.2	N/A
		Methanol	4.55	
		Formaldehyde	0.33	
		Acetaldehyde	0.67	
		Acetone	0.64	
02 03 04 04A	Combined Annual Emissions – All Kilns	VOC	(see individual kiln limits above)	323.8
		Methanol		24.51
		Formaldehyde		1.76
		Acetaldehyde		3.61
		Acetone		3.42
05	Truck Loading Bin Cyclone	PM	1.3	5.4
		PM ₁₀	1.3	5.4

Bean Lumber Company
 Permit #: 189-AOP-R4
 AFIN: 55-00017

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
05A and 12	Sawdust Bin Loadout	PM PM ₁₀	60.0 0.1	15.0 0.1
06	Planer Mill Cyclone	PM PM ₁₀	6.7 6.7	29.3 29.3
11	Woodshop Cyclone	PM PM ₁₀	0.6 0.6	2.6 2.6
14	Staining Operations	VOC Ethylene Glycol*	2.2 0.3	4.2 0.6

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

*** 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.

Permit No. 189-AR-1, was issued to the facility in March of 1997, to incorporate 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.

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. PM₁₀ 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 to 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

Bean Lumber Company
Permit #: 189-AOP-R4
AFIN: 55-00017

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 PM10, 8.0 tpy of SO₂, 280.5 tpy of VOC, 231.0 tpy of CO, and 212.5 tpy of NO_x.

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 PM₁₀, 84.1 tpy PM, 0.3 tpy SO₂, 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.

Permit No. 189-AOP-R3 was issued to Bean Lumber Company on October 10, 2001. This modification was issued in order to allow for an expansion of the capacity of the Wellons wood-waste boiler. The capacity of the boiler was increased from 125,000 lb/hr of steam to 155,000 lb/hr steam. Additionally, a new curve saw was installed in the saw mill at this time. PM emissions from the boiler were recalculated based on the revised 0.1 lb/MMBtu NSPS limit found in 40 CFR Part 60 Subpart Db. Due to these changes, as well as changes to other published emission factors, emissions from the facility increased with this modification by: 104.8 tpy PM, 94.6 tpy PM₁₀, 1.7 tpy SO₂, 0.7 tpy VOC, 6.7 tpy CO, and 25.2 tpy NO_x.

SECTION IV: SPECIFIC CONDITIONS

SN-01

Source Name

Wellons Wood-Waste Boiler

Source Description

Steam required for the facility is generated by a Wellons wood-fired boiler (SN-01) which is rated at 155,000 pounds per hour steam generation capacity and is nominally rated at 9,300 KW electrical power generation 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 (ESP) to reduce exhaust particulate emissions, and a continuous opacity monitor.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #4, 8, 9, and 12. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	24.0	102.3
SO ₂	6.7	28.3
VOC	2.3	9.8
CO	55.8	237.7
NO _x	55.8	237.7

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #4, 8, 9, and 12. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	26.6	113.3
Benzene	1.12	4.75

Formaldehyde	1.17	4.98
Phenol	0.02	0.06
Chromium VI	<0.01	<0.01
Chlorine	0.23	0.98
Cobalt	0.01	0.01
Arsenic	0.01	0.03
Cadmium	0.01	0.01
Lead Compounds	0.01	0.04
Manganese	0.42	1.81
2,3,7,8-Tetrachlorodibenzo-p-dioxin	<0.01	<0.01
POM	0.02	0.05

3. 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, and malfunction. [§19.304 of Regulation 19 and 40 CFR §60.43b]
4. The permittee shall comply with the opacity limitations of Specific Condition #3 by operating a continuous opacity monitoring (COM) system in the SN-01 exhaust stack. This system shall be operated in accordance with the ADEQ “*Continuous Emission Monitoring Systems Conditions*” (Appendix B). [§19.304 of Regulation 19 and 40 CFR §60.48b(a)]
5. The Wellons wood-waste boiler is subject to and shall comply with 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*. A copy of Subpart Db is provided in Appendix A. [§19.304 of Regulation 19 and 40 CFR §60.40b]
6. Particulate matter emissions from the Wellons 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 Conditions #4 and #8. [§19.304 of Regulation 19 and 40 CFR §60.43b]

7. The permittee shall not exceed the following emission rates at SN-01 as determined by the testing required by Specific Condition #8. [§19.405(B) of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	Emission Limit (lb/MMBtu)
CO	0.21
NO _x	0.21

8. The permittee shall conduct stack emissions testing on the Wellons wood-waste boiler (SN-01) to measure the following pollutants by the indicated US EPA Reference Test Method as published in 40 CFR Part 60 Appendix A. [§19.702 of Regulation 19 and 40 CFR Part 52 Subpart E]

Pollutant	EPA Test Method
PM	5 w/back half sampling train particulate
CO	10
VOC	25A
NO _x	7E
Exhaust Gas Volumetric Flow Rate	2

The facility shall perform this testing every 5 years from the date of the last 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 conduct two successive annual tests. If both of these annual tests are successful, then the facility may return to the five-year testing schedule.

All tests shall be conducted with the boiler 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 testing. Results of all testing shall be submitted to the address indicated in General Provision #7.

9. The permittee shall maintain records of the amount of wood fuel combusted during each day. [§19.304 of Regulation 19 and 40 CFR §60.49b]
10. 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. [§19.304 of Regulation 19 and 40 CFR §60.49b]
11. 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. [§19.405(B) of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

12. 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 previous month. These shall be updated on a monthly basis, shall be maintained on-site, and shall be provided to Department personnel upon request. An annual report of each individual month's daily average steam production rate shall be submitted to the Department in accordance with General Provision #7.

CAM Requirements

13. The Wellons wood-fired boiler (SN-01) is subject to Compliance Assurance Monitoring and shall comply with all applicable provisions, including but not limited to: [Regulation No. 19§19.703, 40 CFR Part 52 Subpart E, and Part §64.6]
 - a. The permittee shall maintain a COM at a location such that its readings are representative of the stack exhaust opacity. [40 CFR Part §64.6(c)(1)]
 - b. The permittee shall maintain the indicator range on the COM to make readings of opacities between 0% and 20%. [40 CFR Part §64.6(c)(1)]
 - c. The permittee shall maintain a data acquisition system that completes a minimum of one cycle of opacity sampling and analyzing for each successive 10 second period. The data shall be used to determine six-minute average opacity readings from the COM. An alarm (visible and/or audible) shall be triggered when a six minute reading is over 20%. If more than one six minute reading exceeds the opacity limit in a one hour period the permittee shall take immediate corrective action. Records of any one hour period requiring corrective action shall be kept onsite, updated daily, and made available to Department personnel upon request. [Regulation No. 19§ 19.703, 40 CFR Part 52 Subpart E, and 40 CFR Part §64.6(c)(1)]
 - d. Readings shall not be recorded during "rake-out" periods. The "rake-out" period shall be noted on the operator's log and shall not be used to monitor compliance. [Regulation No. 19§ 19.703, 40 CFR Part 52 Subpart E, and 40 CFR Part §64.6(c)(3)]
14. The boiler rake-out period is to be scheduled for the same specific time each day and shall be recorded. The Department shall be notified in advance and in writing of the schedule or any changes. The process of soot blowing, grate cleaning, ash raking, and refiring or any part thereof is considered one activity, and the time limit on this activity is 45 minutes. This activity shall not be performed more than once in any consecutive 8 hour period, and it shall not be performed more than three times in any consecutive 24 hour period. [Regulation No. 18 §18.501(A)(4)]

SN-02, SN-03, SN-04, SN-04A

Source Name

Dry Kiln #1 through Dry Kiln #4

Source Description

The lumber received by the facility is transferred to one of four dry kilns for steam drying. After the lumber is dried, it is placed into a cooling shed. From the cooling shed the lumber is planed and trimmed at the planer mill.

Specific Conditions

15. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #17 and 18. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Source No.	Pollutant	lb/hr	tpy
02	VOC	45.5	N/A
03	VOC	45.5	N/A
04	VOC	49.3	N/A
04A	VOC	60.2	N/A
Combined Annual Limit	VOC	(See individual kiln limits above)	323.8*

* Total Limit for all four kilns combined

16. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #17 and 18. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Source	Pollutant	lb/hr	Tpy
02	Methanol	3.44	N/A
	Formaldehyde	0.25	
	Acetaldehyde	0.51	
	Acetone	0.48	
03	Methanol	3.44	N/A
	Formaldehyde	0.25	
	Acetaldehyde	0.51	
	Acetone	0.48	

Bean Lumber Company
 Permit #: 189-AOP-R4
 AFIN: 55-00017

04	Methanol	3.73	N/A
	Formaldehyde	0.27	
	Acetaldehyde	0.55	
	Acetone	0.52	
04A	Methanol	4.55	N/A
	Formaldehyde	0.33	
	Acetaldehyde	0.67	
	Acetone	0.64	
Combined Annual Limits for All Kilns	Methanol	(See individual kiln limits above)	24.51
	Formaldehyde		1.76
	Acetaldehyde		3.61
	Acetone		3.42

17. The permittee shall not process more than a total 185,000,000 board feet of lumber through the drying kilns during any consecutive 12-month period. [§19.705 of Regulation 19 and 40 CFR Part 52 Subpart E]
18. The permittee shall maintain monthly records of the amount of lumber dried in the dry kilns. These records shall be updated on a monthly basis, shall be maintained 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. [19.705 of Regulation 19 and 40 CFR Part 52 Subpart E]

SN-05, SN-06, SN-11

Source Name

Truck Loading Bin Cyclone, Planer Mill Cyclone, 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 in 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

19. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #21 and 22. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Source	Pollutant	lb/hr	tpy
SN-05	PM ₁₀	1.3	5.4
SN-06	PM ₁₀	6.7	29.3
SN-11	PM ₁₀	0.6	2.6

20. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #21 and 22. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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

21. The permittee shall cause to be discharged to the atmosphere from SN-05, SN-06, and/or SN-11 any gases which exhibit an opacity greater than 20% as measured by US EPA Reference Method 9. [§19.503 of Regulation 19 and 40 CFR Part 52 Subpart E]

Bean Lumber Company

Permit #: 189-AOP-R4

AFIN: 55-00017

22. The permittee shall conduct daily observation of the opacity from SN-05, SN-06, and SN-11 and keep records of these observations. If visible emissions are observed which appear to be in violation of Specific Condition #19, then the permittee shall immediately take corrective action. [§19.503 of Regulation 19 and 40 CFR Part 52 Subpart E]

SN-05A and SN-12

Source Name

Sawdust Bin Loadout and Woodshop Bin Loadout

Source Description

SN-05A consists of non-point emissions from the sawdust bin loadout. The woodshop waste is dumped into trucks (SN-12) and hauled offsite, another source of non-point emissions. These two emission sources have been “bubbled” together in this permit.

Specific Conditions

23. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #25 and 26. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Source	Pollutant	lb/hr	Tpy
SN-05A and 12	PM ₁₀	0.1	0.1

24. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #25 and 26. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Source	Pollutant	lb/hr	Tpy
SN-05A and 12	PM	60.0	15.0

25. The permittee shall not exceed 60,000 tons of wood waste (sawdust and shavings) loadout at sources SN-05A and SN-12 during any consecutive 12-month period. [§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]
26. The permittee shall maintain monthly records of the amount of wood waste processed through SN-05A and SN-12. A twelve month rolling total and each individual month’s data shall be maintained on-site and shall be made available to Department personnel upon request. These records shall be submitted to the Department in accordance with General Provision #7. [§19.705 of Regulation 19 and 40 CFR Part 52 Subpart E]

SN-14

Source Name

Staining Operations

Source Description

The staining is a process 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. The stain contains small amounts of ethylene glycol.

Specific Conditions

27. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #29 and 31. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Source	Pollutant	lb/hr	Tpy
14	VOC	2.2	4.2

28. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #29 and 32. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Source	Pollutant	lb/hr	Tpy
14	Ethylene Glycol	0.30	0.58

29. The permittee shall not use more than 11,500 gallons of stain at this source (SN-14) during any consecutive 12-month period. [§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]
30. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #29. These records shall indicate the amount of stain used during each month, as well as a rolling 12-month total of stain usage. These records shall be maintained on-site and shall be made available to Department personnel upon request. These records shall be submitted to the Department in accordance with General Provision #7. [§19.705 of Regulation 19 and 40 CFR Part 52 Subpart E]

Bean Lumber Company
Permit #: 189-AOP-R4
AFIN: 55-00017

31. The permittee shall not use any stain which exceeds a VOC content of 0.73 lb/gal. MSDS or other records shall be maintained on-site in order to demonstrate the VOC content of the stains in use at the facility. [§19.705 of Regulation 19 and 40 CFR Part 52 Subpart E]

32. The permittee shall not use any stain which contains ethylene glycol in excess of 0.10 lb/gal. MSDS or other records shall be maintained on-site in order to demonstrate the ethylene glycol content of the stains in use at the facility. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Bean Lumber Company
Permit #: 189-AOP-R4
AFIN: 55-00017

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Bean Lumber Company 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. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment.
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee must prepare and implement a Startup, Shutdown, and Malfunction Plan (SSM). If the Department requests a review of the SSM, the permittee will make the SSM available for review. The permittee must keep a copy of the SSM at the source's location and retain all previous versions of the SSM plan for five years. [Regulation 19, §19.304 and 40 CFR 63.6(e)(3)]

SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated December 18, 2003.

Description	Category
Four (4) oil storage tanks. Capacities are 1,000, 1,000, 2,000, and 8,000 gallons	A-3
One (1) 8,000 gal. diesel fuel tank (former SN-08)	A-13
One (1) 8,000 gal. gasoline tank (former SN-09)	A-13
One (1) dual-compartment fuel tank with one 10,000 gal. compartment and one 4,000 gal. compartment	A-13
Treating Plant Bulk Tanks, storing Wolman E Copper Azole, 5 tanks total, 4,000, 7,000, 20,000, 20,000, and 95,004 gal.	A-13
Treating Plant Treating Cylinder	A-13
One (1) 4,000 gal. tank storing no VOC or HAP	A-13
One (1) 7,000 gal. tank storing no VOC or HAP	A-13
Chip Bin	A-13
Marley Cooling Tower	A-13

SECTION VIII: GENERAL PROVISIONS

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. [40 CFR 70.6(b)(2)]
2. 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. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will 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. [Regulation 26, §26.406]
4. 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, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing 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.
6. The permittee must retain the records of all required monitoring data and support information for at least five (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. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

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

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location
 - ii. The process unit or emission source deviating from the permit limit,
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs,
 - iv. The date and time the deviation started,
 - v. The duration of the deviation,
 - vi. The average emissions during the deviation,
 - vii. The probable cause of such deviations,
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee 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 the report will serve as both the initial report and full report.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will 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. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. 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, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
11. 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 to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]
14. The permittee must 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 must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director

- along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
 16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
 17. If the permit allows 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 operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
 18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
 19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
 20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
 - 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 required 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 assuring compliance with this permit or applicable requirements.
 21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department.

Bean Lumber Company
Permit #: 189-AOP-R4
AFIN: 55-00017

All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]

- 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;
 - e. and Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)] The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section; the liability of the permittee 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 §408(a) of the Act or, the ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]