

ADEQ MINOR SOURCE AIR PERMIT


Permit No. : 0684-AR-4

IS ISSUED TO:

Fiber Resources, Inc.
1609 Celia Road
Pine Bluff, AR 71611
Jefferson County
AFIN: 35-00187

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

Signed:


Mike Bates
Chief, Air Division

Date

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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
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: Fiber Resources, Inc.

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PERMIT NUMBER: 0684-AR-4

FACILITY ADDRESS: 1609 Celia Road
Pine Bluff, AR 71611

MAILING ADDRESS: P.O. Box 8727
Pine Bluff, AR 71611

COUNTY: Jefferson County

CONTACT NAME: W.R. Weaver

CONTACT POSITION: President

TELEPHONE NUMBER: 870-535-1759

REVIEWING ENGINEER: Ambrosia Brown

UTM North South (Y): Zone 15: 3787202.19 m

UTM East West (X): Zone 15: 601733.15 m

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Section II: INTRODUCTION

Summary of Permit Activity

Fiber Resources, Inc., located at 1609 Celia Road, Pine Bluff, AR 71611, is a wood and paper recycling facility. This facility has submitted an application to allow the processing of wood chips to produce dry fiber. This process includes eight new sources consisting of conveyors, shredders, dryers, bins, and a Webb Burner. The resulting increases of emissions are 35.9 tpy PM, 25.9 tpy PM₁₀, 1.2 tpy SO₂, 1.0 tpy VOC, 28.8 tpy CO, 23.6 tpy NO_x, 0.22 tpy Formaldehyde, and 0.2 tpy Acrolein.

Process Description

Waste Wood Receiving and Storage

Dry wood waste is purchased from selected lumber processing facilities within the State of Arkansas. The wood waste has the following characteristics: 1) total moisture content less than 12%; 2) classified and separated as to hardwood (oak) and softwood (pine); 3) particle size ranges from saw kerf and shavings to 2" chips; 4) no contaminants (100% wood).

The dry wood waste is delivered to the facility in enclosed, self-unloading trailers. The wood waste is unloaded into any one of three storage sheds. These sheds are fully enclosed except for one side which is open for access. Woodwaste Receiving/Unloading (SN-01) generates particulate emissions by the unloading of woodwaste from the trucks, stacking of woodwaste in the sheds by a front end loader, and loading of woodwaste into the metering hoppers at each of the pelletizing lines.

The delivery trucks are scheduled to arrive during daylight hours, Monday through Friday. Fiber Resources purchases up to ten truck loads of this material per day.

Wood Pelletizing Process

A front end loader is used to retrieve the dry wood waste from one of the storage sheds. The loader then deposits the wood waste into the process receiving and metering hopper. The receiving and metering hopper is enclosed on all but one side to allow access. No air controls are utilized at this point.

The wood material is contained within sealed conveyors and process equipment once it is into the metering hopper. The pellet operation utilizes air control equipment, a high efficiency cyclone in line with an air filtering baghouse. The wood material is mechanically conveyed into a Hammer Mill. The wood is reduced to a consistent size. The Hammer Mill is vented into the air control system.

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The hammer milled wood material is mechanically conveyed to a surge bin above the Pellet Mill. The wood material is metered out of the surge bin and into the Pellet Mill. Low pressure steam, water, and vegetable oil can be added in small percentages as required to optimize the pelleting process. The equipment is feed pellet mill technology adapted for use in the wood pellet industry. In the pelletizing process, the wood material is subjected to extreme pressure. The temperature of the wood is also increased through frictional resistance to the pressure as the wood is extruded through the pellet mill. The wood pellets break off in random lengths and are discharged from the pellet mill.

The hot wood pellets are conveyed to a pellet cooler. The hot pellets are distributed into the cooler and accumulated to a controlled level. Ambient air is then drawn into and through the hot pellets to cool them. This air is a controlled air system consisting of a high-efficiency cyclone and baghouse filter. The facility has three pelletizing lines. Line #1 processes softwood (pine), while Lines #2 and #3 process hardwoods (oak). The pelletizing lines are grouped under SN-02 as Wood Pelletizing Operations.

The cooled pellets are then discharged from the cooler. The wood pellets are then screened. The acceptable pellets are conveyed to a bulk pellet storage bin. The fines are screened out of the pellets and returned back to the receiving and metering hopper in order to be reprocessed.

Packaging of Wood Pellets

The wood pellets are metered out of the bulk pellet storage bins. The pellets are then conveyed to a shaker screen. The acceptable pellets are then conveyed into a bagger bin. The fines from the shaker screen are mechanically returned to a dry storage shed and mixed back into the wood waste and reprocessed. The pellets in the bagger bin are weighed out in specific weights and deposited into poly bags which are heat sealed, stacked onto pallets, covered and stretch wrapped. The product is then stored or readied for shipment to a customer.

The shaker screen and bagging machinery is equipped with a dust collection system to ensure that the product is dust-free when packaged. The dust collection system is a bag house. The facility has two packaging lines. Line #1 processes softwood and Line #2 processes hardwood. The packaging lines are grouped under SN-03 as Wood Pellet Packaging Operations.

Paper Recycling Operations

Waste paper is hauled into the facility in self unloading container trucks. Fiber Resources only processes post industrial waste paper. The waste paper is dumped onto an outdoor concrete pad and sorted by grade of paper.

Material which is too large to bale as received is shredded into hand sized pieces. A portable Tub Grinder is utilized to shred this material. The Tub Grinders (SN-04 and SN-05) are Morbark Shredding Systems Model 1300. The facility has two such diesel units, 750 HP and 800 HP. The grinder functions as a hammer mill with a rotating tub above for the continuous

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feed of material. Paper is loaded into the tub. Clean water is sprayed into the hammer mill discharge of the Tub Grinder to reduce and control the paper fibers.

The shredded paper is then discharged from the Tub Grinder onto an elevated conveyor. The conveyor discharges the paper into a surge hopper above the baler. The baler compacts the material into dense bales, which are then stored for shipment.

Chip & Chunk Process

Green Wood hickory logs are purchased and delivered via truck. They are unloaded using a portable knuckle boom log loader, and stacked in a log yard on-site.

The logs are moved to the processing shed via loader. The hickory logs are then loaded onto an indexing table. The indexing table feeds and L&M radial arm chain saw (SN-06). The radial saw cuts the logs into 2" wafers. The wafers are conveyed and feed into "chunker" which breaks the wafers into irregular chunks of wood approximating a 2" cube (SN-07). The chunks are screened and conveyed into a drying trailer. The small ends of the logs which cannot be processed though the saw and "chunker" are moved to a vibrating conveyor which feeds a 48" chipper (SN-08) and screen combination. The chips are then conveyed to a second drying trailer. The sawdust produced from the chipper, the radial saw, and the "chunker" screen is collected and conveyed to a third drying trailer. The sawdust when it is dried will either be used for supplemental fuel to the burner or transported to Fiber Resources' pellet mill for production of other products. The total capacity though the green chip and chunk processing facility is anticipated to be 40,000 pounds per shift.

Drying

All of the green wood components from the green wood processing are collected in drying trailers (SN-09). The trailers are 8' x 16'. The trailers have an air plenum in the bottom. The product to be dried is on the top side of the plenum which is perforated. Hot air is blown into the plenum at approximately 250°F. The drying process will take between eight and twelve hours depending on the product. Sawdust will dry faster than chunks.

The hot air is produced using an 8 MMBTU/hr Webb Burner (SN-10). SN-10 is a sawdust fired burner. The fuel is a dry wood waste no larger than 0.125" in diameter. The dry wood waste is suspension fired in the combustion chamber. This burner can supply hot air for up to 12 trailers at a time.

Once the wood in the trailers has reached the desired moisture content of 15% or less, the trailer is moved to a hoist and dumped (SN-11) slowly into a pit conveyor which conveys the wood product to a packaging line. The chip product is packaged into 2 pound or 170 cubic inch bags. The chunk product is packaged in bags ranging from 6 pounds to 25 pounds. These products are stacked onto pallets and shipped to customers (SN-12).

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Railroad Ties Process

Green hickory logs are received in the wood receiving area at a rate of 50 tons per hour and will operate for 2,000 hours per year. This area is equipped to process 100,000 tons of logs per year. The logs are conveyed from the receiving area to the debarker (SN-13), which removes the bark in an enclosed unit with a "Nicholson" ring module that is driven by a belt drive. The bark is then sent to the "bark pile," (SN-20) which is loaded (SN-21) and used for boiler fuel at the Evergreen Packaging Mill.

Debarked logs are conveyed to the radial saw (SN-14) that cuts the logs to length. Then they are conveyed to the circular saw (SN-15) that squares the logs. The 76" radial saw produces a wood chip approximately 1/4" X 1/4" X 1/8" in size and the 56" circular saws produce a wood chip approximately 1/2" in size. Approximately 95-98% of byproduct produced from the radial saw and circular saws is in the form of wood chips. The squared logs or cross cuts ties are trucked to another facility where they undergo further processing off site. This process may produce 36,318 tons of railroad ties per year.

Wood chips produced by sawing will be conveyed to the chipper, which consists of a small disk with knives (SN-16). The chipper reduces the green wood chips to 3/4" X 3/4" in size. The cyclone (SN-17) collects the wood chips and directs them to the radial stacker. The chips will then be distributed onto a semicircular concrete area via a radial stacker consisting of a rotating conveyor that distributes the material in a semicircular pattern. Approximately 55,682 tons of wood per year will be conveyed to the chip pile (SN-18) or loaded into outgoing trucks (SN-19) to be sold to the paper industry.

Fiber Resources Process

Green wood chips from the chip pile area are loaded (SN-22) onto the chip re-claimer where the wood chips will be screened and conveyed by size, ground by a 300 hp shredder to 3/4" X 3/16" (SN-23), and conveyed to rotary dryer. The cyclone dryer (SN-24) then propels the dry wood to the screw conveyor. The screw conveyor (SN-25) and propels the dry wood to the screw conveyor. The screw conveyor (SN-25) transports the pulverized chips to an elevator conveyor (SN-26) that loads them into the chip bin (SN-27) until they are transported to the Pellet Facility. From the wood chips that are processed, approximately 27,346 tons will be used to make wood pellets. Each year approximately 23,510 tons of water, contained within the green wood, will be lost through the drying process.

The finer material (SN-28) from the conveyors fuels the Webb Burner (SN-29) which is an integral part of the drying process. Complete combustion of the wood particulate occurs within the Webb Burner. Approximately 4,826 tons of dry wood material will be combusted in the Webb Burner per year. Total emissions are based upon an operational scenario of 4,000 hours per year.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009

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Total Allowable Emissions

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	110.9	152.8
PM ₁₀	61.7	98.4
SO ₂	2.9	10.8
VOC	2.1	3.9
CO	22.7	58.6
NO _x	28.6	91.3
Acetaldehyde	0.02	0.02
Acrolein	0.11	0.21
Formaldehyde	0.12	0.23
Methanol	0.06	0.06
Total HAP	0.31	0.52

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Section III: PERMIT HISTORY

- 684-A Issued May 28, 1982. Emissions were permitted at the following rates: 2 lb/hr from the Pulp Dryer cyclone (SN-01) and 1 lb/hr from the Pellet Cooler Cyclone (SN-02).
- 684-AR-1 Issued September 3, 2004. The facility modified their permit to update emission sources. Hourly and annual emissions were quantified for all sources. Process limits corresponding to emission estimates were added. Two new sources, Tub Grinders (SN-04 and SN-05) for paper recycling, were also added to the permit. Plantwide emissions were estimated to be 23.7 ton/yr PM, 23.4 ton/yr PM₁₀, 8.9 ton/yr SO₂, 1.5 ton/yr VOC, 14.8 ton/yr CO, and 55.4 ton/yr NO_x.
- 684-AR-2 Issued July 06, 2009. The facility modified their permit to add a Chip & Chunk Operation (SN-06 to SN-12). The resulting increase in permitted emissions were: 13.8 tpy PM, 13.8 tpy PM₁₀, 12.3 tpy NO_x, 0.7 tpy SO₂, 15.0 tpy CO, 1.4 tpy VOC, 0.06 tpy Methanol, 0.01 tpy Formaldehyde, 0.01 tpy Acrolein, and 0.02 tpy Acetaldehyde.
- 684-AR-3 Issued on October 26, 2009. The facility modified the permit to add a fiber resources process which contains sources SN-13 through SN-21. The addition to the facility will process green hickory logs to create various sized wood chips. The resulting increases of emissions are 36.3 tpy PM₁₀ and 78.4 tpy PM.

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Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 19, §19.501 et seq., and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Woodwaste Receiving/Loading	PM ₁₀	0.1	0.1
02	Wood Pelletizing Operations	PM ₁₀	4.3	18.5
03	Wood Pellet Packaging Operations	PM ₁₀	0.7	3.0
04	Tub Grinder, 800 HP Diesel	PM ₁₀	0.3	0.9
		SO ₂	1.1	4.6
		VOC	0.2	0.8
		CO	1.8	7.6
		NO _x	6.6	28.6
05	Tub Grinder, 750 HP Diesel	PM ₁₀	0.2	0.9
		SO ₂	1.0	4.3
		VOC	0.2	0.7
		CO	1.7	7.2
		NO _x	6.2	26.8
06	Sawing	PM ₁₀	0.6	0.6
07	Chunker	PM ₁₀	0.1	0.1
08	Chipper	PM ₁₀	0.4	0.4
09	Drying Trailer	PM ₁₀	2.4	2.5
		VOC	1.0	1.0

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SN	Description	Pollutant	lb/hr	tpy
10	Wood Fired Webb Burner (8 MMBtu/hr)	PM ₁₀	2.9	9.0
		SO ₂	0.2	0.7
		VOC	0.2	0.4
		CO	4.8	15.0
		NO _x	4.0	12.3
11	Pit Dump Bad & Ship	PM ₁₀	0.1	0.1
12	Bag & Ship	PM ₁₀	0.1	0.1
13	Debarking	PM ₁₀	0.6	0.6
14	76" Radial Saw	PM ₁₀	9.2	9.2
15	56" Circular Saw	PM ₁₀	9.2	9.2
16	Chipper	PM ₁₀	10.1	10.1
17	Cyclone (15,000 CFM)	PM ₁₀	6.8	6.8
18	Green Chip Storage	PM ₁₀	0.1	0.1
19	Green Chip Loading	PM ₁₀	0.1	0.1
20	Green Bark Storage	PM ₁₀	0.1	0.1
21	Green Bark Loading	PM ₁₀	0.1	0.1
22	Wood Chip Loading	PM ₁₀	0.1	0.1
23	Grinder/Pulverizer 300hp	PM ₁₀	2.8	5.6
24	Cyclone Dryer	PM ₁₀	0.8	1.6
25	Screw Conveyor	PM ₁₀	0.1	0.1
26	Elevator Conveyor	PM ₁₀	0.1	0.1
27	Wood Chip Loading	PM ₁₀	0.1	0.1
28	Burner Conveyor	PM ₁₀	0.5	0.9
29	Webb Burner	PM ₁₀	8.7	17.4
		SO ₂	0.6	1.2
		VOC	0.5	1.0
		CO	14.4	28.8
		NO _x	11.8	23.6

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2. The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Woodwaste Receiving/Loading	PM	1.1	0.4
02	Wood Pelletizing Operations	PM	4.3	18.5
03	Wood Pellet Packaging Operations	PM	0.7	3.0
04	Tub Grinder, 800 HP Diesel	PM	0.3	0.9
05	Tub Grinder, 750 HP Diesel	PM	0.2	0.9
06	Sawing	PM	0.9	1.0
07	Chunker	PM	0.1	0.1
08	Chipper	PM	0.9	1.0
09	Drying Trailer	PM	2.4	2.5
		Methanol	0.06	0.06
		Formaldehyde	0.01	0.01
		Acrolein	0.01	0.01
		Acetaldehyde	0.02	0.02
10	Wood Fired Webb Burner (8 MMBtu/hr)	PM	3.2	10.0
11	Pit Dump Bag & Ship	PM	0.1	0.1
12	Bag & Ship	PM	0.1	0.1
13	Debarking	PM	1.0	1.0
14	76" Radial Saw	PM	16.1	16.1
15	56" Circular Saw	PM	16.1	16.1
16	Chipper	PM	27.9	27.9
17	Cyclone (15,000 CFM)	PM	16.9	16.9

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SN	Description	Pollutant	lb/hr	tpy
18	Green Chip Storage	PM	0.1	0.1
19	Green Chip Loading	PM	0.1	0.1
20	Green Bark Storage	PM	0.1	0.1
21	Green Bark Loading	PM	0.1	0.1
22	Wood Chip Loading	PM	0.1	0.1
23	Grinder/Pulverizer (300hp)	PM	4.9	9.8
24	Cyclone Dryer	PM	2.0	4.0
25	Screw Conveyor	PM	0.1	0.1
26	Elevator Conveyor	PM	0.1	0.1
27	Wood Chip Loading	PM	0.1	0.1
28	Burner Conveyor	PM	1.3	2.5
29	Webb Burner	PM	9.6	19.2
		Acrolein	0.10	0.20
		Formaldehyde	0.11	0.22

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

SN	Limit	Regulatory Citation
01, 04, 05, 10, 19, 21, 22, 23, 27, 29	20%	§19.503 and A.C.A
02, 03, 06, 07, 08, 09, 11, 12, 13, 14, 15, 16, 17, 18, 20, 24, 25, 26, 28	5%	§18.501 and A.C.A.

4. 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

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pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. The permittee shall not process more than 87,000 tons of dry wood waste per rolling 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-01 Conditions

7. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #7. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-04 and SN-05 Conditions

8. The permittee may only combust diesel fuel at the Tub Grinders. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
9. The permittee may only combust diesel fuel with a maximum sulfur content limit, by weight, of 0.5%. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-06 through SN-12 Conditions

10. The permittee shall not process more than 5,200 tons of logs using the green wood chip and chunk line (SN-06 through SN-12) per consecutive 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
11. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition 11. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SN-13 through SN-29 Conditions

12. The permittee shall not process more than 100,000 tons of logs using the railroad tie/fiber resources line (SN-13 through SN-29) per consecutive 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition 13. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-22 through SN-29 Conditions

14. The permittee shall not operate the fiber resources process (SN-22 through SN-29) for more than 4,000 hours per consecutive 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
15. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition 14. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated September 28, 2009.

Description	Category
2.1 MMBTU/hr Boiler	A-1
Diesel Tank #1 (1000 gallons)	A-2
Diesel Tank #2 (1000 gallons)	A-2
Diesel Tank #3 (600 gallons)	A-3
Mobiltrans HD30 Tote	A-1
AW 46 Hydraulic Tote	A-1

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Section VI: GENERAL CONDITIONS

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

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor

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5301 Northshore Drive
North Little Rock, AR 72118-5317

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

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nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A. §8-1-105(c)]
19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
 - a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Regulation 18, §18.314(A), Regulation 19, §19.416(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facilities total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
 - a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;
 - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
 - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
 - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

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21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
 - a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to
Fiber Resources, Inc., P.O. Box 8727, Pine Bluff, AR, 71611, on this 22nd day of
February, 2010.

Pam Owen
Pam Owen, AAI, Air Division