

ADEQ OPERATING AIR PERMIT

Transfer of Permit is Effective June 30, 2002

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

Permit #: 688-AOP-R0

IS ISSUED TO:

Weyerhaeuser, Malvern MDF
Route 3, Gifford Community
Malvern, AR 72104
Hot Springs County
CSN: 30-0015

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

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE: Weyerhaeuser - Malvern MDF
CSN: 30-0015
PERMIT NUMBER: 688-AOP-R0

FACILITY ADDRESS: 1275 Willamette Road
Malvern, AR 72104

COUNTY: Hot Springs

CONTACT POSITION: Brian Coston
TELEPHONE NUMBER: (501) 337-9400

REVIEWING ENGINEER: Wesley Crouch

UTM North-South (Y): Zone 15: 3804.6
UTM East-West (X): Zone 15: 525.5

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SECTION II: INTRODUCTION

Willamette Industries, Inc. (CSN: 30-0015), operates a medium density fiberboard (MDF) manufacturing facility at Route 3, Gifford community, Malvern, Arkansas 72104. MDF is a composite panel product similar to particle board, but made up of a more refined wood fiber. This product is desirable for furniture manufacturing and other uses because of its machinability and surface characteristics.

Summary of Permit Activity

This modification represents revised emission rates at SN-26 to reflect stack test results, SN-01 has been replaced with a regenerative thermal oxidizer, emissions at SN-20 and SN-21 have been routed to the inlet of the Line 1 and Line 2 dryers and the emissions from SN-05 and SN-11 have been revised to reflect the new mode of operation. Also, the Line 2 press enclosure baghouse exhaust has been routed to the inlet of the Line 2 dryer and the Line 1 press enclosure baghouse exhaust has been routed to the inlet of the Line 1 dryer.

Process Description

Raw Material Storage: Two basic raw materials are used to manufacture MDF: wood residuals (from sawmills and plywood plants) and a binding resin. All wood raw material is brought to the facility by eighteen-wheel trucks. Wood (Southern Yellow Pine) in the form of green chips, plytrim, and dry planer shavings from nearby plywood plants and lumber mills are unloaded into a hopper and transported by conveyor belt to be stored at the raw material storage area. The dry planer shavings and plytrim are stored in the raw material storage building. The green chips, having a high moisture content and large particle size, are stored in an outside pile (SN-19). Resin is delivered to the plant by tanker truck and stored in six identical 10,000 gallon fixed roof storage tanks (SN-25) located within the milling and drying building.

Refining: The wood raw materials (in proportions of approximately 30% ($\pm 15\%$) green chips, 60% ($\pm 20\%$) dry planer shavings, and 10% ($\pm 5\%$) plytrim) are transferred from their respective storage areas into the storage metering silos. This is accomplished by use of a front-end loader transferring the wood raw material into a hopper and then onto a conveyor. The combined wood material is then moved from the storage metering silo to the refiner metering bin via a series of belts and screws. Following the refiner metering bin, the wood raw material feed is split between Line 1 and Line 2. At this point, the MDF production process is very similar between the two production lines.

Water, an urea scavenger (if needed), and a wax additive are introduced at the wetting and mixing screw following the split of the wood material flow between Line 1 and Line 2. The

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wood is transported, via screw conveyor to a digester. The digester adds moisture and heat to soften the wood for the refining process. The softened wood material then passes through pressurized steam refiners. The refiners machine the wood material into small, uniform fibers through centrifugal force and physical abrasion. Reject wood fiber from the refiners is pneumatically conveyed to the Refiner Reject Start-Up Vault Cyclone (SN-18) for recycle back to the process.

Drying: The wood fiber mixture from the refiners is injected with an urea-formaldehyde or melamine-urea formaldehyde resin binder and is pneumatically conveyed through a blowline to the infeed of the fiber dryer. The fiber mixture is dried in a pneumatic flash tube dryer using steam coils as a heat source. The exhaust from each flash tube dryer (at approximately 120EF to 150EF) is directed into dual high efficiency cyclones for primary particulate control. Particulate from Line 1 Dryer was previously controlled with three Rotating Bed Protectors (RBPs), but in accordance with a C.A.O., Willamette has replaced the existing cyclones with new cyclones, and the RBPs have been replaced with a regenerative thermal oxidizer. Particulate from Line 2 Dryer is controlled with a thermal oxidizer. The Line 1 flash tube dryer is controlled by the West Cyclone and the East Cyclone. The Line 2 flash tube dryer is controlled by the West Cyclone and the East Cyclone. The dried fiber from the line 1 cyclone is conveyed by negative air to the fiber metering bins ready for mat forming. A secondary (relay) dryer provides low temperature drying for the line 2 system during transport to the fiber metering bins.

In order to meet BACT control standards for the Line 2 Dryer Cyclone Vent PM and VOC emissions, Willamette has installed a thermal oxidizer equipped with a low NO_x burner on the Line 2 dryer cyclones. This modification resulted in a 96% decrease in VOC emissions and a 95% decrease in PM emissions exiting the Dryer Cyclone Vents.

Mat Forming: The metering bin deposits a mat of fiberized wood, resin, and wax mixture on a weighbelt to determine the density of the material. The fiberized mixture then continues by air conveyance system to the Doffin bin located at the production line. From the Doffin bin, a continuous mat of fiber is deposited on a moving forming wire. The forming operation is completed with vacuum fans which pull air from under the former, and scalpers that control the mat thickness. Particulate emissions from the Line 1 and Line 2 air conveyance systems are controlled by the L1 Weighed Fiber Cyclone and Pneumatic Fabric Filter (SN-04), and L2 Relay Dryer Cyclone and two Pneumatic Fabric Filters (SN-29), respectively. Line 1 uses the L1 Reject Cyclone and Former Vacuum plus a Pneumatic Fabric Filter (SN-22) for particulate emissions control while Line 2 uses the Mat Reject Cyclone plus a Pneumatic Fabric Filter (SN-27) and the Former Vacuum plus a Pneumatic Fabric Filter (SN-28) for particulate emissions control. The formed mat is transported on belt conveyors where it is prepressed (densified) and trimmed to rough dimensions prior to pressing operations. Mats which do not meet weight

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standards are rejected. The particulate emissions from the cleanup and shaveoff of Line 2 are controlled by a Pneumatic Fabric Filter (SN-09).

Pressing: The prepressed mats are loaded into the presses (L1 MDF Press and L2 MDF Press) from the belt conveyors. The hot presses use heat from steam and pressure to cure the resin. The Line 1 press has 13 openings and has a maximum capacity of pressing 10.8 thousand square feet (MSF) of MDF per hour (3/4" basis). The Line 2 press has 12 openings and has a maximum capacity of pressing 19.6 MSF per hour (3/4" basis). Both presses have been enclosed and exhaust to Pneumatic Fabric Filters (SN-20 and SN-21). With this modification, Willamette has routed the Line 1 and Line 2 press enclosure baghouse exhaust to the inlet of their respective dryer in order to achieve additional emission control.

Finishing: Following the L1 and L2 MDF presses, the rough MDF panels are conveyed to a staging area where the boards are cooled to prevent damage from heat buildup. The panels are then stacked and transferred to the finishing area. All rough panels are sanded before being sawed to finished panel dimensions. The plant sander has particulate matter control provided by a negative air pneumatic system using a pair of pneumatic fabric filters, identified as Sander Pneumatic Fabric Filters North and South (SN-13). Both Pneumatic Fabric Filters have one common discharge.

Following sanding, the MDF panels are either packaged or cut to customer specified dimensions. The cut-up saw is equipped with a pneumatic sawdust pickup system with a pneumatic fabric filter for control of particulate matter. This baghouse is identified as the Sawdust Pickup Pneumatic Fabric Filter (SN-12). Hog trim material from the cut-up saw is conveyed to the Trim Silo Cyclone. In order to further reduce the PM emissions vented to the atmosphere, Willamette has re-routed the Trim Silo Cyclone to an existing pneumatic fabric filter (SN-14) for an additional 99.9% PM capture efficiency.

As a final step in the manufacturing of medium density fiberboard, some of the finished panels are surfaced with a UV cured filler (SN-24). These panels are then transferred to the Ashdee dryer (SN-23). After finishing with the UV cured filler, the panels are sanded prior to shipment. The sander is equipped with a baghouse (SN-17) to control particulate matter.

Plant Steam: The Malvern MDF plant operates one boiler (SN-05) for steam production. The boiler is a Babcock & Wilcox boiler built in 1970 and installed at the Malvern facility in 1982. The boiler is rated at 64.78 MMBtu per hour and is used for Line 1 heating requirements. This boiler produces an average of 35,000 pounds per hour of steam. Line 1 boiler uses natural gas as the primary fuel and wood waste as the secondary fuel. The wood waste is supplied from sanding operations at the facility and is transported pneumatically and stored in the fuel silo (SN-14) which has a high efficiency cyclone and pneumatic fabric filter for particulate control (Fuel

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Silo Cyclone and Pneumatic Fabric Filter). Emissions from this boiler currently exhaust to an electrified filter bed (EFB). The EFB is identified as Electrified Filter Bed EFB (SN-11A). Emissions from the material captured by the EFB are collected by the EFB Pneumatic Fabric Filter (SN-11B).

In order to meet BACT control standards for PM, VOC, CO, and NO_x emissions, Willamette has replaced the Line 2 sanderdust fired boiler with a waste heat recovery boiler equipped with a natural gas low NO_x burner.

Regulations

Willamette 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 Arkansas Operating Air Permit Program (Regulation #26). The facility was considered a major stationary source under the Prevention of Significant Deterioration (PSD) regulations as found in 40 CFR 52.21 because it has previously been permitted for VOC and NO_x emissions in excess of 250 tpy. With the issuance of this permit, this facility is no longer a major stationary source under PSD, but this permit will retain the PSD BACT limits on emissions. Willamette is also subject to New Source Performance Standard (NSPS) 40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*.

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. This table, in itself, is not an enforceable condition of the permit.

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
	Total Allowable Emissions	PM	29.7	59.0	
		PM ₁₀	29.7	59.0	
		SO ₂	0.9	1.0	
		VOC*	34.0	82.3	
		CO	102.5	187.0	
		NO _x	142.2	175.3	
		Acetone	3.7	2.4	
		Acetaldehyd e	0.5	1.0	
		15.3	32.4		
		Formaldehyd e	9.6	14.4	
		0.3	0.2		
		Methanol	1.2	1.7	
		MIBK	1.6	3.6	
		Phenol			
		Styrene			
01	L1 Fiber Dryer West and East Cyclones, RTO	PM	9.5	11.9	16
		PM ₁₀	9.5	11.9	
		SO ₂	0.1	0.1	
		VOC*	11.0	27.4	
		CO	18.4	38.5	
		NO _x	30.1	63.3	
		Acetone	0.1	0.2	
		Acetaldehyd e	0.1	0.1	
		4.5	8.2		
		Formaldehyd e	2.9	3.9	
		0.1	0.1		
		Methanol	0.1	0.1	
		MIBK			
		Phenol			

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Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
04	L1-Weighed Fiber Fabric Filter	PM	0.4	1.5	18
		PM ₁₀	0.4	1.5	
		VOC*	0.4	1.0	
		Formaldehyd e	0.3	0.6	
		Methanol	0.2	0.5	
05	L1-Wood Fired Boiler Bypass Stack	PM	1.4	4.7	19
		PM ₁₀	1.4	4.7	
		SO ₂	0.1	0.2	
		VOC	0.3	0.9	
		CO	3.2	10.5	
		NO _x	12.5	41.9	
09	Cleanup and Shaveoff System	PM	0.2	0.7	21
		PM ₁₀	0.2	0.7	
		VOC*	0.5	1.5	
		Formaldehyd e	0.3	0.9	
		Methanol	0.2	0.7	
10	#2 Boiler	Source Removed From Service			
11A	Electrified Filter Bed	PM	5.5	1.3	22
		PM ₁₀	5.5	1.3	
		SO ₂	0.5	0.2	
		VOC*	0.3	0.1	
		CO	23.5	5.4	
		NO _x	77.6	17.8	
		Acetaldehyd e	0.1	0.1	
11B	Electrified Filter Bed	PM	0.1	0.1	22
		PM ₁₀	0.1	0.1	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
12	Sawdust Pickup	PM	0.3	1.2	25
		PM ₁₀	0.3	1.2	
		VOC*	2.3	2.9	
		Methanol	1.6	2.1	
		Phenol	0.7	0.9	
13	Sander Pneumatic Fabric Filters	PM	1.6	7.0	26
		PM ₁₀	1.6	7.0	
		VOC*	0.5	0.8	
		Acetone	0.1	0.2	
		Formaldehyde	0.1	0.1	
		Methanol	0.2	0.3	
		Phenol	0.3	0.5	
14	Trim & Fuel Silo Pneumatic Fabric Filter	PM	0.1	0.4	28
		PM ₁₀	0.1	0.4	
16	Dry Shavings Pneumatic Fabric Filter	PM	0.5	2.2	29
		PM ₁₀	0.5	2.2	
17	UV Filler Sander	PM	1.8	7.9	30
		PM ₁₀	1.8	7.9	
19	Raw Material Storage	PM	0.1	0.1	31
		PM ₁₀	0.1	0.1	
20	L1 Press Building Vents	Emissions routed to SN-01			
21	L2 Press Vents	Emissions routed to SN-26			

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Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
22	L1 Reject and Former Vacuum	PM	0.2	0.8	32
		PM ₁₀	0.2	0.8	
		VOC*	0.4	1.0	
		Formaldehyde	0.3	0.6	
		Methanol	0.2	0.5	
23	Ashdee Dryer	VOC*	1.3	3.3	33
		Styrene	1.3	3.3	
24	UV Fill/Laminating Line Fugitive Emissions	VOC*	0.3	0.3	34
		Acetone	3.3	1.7	
		Styrene	0.3	0.3	
26	L2 Fiber Dryer Cyclones, Thermal Oxidizer, and Waste Heat Recovery Boiler	PM	7.0	14.8	36
		PM ₁₀	7.0	14.8	
		SO ₂	0.2	0.5	
		VOC*	12.7	30.4	
		CO	57.4	132.6	
		NO _x	22.0	52.3	
		Acetone	0.1	0.1	
		Acetaldehyde	0.2	0.6	
			8.6	18.2	
		Formaldehyde	3.4	3.6	
			0.2	0.1	
		Methanol	0.1	0.2	
27	L2 Reject Cyclones	PM	0.3	1.4	39
		PM ₁₀	0.3	1.4	
		VOC*	0.5	1.5	
		Formaldehyde	0.3	0.9	
			0.2	0.7	
		Methanol			

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
28	L2 Former Vacuum	PM	0.3	1.2	40
		PM ₁₀	0.3	1.2	
		VOC*	0.5	1.5	
		Formaldehyd e	0.3	0.9	
			0.2	0.7	
		Methanol			
29	L2 Relay Dryer	PM	0.4	1.8	41
		PM ₁₀	0.4	1.8	
		VOC*	3.0	11.9	
		Acetone	0.1	0.2	
		Acetaldehyd e	0.1	0.2	
			0.6	2.0	
		Formaldehyd e	0.5	1.4	
		Methanol			

*VOC emissions include HAP emissions

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SECTION III: PERMIT HISTORY

On July 23, 1982, the Department issued Permit #688-A to Willamette Industries. This permit allowed Willamette to convert an existing particleboard plant (formerly operated by International Paper) to a medium density fiberboard plant.

On April 16, 1987, the Department issued Permit #688-AR-1 to Willamette Industries. This permit allowed Willamette to increase capacity by adding a second process line. This line consisted of the following sources: an additional fiber dryer (SN-02B), former vacuum (SN-03B), mat reject area (SN-05B), and conveying system for the shave off area and fiber bin (SN-06B). In conjunction with these additions, Willamette deleted various sources (SN-01, SN-04, and SN-08) and replaced cyclones on SN-06A and SN-09 with more efficient fabric filters.

On February 1, 1990, the Department issued Permit #688-AR-2 to Willamette Industries. This permit allowed Willamette to add an Ultra Violet Fill Line Sander (SN-15) to its operation. The emission control equipment used with this source is a simple pneumatic fabric filter with an estimated control efficiency of 99%.

On August 1, 1997, the Department issued Permit #688-AR-3 to Willamette Industries. This permitting action included retroactive applicability of the Prevention of Significant Deterioration (PSD) regulations to the original installation of Line 2 in 1989. Line 1 was not subject to retroactive PSD review. The potential to emit for Line 1 was less than the 250 ton per year (tpy) threshold for all pollutants, as originally installed in 1982, and thus, this facility was a minor source prior to the installation of Line 2. Modifications at the facility included installation of best available control technology (BACT) on Line 2, removing boiler #2 (SN-10) from service, and allowing both digesters to be fed to the Line 1 fiber dryer.

All units on Line 2, including the original wood waste fired boiler, the flash tube dryer and the board press were required to install BACT for CO, NO_x, PM, and VOCs. Additionally, emission increases at several material handling or finishing operations, associated with the installation of Line 2, are also required to install BACT. The BACT analysis is summarized below.

Summary of BACT Determination		
Source Description	Pollutant	Control Technology

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Original Line 2 Wood Waste Boiler	PM VOC NO _x CO	Remove boiler from service and replace with a waste heat recovery boiler which uses natural gas as a supplemental fuel.
Line 2 Fiber Dryer	PM VOC	Thermal Oxidizer
Line 2 Press Vents	PM	Permanent Total Enclosure and Baghouse
Line 2 Press Vents	VOC	No add on controls
Waste Heat Recovery Boiler	NO _x	Low NO _x burners
Waste Heat Recovery Boiler	CO	Good combustion practice
Resin Storage Tanks	VOC	No add on controls
Trim Cyclone	PM	Baghouse
Mat Reject	PM	Baghouse
Line 2 Former Vacuum	PM	Baghouse
Line 2 Relay Dryer	PM	Baghouse
Cleanup and Shaveoff System	PM	Baghouse (existing)
Sawdust Pickup	PM	Baghouse (existing)
Sander	PM	Baghouse (existing)
Fuel and Trim Silo	PM	Baghouse (existing)
Dry Silo	PM	Baghouse (existing)

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UV Fill Sander	PM	Baghouse (existing)
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SECTION IV: EMISSION UNIT INFORMATION

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SN-01
L1 Fiber Dryer East & West Cyclones-RTO

Source Description

The fiber and air stream from each flash tube dryer is discharged into two large diameter high-efficiency cyclones. This exhaust then passes through a regenerative thermal oxidizer.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated through compliance with Specific Condition #3.

Pollutant	lb/hr	tpy
PM ₁₀	9.5	11.9
SO ₂	0.1	0.1
VOC	11.0	27.2
CO	18.4	38.5
NO _x	30.1	63.3

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, 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 through compliance with Specific Condition #3.

Pollutant	lb/hr	tpy
PM	9.5	11.9
Acetone	0.1	0.2
Acetaldehyde	0.1	0.1
Formaldehyde	4.5	8.2

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Pollutant	lb/hr	tpy
Methanol	2.9	3.9
MIBK	0.1	0.1
Phenol	0.1	0.1

- Pursuant to §19.702 of Regulation 19, §18.1002 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall conduct testing to verify the emission rates listed for PM, PM₁₀, SO₂, VOC, CO, and NO_x. This testing shall be performed using an approved EPA test method or a method approved by the Department prior to its use. This testing shall be conducted with this source operating at 90% percent of its rated capacity. If 90% of the rated capacity cannot be achieved, this source shall be limited to a throughput 10% greater than the rate at which this source was tested. This testing shall be performed within 180 days of the date of issuance for this permit. A copy of these test results shall be submitted to the Department in accordance with Plantwide Condition #3.
- Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52 Subpart E, the material throughput at this source shall not exceed 118,095.6 tons per consecutive twelve month period. Compliance shall be demonstrated through compliance with Specific Condition #6.
- Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52 Subpart E, the permittee shall not produce more than 80 million square feet of MDF (3/4 inch basis) per consecutive twelve month period. Compliance shall be demonstrated through compliance with Specific Condition #6.
- Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of material throughput at this source and the amount of MDF produced at this source. These records shall be maintained on a monthly basis and updated monthly. These records shall be maintained on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision 7.
- Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 10% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SN-04
L1 Weighed Fiber

Source Description

This baghouse is used to control emissions from the air conveyance systems for Lines 1 and 2.

Specific Conditions

8. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM ₁₀	0.4	1.5
VOC	0.4	1.0

9. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM	0.4	1.5
Formaldehyde	0.3	0.6
Methanol	0.2	0.5

10. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SN-05
L1 Wood Fired Boiler-Bypass Stack

Source Description

This stack is only used when the line 1 boiler is burning only natural gas as fuel. When wood waste is being fired the emissions are routed to SN-11A-B. This boiler has a rating of 65 MMBtu/hr.

Specific Conditions

11. 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 this condition will be demonstrated by only emitting products of combustion of natural gas in boiler #1 at this source.

Pollutant	lb/hr	tpy
PM ₁₀	1.4	4.7
SO ₂	0.1	0.2
VOC	0.3	0.9
CO	3.2	10.5
NO _x	12.5	41.9

12. 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 only emitting products of combustion of natural gas in boiler #1 at this source.

Pollutant	lb/hr	tpy
PM	1.4	4.7

13. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated by only emitting products of combustion of natural gas in boiler #1 at this source.

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14. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6, the permittee shall not combust more than 540 MMft³ of natural gas at this source per consecutive twelve month period. Compliance shall be demonstrated through compliance with Specific Condition #15 .

15. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52 Subpart E, the permittee shall maintain records of the amount of natural gas combusted at this source. These records shall be maintained on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. These records shall be maintained on site and made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.

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SN-09
Cleanup and Shaveoff System - Pneumatic Fabric Filter

Source Description

Formed mats are trimmed to rough dimensions prior to pressing. This filter controls particulate emissions from these cleanup and shaveoff operations.

Specific Conditions

16. Pursuant to §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM ₁₀	0.2	0.7
VOC	0.5	1.5

17. Pursuant to §18.801 of Regulation #18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM	0.2	0.7
Formaldehyde	0.3	0.9
Methanol	0.2	0.7

18. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SN-11A and 11B
Electrified Filter Bed - Stack and Pneumatic Fabric Filter

Source Description

Particulate emissions from the burning of wood waste in the boiler (SN-05) are controlled by the EFB. The emissions are passed over the filter bed. Particulate emissions from the filter bed are controlled by a baghouse.

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 this condition will be demonstrated through compliance with Specific Condition #23.

SN	Pollutant	lb/hr	tpy
11A	PM ₁₀	5.5	1.3
	SO ₂	0.5	0.2
	VOC	0.3	0.1
	CO	23.5	5.4
	NO _x	77.6	17.8
11B	PM ₁₀	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 through compliance with Specific Condition #23.

SN	Pollutant	lb/hr	tpy
11A	PM	5.5	1.3
	Acetaldehyde	0.1	0.1
11B	PM	0.1	0.1

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21. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6, the permittee shall not operate this source more than 720 hours per consecutive 12 month period. Compliance shall be demonstrated through compliance with Specific Condition #22.
22. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52 Subpart E, the permittee shall maintain records of the hours of operation of this source. These records shall be maintained on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.
23. Pursuant to §19.702 of Regulation 19, §18.1002 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall conduct testing to verify the emission rates listed for PM, PM₁₀, SO₂, VOC, CO, NO_x, and acetaldehyde from SN-11A if this source is to be operated for more than a total of 60 days during the life of this permit. This testing shall be performed using an approved EPA test method or a method approved by the Department prior to its use. This testing shall be conducted with this source operating at 90% percent of its rated capacity. If 90% of the rated capacity cannot be achieved, this source shall be limited to a throughput 10% greater than the rate at which this source was tested. A copy of these test results shall be submitted to the Department in accordance with Plantwide Condition #3.
24. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from SN-11B shall not exceed 10% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7. Visible Emissions from SN-11A shall not exceed 20% opacity. Compliance shall be demonstrated through compliance with Specific Condition #25.
25. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct daily observations of the opacity from SN-11A when this source is operating and keep a record of these observations. If visible emissions appear to exceed those allowed in this permit, the permittee shall take corrective action and perform the observation again. If visible emissions still appear to exceed allowable limits, the permittee shall conduct a 6-minute opacity reading in accordance with EPA Reference Method #9. The results of these readings shall be kept on site and made available to Department personnel upon request.

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SN-12
Sawdust Pickup - Pneumatic Fabric Filter

Source Description

This baghouse controls emissions from the cut-up saw.

Specific Conditions

26. Pursuant to §19.901 et. seq. of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM ₁₀	0.3	1.2
VOC	2.3	2.9

27. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM	0.3	1.2
Methanol	1.6	2.1
Phenol	0.7	0.9

28. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SN-13
Sander Pneumatic Fabric Filters - C-16 & C-17

Source Description

All rough panels are sanded before being sawed to finished dimensions. These baghouses are used to control particulate emissions from these sanding operations.

Specific Conditions

29. Pursuant to §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM ₁₀	1.6	7.0
VOC	0.5	0.8

30. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM	1.6	7.0
Acetone	0.1	0.2
Formaldehyde	0.1	0.1
Methanol	0.2	0.3
Phenol	0.3	0.5

31. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SN-14
Trim & Fuel Silo Pneumatic Fabric Filter

Source Description

Emissions from the conveyance of hog material from the cut-up saw are controlled by this baghouse.

Specific Conditions

32. Pursuant to §19.901 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.4

33. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM	0.1	0.4

34. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SN-16
Dry Shavings Pneumatic Fabric Filter

Source Description

This filter controls emissions from the pneumatic transfer of dry shavings at this facility.

Specific Conditions

35. Pursuant to §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM ₁₀	0.5	2.2

36. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM	0.5	2.2

37. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SN-17
U.V. Filler Sander - Pneumatic Fabric Filter

Source Description

UV treated panels are sanded prior to shipping. This baghouse controls particulate emissions from this process.

Specific Conditions

38. Pursuant to §19.901 et seq of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM ₁₀	1.8	7.9

39. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM	1.8	7.9

40. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SN-19
Raw Material Storage

Source Description

Green wood chips are stored in this outdoor pile prior to their use.

Specific Conditions

41. 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 this condition will be demonstrated through compliance with Specific Condition #43.

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.1

42. 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 through compliance with Specific Condition #43.

Pollutant	lb/hr	tpy
PM	0.1	0.1

43. 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 cause unnecessary amounts of air contaminants to become airborne.

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SN-22
L1 Reject and Former Vacuum - Pneumatic Fabric Filter

Source Description

This baghouse controls particulate emissions from Line 1.

Specific Conditions

44. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM ₁₀	0.2	0.8
VOC	0.4	1.0

45. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM	0.2	0.8
Formaldehyde	0.3	0.6
Methanol	0.2	0.5

46. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SN-23
Ashdee Dryer

Source Description

This drier is used to cure the UV coating applied to some of the MDF. This is an infrared dryer.

Specific Conditions

47. 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 this condition will be demonstrated through compliance with Specific Condition #51.

Pollutant	lb/hr	tpy
VOC	1.3	3.3

48. 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 through compliance with Specific Condition #51.

Pollutant	lb/hr	tpy
Styrene	1.3	3.3

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SN-24
UV Fill/Laminating Line Fugitive Emissions

Source Description

Emissions from the UV resin and acetone used for cleanup occur at this source.

Specific Conditions

49. 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 this condition will be demonstrated through compliance with Specific Condition #51.

Pollutant	lb/hr	tpy
VOC	0.3	0.3

50. 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 through compliance with Specific Condition #51.

Pollutant	lb/hr	tpy
Acetone	3.3	1.7
Styrene	0.3	0.3

51. 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 Part 70.6, the permittee shall not use more than 2,120 gallons of UV fill coat per month. The VOC content of this UV fill coat shall not exceed 2.6 lb/gal. The permittee shall maintain records of the amount of UV filler used at this source and its VOC content. These records shall be maintained on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. These records shall be kept on site and made available to Department personnel upon request.
52. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use more than 500 gallons a year of acetone at this source. The permittee shall maintain records of the amount of acetone used at this source. These records shall be maintained on a monthly basis and updated by the 15th day of the month

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following the month to which the records pertain. These records shall be kept on site and made available to Department personnel upon request.

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SN-26

L2 Fiber Dryer Cyclones, Thermal Oxidizer & Waste Heat Recovery Boiler

Source Description

The fiber mixture used to make the fiber board is flash dried. Emissions from this process occur at this source. The thermal oxidizer is fired by natural gas. The waste heat recovery boiler is heated by the thermal oxidizer (78.4 MMBtu/hr) and its own natural gas low NO_x burner (90MMBtu/hr).

Specific Conditions

53. Pursuant to §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated through compliance with Specific Condition #55.

Pollutant	lb/hr	tpy
PM ₁₀	7.0	14.8
SO ₂	0.2	0.5
VOC	12.7	30.4
CO	57.4	132.6
NO _x	22.0	52.3

54. 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 through compliance with Specific Condition #55.

Pollutant	lb/hr	tpy
PM	7.0	14.8
Acetone	0.1	0.1
Acetaldehyde	0.2	0.6
Formaldehyde	8.6	18.2

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Pollutant	lb/hr	tpy
Methanol	3.4	3.6
MIBK	0.2	0.1
Phenol	0.1	0.2

55. Pursuant to §19.702 of Regulation 19, §18.1002 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall conduct testing to verify the emission rates listed for PM, PM₁₀, SO₂, VOC, CO, and NO_x. This testing shall be performed using an approved EPA test method or a method approved by the Department prior to its use. This testing shall be conducted with this source operating at 90% percent of its rated capacity. If 90% of the rated capacity cannot be achieved, this source shall be limited to a throughput 10% greater than the rate at which this source was tested. This testing shall be performed within 180 days of the date of issuance for this permit. A copy of these test results shall be submitted to the Department in accordance with Plantwide Condition #3.
56. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 10% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.
57. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, the permittee shall maintain records of the amount of natural gas combusted by the waste heat recovery boiler. These records shall be maintained on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. The records shall be maintained on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.
58. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52 Subpart E, the permittee shall not produce more than 125 million square feet of MDF (3/4 inch basis) per consecutive twelve month period. Compliance shall be demonstrated through compliance with Specific Condition #60.
59. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52 Subpart E, the material throughput at this source shall not exceed 184,527 tons per consecutive twelve month

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period. Compliance shall be demonstrated through compliance with Specific Condition #60.

60. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of material throughput at this source and the amount of MDF. These records shall be maintained on a monthly basis and updated monthly. These record shall be maintained on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision 7.

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SN-27
L2 Reject Cyclones - Pneumatic Fabric Filter

Source Description

This baghouse is used to control particulate emissions from Line 2.

Specific Conditions

61. Pursuant to §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM ₁₀	0.3	1.4
VOC	0.5	1.5

62. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM	0.3	1.4
Formaldehyde	0.3	0.9
Methanol	0.2	0.7

63. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SN-28
L2 Former Vacuum - Pneumatic Fabric Filter

Source Description

This baghouse is used to control particulate emissions from Line 2.

Specific Conditions

64. Pursuant to §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM ₁₀	0.3	1.2
VOC	0.5	1.5

65. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM	0.3	1.2
Formaldehyde	0.3	0.9
Methanol	0.2	0.7

66. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SN-29
L2 Relay Dryer - Pneumatic Fabric Filters (2)

Source Description

These baghouses control particulate emissions from the Line 2 air conveyance system.

Specific Conditions

67. Pursuant to §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM ₁₀	0.4	1.8
VOC	3.0	11.9

68. 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. Emission limits are based on testing and are assumed to be worst case.

Pollutant	lb/hr	tpy
PM	0.4	1.8
Acetone	0.1	0.2
Acetaldehyde	0.1	0.2
Formaldehyde	0.6	2.0
Methanol	0.5	1.4

69. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7.

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Willamette Industries, Inc. is in compliance with the applicable regulations cited in the permit application. Willamette Industries, 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.

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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 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, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
5. 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.

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6. 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.
7. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct weekly observations of the opacity from the emission units at this facility and keep a record of these observations. If visible emissions appear to exceed those allowed in this permit, the permittee shall take corrective action and perform the observation again. If visible emissions still appear to exceed allowable limits, the permittee shall conduct a 6-minute opacity reading in accordance with EPA Reference Method #9. The results of these readings shall be kept on site and made available to Department personnel upon request.
8. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52 Subpart E, and Consent Decree Civil No. CV'00-1001 HA: Item #13, the permittee shall, at the beginning of every month, record its maintenance plans for that month. To the extent practical, startup and shutdown of control technology systems will be performed during times when process equipment is also shut down for routine maintenance.
9. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52 Subpart E, the facility shall maintain records that demonstrate compliance with Plantwide Condition #8. These records shall be maintained on site and made available to Department personnel upon request.
10. Pursuant to §19.702 of Regulation 19, 40 CFR 52, and Consent Decree Civil No. CV'00-1001 HA: Item #17, the facility shall demonstrate initial compliance with the 90% destruction efficiency for the captured VOCs from the MDF dryers and presses. The facility shall undertake compliance testing in accordance with the schedule of Consent Decree Item #16 and the protocol submitted to EPA as required in Consent Decree Attachment 1.
11. Pursuant to §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, 40 CFR 52, and Consent Decree Civil No. CV'00-1001 HA: Items #23 and #24, in order to achieve and maintain the destruction efficiency required of the technology control systems, the facility shall establish a continuous parametric monitoring program. Parametric monitoring shall be conducted by establishing, through testing or otherwise, the parameters needed to be controlled (i.e., temperature and airflow), and the appropriate operating criteria to be maintained for each such parameter in order to ensure proper operation of the control technology system installed at a facility.
12. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and Consent Decree Civil No. CV'00-1001 HA: Item #25, immediately following the commencement of full-time operation of the control technology systems required by the Consent Decree, but in no event

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later than 3 months from start-up and shake down, the facility shall submit a proposed plan for Parametric Monitoring to EPA for review.

13. Pursuant to §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, 40 CFR 52, and Consent Decree Civil No. CV'00-1001 HA: Item #26, the permittee shall submit a modification to incorporate this parametric system and required monitoring and reporting into the Title V permit at the time that the permit comes up for renewal or with the next modification to this permit. A copy of the EPA's approval shall also be submitted with the application.
14. Pursuant to §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, 40 CFR 52, and Consent Decree Civil No. CV'00-1001 HA: Item #28, the facility shall reevaluate and calibrate, the parametric monitoring devices as necessary based on compliance demonstration tests as required by Item #17 of the Consent Decree.
15. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and Consent Decree Civil No. CV'00-1001 HA: Item #28, the facility shall provide an annual report documenting its calibration or review of the parameters and proposed changes if necessary. This report shall be a copy of the same report that is required by the EPA.
16. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, within 30 days of receipt of the EPA response to Plantwide Condition # 15, the facility shall submit a copy of the response to the Department at the following address.

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

17. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6, the permittee shall not UV treat more than a total of 27,404 Msf of MDF in the UV process which is made up of sources SN-17, SN-23, and SN-24 per consecutive twelve month period. Compliance shall be demonstrated through compliance with Plantwide Condition # 18.
18. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of MDF UV treated in the UV process which is made up of sources SN-17, SN-23, and SN-24. These records shall be maintained on a monthly basis

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and updated by the 15th day of the month following the month to which the records pertain. A rolling twelve month total shall be maintained. These records shall be maintained on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.

19. Pursuant to Consent Decree Civil No. CV'00-1001 Item #77, Plantwide Conditions referencing the consent decree are only applicable during the life of the Consent Decree.

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SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated July 1, 2001.

Description	Category
Resin Tanks	Group A, Number 13
Gasoline Storage Tank (1000 gallon)	Group A, Number 13
Refiner Reject Cyclone	Group A, Number 13

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix 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 VIII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and

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

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

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

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- i. 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.

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12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
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.

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19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - 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:

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- a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.