ADEQ
OPERATING
AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation No. 26:

Permit No. : 688-AOP-R2

IS ISSUED TO: Weyerhaeuser – Medium Density Fiberboard

Malvern, AR 72104

Hot Springs County

AFIN: 30-00015

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:

May 2, 2002 AND May 1, 2007

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date Modified

Table 1 - List of Acronyms

A.C.A.	Arkansas Code Annotated
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CSN	County Serial Number
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate matter
PM_{10}	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO_2	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	Weyerhaeuser – Medium Density Fiberboard
AFIN:	30-00015
PERMIT NUMBER:	688-AOP-R2
FACILITY ADDRESS:	1275 Willamette Road Malvern, AR 72104
COUNTY:	Hot Springs
CONTACT POSITION:	Brian Coston
TELEPHONE NUMBER:	(501) 337-9400
REVIEWING ENGINEER:	Kimberly O'Guinn
UTM North - South (Y):	Zone 15 3804.60
UTM East - West (X):	Zone 15 525.5

INTRODUCTION

Summary of Permit Activity

Weyerhaeuser – Medium Density Fiberboard operates a medium density fiberboard (MDF) manufacturing facility in Malvern, AR. 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. This permit modification is to install new natural gas fired burners at the Line 1 (SN-01) and Line 2 (SN-26) Dryers to replace the waste heat boiler and the steam coil heating system currently used. The emissions from the Line 1 Dryer burner will exit through the existing SN-01 stack and the emissions from the Line 2 Dryer burner will exit through the existing SN-26 stack. The proposed installation will not increase the MDF throughput capacity of the facility. Also this permit modification is to replace the thermal oxidizer on the Line 2 Dryer (SN-26) with the Regenerative Catalytic Oxidizer (RCO). Natural gas usage is substantially decreased with the use of the RCO technology. Line 1 Dryer is already equipped with an RCO. During the comment period, Weyerhaeuser requested that SN-17, SN-23, and SN-24 be removed from service. This permit modification incorporates the removal of these three sources. Total permitted SO_2, VOC, CO, NO_X, and formaldehyde emissions will increase by 4.8 tons/year (tpy), 9.5 tpy, 36.8 tpy, 3.4 tpy, and 7.6 tpy, respectively. Total permitted PM/PM_{10}, methanol, phenol, styrene, and acetone emissions will decrease by 5.7 tpy, 14.3 tpy, 0.1 tpy, 3.6 tpy, and 1.7 tpy, respectively.

Weyerhaeuser was previously considered a major stationary source under the Prevention of Significant Deterioration (PSD) regulations as found in 40 CFR 52.21, because it had been permitted for VOC and NO_x emissions in excess of 250 tpy. With the issuance of Permit #688-AOP-R0 the facility was no longer classified as a major stationary source under PSD, due to installation of Regenerative Thermal Oxidizer (RTO) on Line 1 and lower annual emissions of VOC and NO_x. Therefore, these modifications in this permit are not subject to PSD.

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% (±15%) green chips, 60% (±20%) dry planer shavings, and 10% (±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 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 a 50 MMBTU/hr natural gas fired burner 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, in 1997 Willamette 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 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). Line 1 and Line 2 press enclosure baghouse exhausts are routed 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, the Trim Silo Cyclone has been re-routed to an existing pneumatic fabric filter (SN-14) for an additional 99.9% PM capture efficiency.

Plant Steam: The Malvern MDF plant operates one boiler, the Lillie boiler (SN-30) for steam production. The boiler was built in 1979 by Nebraska Boiler Company and installed at the Malvern facility in 2003. The boiler was originally rated at 75 MMBtu per hour but Weyerhaeuser replaced the 75 MMBtu per hour burner with a Coen 60 MMBtu per hour low NOx burner. This boiler produces 55,000 to 60,000 pounds of steam per hour. The Lillie boiler uses natural gas as the only fuel.

Regulations

The following table contains the regulations applicable to this permit.

Table 2 - Regulations

Source No.	Regulation Citations
Facility	Regulation 18 - *Arkansas Air Pollution Control Code*
Facility	Regulation 19 - *Arkansas Plan of Implementation for Air Pollution Control*
Facility	Regulation 26 - *Arkansas Operating Air Permit Program*
SN-30	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. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

Table 3 – Emission Summary

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
Total Allowable Emissions		PM	22.3	51.3	
		PM_{10}	22.3	51.3	
		SO_2	2.1	6.1	
		VOC	35.3	95.3	
		CO	88.6	227.4	
		NO_x	60.1	150.9	
HAPs*		Acetaldehyde	0.3	0.4	
		Formaldehyde	11.2	22.4	
		Methanol	9.1	14.7	
		MIBK	0.2	0.2	
		Phenol	1.2	1.6	
Air Contaminants**		Acetone	0.4	0.7	

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
01	L1 Fiber Dryer West and East Cyclones, Regenerative Catalytic Oxidizer (RCO), L1 Dryer Burner	PM	17.3	30.3	17
		PM_{10}	17.3	30.3	
		SO_2	2.0	5.6	
		VOC	26.7	71.0	
		CO	85.4	213.3	
		NO_x	56.9	136.8	
		Acetone	0.2	0.3	
		Acetaldehyde	0.2	0.2	
		Formaldehyde	9.0	16.4	
		Methanol	5.8	7.8	
		MIBK	0.2	0.2	
		Phenol	0.2	0.2	
04	L1 – Weighed Fiber Fabric Filter	PM	0.4	1.5	20
		PM_{10}	0.4	1.5	
		VOC	0.4	1.0	
		Formaldehyde	0.3	0.6	
		Methanol	0.2	0.5	
05	L1 – Wood Fired Boiler Bypass Stack	Source Removed from Service			
09	Cleanup and Shaveoff System	PM	0.2	0.7	21
		PM_{10}	0.2	0.7	
		VOC	0.5	1.5	
		Formaldehyde	0.3	0.9	
		Methanol	0.2	0.7	
10	#2 Boiler	Source Removed from Service			
11A	Source removed from service				
11B	Source removed from serive				
12	Sawdust Pickup	PM	0.3	1.2	22
		PM_{10}	0.3	1.2	
		VOC	2.3	2.9	
		Methanol	1.6	2.1	
		Phenol	0.7	0.9	

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
13	Sander Pneumatic Fabric Filters	PM PM_{10} VOC Acetone Formaldehyde Methanol Phenol	1.6 1.6 0.5 0.1 0.1 0.2 0.3	7.0 7.0 0.8 0.2 0.1 0.3 0.5	23
14	Trim & Fuel Silo Pneumatic Fabric Filter	PM PM_{10}	0.1 0.1	0.4 0.4	24
16	Dry Shavings Pneumatic Fabric Filter	PM PM_{10}	0.5 0.5	2.2 2.2	25
17	UV Filler Sander	Source Removed from Service			
19	Raw Material Storage	PM PM_{10}	0.1 0.1	0.1 0.1	27
20	L1 Press Building Vents	Emissions routed to SN-01			
21	L2 Press Vents	Emissions routed to SN-26			
22	L1 Reject and Former Vacuum	PM PM_{10} VOC Formaldehyde Methanol	0.2 0.2 0.4 0.3 0.2	0.8 0.8 1.0 0.6 0.5	28
23	Ashdee Dryer	Source Removed from Service			
24	UV Fill/Laminating Line Fugitive Emissions	Source Removed from Service			
26	L2 Fiber Dryer Cyclone, RCO, and Waste Heat Recovery Boiler, L2 Dryer Burner	Emissions combined w/SN-01			29

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
27	L2 Reject Cyclones	PM	0.3	1.4	32
		PM_{10}	0.3	1.4	
		VOC	0.5	1.5	
		Formaldehyde	0.3	0.9	
		Methanol	0.2	0.7	
28	L2 Former Vacuum	PM	0.3	1.2	33
		PM_{10}	0.3	1.2	
		VOC	0.5	1.5	
		Formaldehyde	0.3	0.9	
		Methanol	0.2	0.7	
29	L2 Relay Dryer	PM	0.4	1.8	34
		PM_{10}	0.4	1.8	
		VOC	3.0	11.9	
		Acetone	0.1	0.2	
		Acetaldehyde	0.1	0.2	
		Formaldehyde	0.6	2.0	
		Methanol	0.5	1.4	
30	Lillie Boiler	PM	0.6	2.7	35
		PM_{10}	0.6	2.7	
		SO_2	0.1	0.5	
		VOC	0.5	2.2	
		CO	3.2	14.1	
		NO_x	3.2	14.1	

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

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

Section II: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
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
Mat Reject	PM	Baghouse
Line 2 Former Vacuum	PM	Baghouse
Line 2 Relay Dryer	PM	Baghouse
Cleanup and Shaveoff System	PM	Baghouse (existing)
Fuel and Trim Silo	PM	Baghouse (existing)

Summary of BACT Determination		
Source Description	Pollutant	Control Technology
Dry Silo	PM	Baghouse (existing)
UV Fill Sander	PM	Baghouse (existing)

On June 21, 2002 the Department issued Permit #688-AOP-R0. This modification included the following: emission rates at SN-26 were revised to reflect stack test results; SN-01 was replaced with a regenerative thermal oxidizer (RTO); emissions at SN-20 and SN-21 were routed to the inlet of the Line 1 and Line 2 dryers; and the emissions from SN-05 and SN-11 were revised to reflect the new mode of operation. Also, the Line 2 press enclosure baghouse exhaust was routed to the inlet of the Line 2 dryer, and the Line 1 press enclosure baghouse exhaust was routed to the inlet of the Line 1 dryer. Emissions from the facility were reduced to less than 250 tpy due to the addition of the RTO (SN-01) and the Electrified Filter Bed (SN-11).

On August 5, 2003 the Department issued Permit #688-AOP-R1. This modification allowed the facility to install a new natural gas fired Lillie Boiler (SN-30) to replace the L1 Wood-Fired Boiler (SN-05) that was destroyed by a cooling system failure. The installation did not increase the capacity of the facility. The facility also requested that SN-05 be removed from the permit. The new boiler is subject to NSPS Subpart Dc, *Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units.* Permitted PM/PM_{10} and NO_x emissions decreased by 2.0 tpy and 27.8 tpy, respectively. Permitted SO_2, VOC, and CO emissions increased by 0.3 tpy, 1.3 tpy, and 3.6 tpy, respectively.

Section III: EMISSION UNIT INFORMATION

SN - 01

L1 Fiber Dryer East & West Cyclones – RCO

Source Description

The fiber and air stream from each flash tube dryer (equipped with a 50 MMBTU/hr natural gas burner) is discharged into two large diameter high-efficiency cyclones. This exhaust then passes through a regenerative catalytic oxidizer.

Specific Conditions

1. 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 . [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 4 – Maximum Criteria Emission Rates

Pollutant	lb/hr*	Tpy*
PM_{10}	17.3	30.3
SO_2	2.0	5.6
VOC	26.7	71.0
CO	85.4	213.3
NO_X	56.9	136.8

* Emission rates are based upon maximum capacity and are combined with SN-26.

2. 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. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 5 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr*	Tpy*
PM	17.3	30.3
Acetone	0.2	0.3
Acetaldehyde	0.2	0.2
Formaldehyde	9.0	16.4
Methanol	5.8	7.8
MIBK	0.2	0.2
Phenol	0.2	0.2

* Emission rates are based upon maximum capacity and are combined with SN-26.

3. The permittee shall conduct testing to verify the emission rates listed for PM, PM_{10}, SO_2, 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 of permit 688-AOP-R0. A copy of these test results shall be submitted to the Department in accordance with Plantwide Condition #3. Note: This testing was completed on October 10 -11, 2002. [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]

4. Visible emissions from this source shall not exceed 10% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #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]

5. Natural gas shall be the only fuel used in the Line 1 Dryer burner. [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]

6. In accordance with the parametric monitoring plan developed pursuant to Plantwide Condition #14 and Consent Decree Civil No. CV'00-1001 HA: Items #23 and #24, the permittee shall maintain a minimum average combustion chamber temperature of 801°F and shall not exceed a maximum average air flow rate of 131,500 SCFM in the RCO. Temperature and air flow shall be recorded every 15 minutes and averaged every 12 hours. [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 and Consent Decree Civil No. CV'00-1001 HA]

7. The pressure differential across the beds, the position of the abort gates, and annual catalytic activity tests shall be monitored as operational status indicators for the RCOs. The pressure differential shall be recorded every hour and averaged every 24-hour period. The position of the abort gates are monitored continuously and recorded every 15 minutes. The catalytic activity test will be conducted annually to evaluate the oxidation potential of the RCO's catalytic media. [Pursuant to §19.703 of Regulation 19, §18.1003 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 40 CFR Part 52 and Consent Decree Civil No. CV'00-1001 HA]

SN - 04

L1 Weighed Fiber

Source Description

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

Specific Conditions

8. 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. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 6 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.4	1.5
VOC	0.4	1.0

9. 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. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 7 – Maximum Non-Criteria Emission Rates

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

10. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7 . [Regulation No. §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

11. 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. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 8 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.2	0.7
VOC	0.5	1.5

12. 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. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 9 – Maximum Non-Criteria Emission Rates

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

13. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7. [Regulation No. §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN - 12

Sawdust Pickup – Pneumatic Fabric Filter

Source Description

This baghouse controls emissions from the cut-up saw.

Specific Conditions

14. 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. [Regulation No. 19 §19.901 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 10 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.3	1.2
VOC	2.3	2.9

15. 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. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 11 – Maximum Non-Criteria Emission Rates

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

16. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7. [Regulation No. §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

17. 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. [Regulation No. 19 §19.901 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 12 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	1.6	7.0
VOC	0.5	0.8

18. 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. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 13 – Maximum Non-Criteria Emission Rates

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

19. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7 . [Regulation No. §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

20. 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. [Regulation No. 19 §19.901 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 14 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.4

21. 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. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 15 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.1	0.4

22. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7. [Regulation No. §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

23. 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. [Regulation No. 19 §19.901 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 16 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.5	2.2

24. 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. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 17 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.5	2.2

25. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7. [Regulation No. §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN - 17

U.V. Filler Sander – Pneumatic Fabric Filter

Source Description

The fabric filter for this source was previously used to control emissions from the sanding of the UV treated panels. This source is currently out of service since the facility is removing the UV line. This fabric filter will remain onsite. The facility is proposing to use this fabric filter in the future to control emissions from a proposed saw line. The facility will have the air permit modified before placing this source back into service.

SN - 19

Raw Material Storage

Source Description

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

Specific Conditions

26. 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 #28. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 18 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.1

27. 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 #28. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 19 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.1	0.1

28. The permittee shall not cause unnecessary amounts of air contaminants to become airborne. [Regulation No. §18.901 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN - 22

L1 Reject and Former Vacuum – Pneumatic Fabric Filter

Source Description

This baghouse controls particulate emissions from Line 1.

Specific Conditions

29. 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. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 20 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.2	0.8
VOC	0.4	1.0

30. 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. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 21 – Maximum Non-Criteria Emission Rates

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

31. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7. [Regulation No. §18.901 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN - 26

L2 Fiber Dryer Cyclones & Regenerative Catalytic Oxidizer

Source Description

The fiber mixture used to make the fiber board is flash dried in a 50 MMBtu/hr natural gas fired burner. Emissions from this process occur at this source. The catalytic oxidizer is fired by natural gas.

Specific Conditions

32. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated through compliance with Specific Condition #34. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 22 – Maximum Criteria Emission Rates

Pollutant	lb/hr*	Tpy*
PM_{10}	17.3	30.3
SO_2	2.0	5.6
VOC	26.7	71.0
CO	85.4	213.3
NO_x	56.9	136.8

* Emission rates are based upon maximum capacity and are combined with SN-01.

33. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated through compliance with Specific Condition #34. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 23 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr*	Tpy*
PM	17.3	30.3
Acetone	0.2	0.3

Pollutant	lb/hr*	Tpy*
Acetaldehyde	0.2	0.2
Formaldehyde	9.0	16.4
Methanol	5.8	7.8
MIBK	0.2	0.2
Phenol	0.2	0.2

* Emission rates are based upon maximum capacity and are combined with SN-01.

34. The permittee shall conduct testing on the new Regenerative Catalytic Oxidizer (SN-26) to verify the emission rates listed for PM, PM_{10}, SO_2, 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 §19.702 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]

35. 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.

36. Natural gas shall be the only fuel used in the Line 2 Dryer burner. [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]

37. Until testing required in Specific Condition #34 is completed, the permittee shall maintain a minimum average combustion chamber temperature of 801°F and shall not exceed a maximum average air flow rate of 131,500 SCFM in the RCO. Temperature and air flow shall be recorded every 15 minutes and averaged every 12 hours. If the testing demonstrates different compliance thresholds are necessary to assure 90% destruction efficiency for captured VOCs, the permittee shall meet the thresholds necessary to assure compliance and submit an application to amend this permit within 90 days of completion of the testing. [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]

38. The pressure differential across the beds, the position of the abort gates, and annual catalytic activity tests shall be monitored as operational status indicators for the RCOs. The pressure differential shall be recorded every hour and averaged every 24-hour period. The position of the abort gates are monitored continuously and recorded every 15 minutes. The catalytic activity test will be conducted annually to evaluate the oxidation potential of the RCO's catalytic media. [Pursuant to §19.703 of Regulation 19, §18.1003 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 40 CFR Part 52 and Consent Decree Civil No. CV'00-1001 HA]

SN - 27

L2 Reject Cyclones – Pneumatic Fabric Filter

Source Description

This baghouse controls particulate emissions from Line 2.

Specific Conditions

39. 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. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 24 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.3	1.4
VOC	0.5	1.5

40. 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. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 25 – Maximum Non-Criteria Emission Rates

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

41. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7. [Regulation No. §18.901 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN - 28

L1 Reject and Former Vacuum – Pneumatic Fabric Filter

Source Description

This baghouse controls particulate emissions from Line 2.

Specific Conditions

42. 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. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 26 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.3	1.2
VOC	0.5	1.5

43. 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. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 27 – Maximum Non-Criteria Emission Rates

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

44. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7. [Regulation No. §18.901 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN - 29

L2 Relay Dryer – Pneumatic Fabric Filter (2)

Source Description

This baghouse controls particulate emissions from Line 2 air conveyance system.

Specific Conditions

45. 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. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 28 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.4	1.8
VOC	3.0	11.9

46. 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. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 29 – Maximum Non-Criteria Emission Rates

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

47. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #7. [Regulation No. §18.901 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN - 30

Lillie Boiler

Source Description

The Lillie Boiler is used for Line 1 and Line 2 heating requirements. The boiler produces approximately 60,000 lb/hr of steam.

Specific Conditions

48. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated through compliance with Specific Condition #51. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 30 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.6	2.7
SO_2	0.1	0.5
VOC	0.5	2.2
CO	3.2	14.1
NO_x	3.2	14.1

49. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated through compliance with Specific Condition #51. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 31 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.6	2.7

50. The permittee shall not cause to be discharged to the atmosphere from the Lillie Boiler gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Appendix A. Compliance shall be demonstrated by only emitting products of combustion of natural gas in the Lillie Boiler (SN-30). [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

51. The permittee shall not combust more than 701 $MMft^3$ of natural gas at this source per consecutive twelve month period. Compliance shall be demonstrated through compliance with Specific Condition #52. [§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]

52. The permittee shall comply with all applicable regulations under 40 CFR Part 60, Subpart Dc. The permittee shall maintain records of the amount of natural gas combusted. These records shall be maintained on a monthly basis and updated monthly. The permittee is required to maintain these records for at least two years. [§19.304 of Regulation 19 and 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*]

Section IV: COMPLIANCE PLAN AND SCHEDULE

Weyerhaeuser – Medium Density Fiberboard is in compliance with the applicable regulations cited in the permit application. Weyerhaeuser – Medium Density Fiberboard will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

Section V: Plant Wide Conditions

1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No.19 §19.410(B) of and, 40 CFR Part 52, Subpart E]

3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No.19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

4. The permittee must provide: [Regulation No.19 §19.702 and/or Regulation No.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
   d. Utilities for sampling and testing equipment.

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No.19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. 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. [Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

8. The combined wood fiber material throughput at SN-01 and SN-26 shall not exceed 302,622.6 tons per consecutive twelve month period. Compliance shall be demonstrated through compliance with Plantwide Condition #10. [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]

9. The permittee shall not produce more than 205 million square feet of MDF (3/4 inch basis) per consecutive twelve month period at SN-01 and SN-26 combined. Compliance shall be demonstrated through compliance with Plantwide Condition #10. [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]

10. The permittee shall maintain records of the amount of material throughput and the amount of MDF produced at SN-01 and SN-26. 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 §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]

11. 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. [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]

12. The facility shall maintain records that demonstrate compliance with Plantwide Condition #11. These records shall be maintained on site and made available to Department personnel upon request. [Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52 Subpart E]

13. 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. [Pursuant to §19.702 of Regulation 19, 40 CFR 52, and Consent Decree Civil No. CV'00-1001 HA: Item #17]

14. 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. [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]

15. Immediately following the commencement of full-time operation of the control technology systems required by the Consent Decree, but in no event later than 3 months from start-up and shake down, the facility shall submit a proposed plan for Parametric Monitoring to EPA for review. The Parametric Monitoring Plan was submitted to EPA in April, 2003. [Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, Consent Decree Civil No. CV'00-1001 HA: Item #25]

16. 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. [Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and Consent Decree Civil No. CV'00-1001 HA: Item #28]

17. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, within 30 days of receipt of the EPA response to Plantwide Condition #16, 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

18. 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.

Title VI Provisions

19. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
    a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
    b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.

c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

20. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]

    a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
    b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
    c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
    d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)
    e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
    f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

21. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

22. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

    The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

23. The permittee can switch from any ozone-depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

Section VI: Insignificant Activities

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated July 1, 2001.

Table 32 - Insignificant Activities

Description	Category
Resins 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 Department determined the emission units, operations, or activities contained in Regulation 19, Appendix B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

Section VII:GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.[40 CFR 70.6(b)(2)]

2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]

3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation No. 26 §26.406]

4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]
   a. The date, place as defined in this permit, and time of sampling or measurements;
   b. The date(s) analyses performed;
   c. The company or entity performing the analyses;
   d. The analytical techniques or methods used;
   e. The results of such analyses; and
   f. The operating conditions existing at the time of sampling or measurement.

6. The permittee must retain the records of all required monitoring data and support information for at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every 6 months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within 30 days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26 §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]

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

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. The permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:

   a. The facility name and location
   b. The process unit or emission source 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
   i. The name of the person submitting the report.

9. The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

10. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5) and §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]

11. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]

12. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]

13. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]

14. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]

15. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]

16. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 19. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]

17. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]

18. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]

19. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]

20. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]

21. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]
    a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
    d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

22. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]

a. The identification of each term or condition of the permit that is the basis of the certification;
b. The compliance status;
c. Whether compliance was continuous or intermittent;
d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; 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.

23. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]

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.

24. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]