

# ADEQ OPERATING AIR PERMIT

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

Permit No. : 0688-AOP-R5

Renewal #1

IS ISSUED TO:

Flakeboard America LLC

1275 Willamette Road

Malvern, AR 72104

Hot Spring 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:

AND

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

Signed:

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Mike Bates  
Chief, Air Division

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Date

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#### List of Acronyms and Abbreviations

|                  |   |
|------------------|---|
| A.C.A.           | Arkansas Code Annotated                     |
| AFIN             | ADEQ Facility Identification Number         |
| CFR              | Code of Federal Regulations                 |
| CO               | Carbon Monoxide                             |
| HAP              | Hazardous Air Pollutant                     |
| lb/hr            | Pound Per Hour                              |
| MVAC             | Motor Vehicle Air Conditioner               |
| No.              | Number                                      |
| NO <sub>x</sub>  | Nitrogen Oxide                              |
| PM               | Particulate Matter                          |
| PM <sub>10</sub> | Particulate Matter Smaller Than Ten Microns |
| SNAP             | Significant New Alternatives Program (SNAP) |
| SO <sub>2</sub>  | Sulfur Dioxide                              |
| SSM              | Startup, Shutdown, and Malfunction Plan     |
| Tpy              | Tons Per Year                               |
| UTM              | Universal Transverse Mercator               |
| VOC              | Volatile Organic Compound                   |

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**SECTION I: FACILITY INFORMATION**

PERMITTEE: Flakeboard America LLC

AFIN: 30-00015

PERMIT NUMBER: 0688-AOP-R5

FACILITY ADDRESS: 1275 Willamette Road  
Malvern, AR 72104

MAILING ADDRESS: 1275 Willamette Road  
Malvern, AR 72104

COUNTY: Hot Spring

CONTACT POSITION: Mike Rhodes

TELEPHONE NUMBER: (501) 337-9400

REVIEWING ENGINEER: Joseph Hurt

UTM North South (Y): Zone 15: 3804.60 km

UTM East West (X): Zone 15: 525.50 km

## SECTION II: INTRODUCTION

### Summary of Permit Activity

Flakeboard America, LLC (Flakeboard), formerly Weyerhaeuser, operates a medium density fiberboard (MDF) manufacturing facility outside the city of 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 machineability and surface characteristics. This is the first Title V renewal for the facility. With the renewal, Flakeboard has submitted additional information to address all applicable requirements of 40 CFR 63, Subpart DDDD - National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. Additionally, Flakeboard has requested the removal of the entire Saw Line from service, thus removing the Saw Line Baghouse (SN-31). Updated factors provided by the National Council for Air and Stream Improvement (NCASI) were used in calculating HAP emission rates. With the removal of SN-31 and updated emission factors, the renewal will result in permitted annual emission decreases of 11.5 tpy of PM/PM<sub>10</sub> and 0.3 tpy of VOC.

### Process Description

Raw Material Storage: Two basic raw materials are used to manufacture MDF: wood residuals (from sawmills, green chips, 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 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.

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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 120°F to 150°F) is directed into dual high efficiency cyclones, followed by Regenerative Catalytic Oxidizers (RCOs). 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 pneumatic fiber transport system provides low temperature and humidity for the line 2 system during conveyance to the fiber metering bins.

In order to meet BACT standards for the Line 2 Dryer Cyclone Vent PM and VOC emissions, in 1997 Flakeboard installed a thermal oxidizer equipped with a low NO<sub>x</sub> burner on the Line 2 dryer cyclones. This was subsequently replaced with an RCO. 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 Pneumatic Fiber Transport System Cyclone and two Pneumatic Fabric Filters (SN-29), respectively. Line 1 uses the L1 Reject Cyclone and Former Vacuum plus two Pneumatic Fabric Filters (SN-22 and SN-22a) 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).

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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. 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 two pneumatic fabric filters for control of particulate matter. These baghouse are identified as the Sawdust Pickup Pneumatic Fabric Filter (SN-12) and the Reclaim Silo Baghouse (SN-32). 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. In 2003, the boiler was refurbished and installed at the Malvern Facility. The cost to refurbish the unit was determined to be less than one-half the cost of replacing the unit, therefore the unit is not considered re-constructed per 40 CFR 63.2. The boiler is rated at 78.4 million British thermal units per hour (mmBtu/hr) and is utilized for Line 1 heating requirements. This boiler produces an average of 60,000 pounds of steam per hour. The Lillie boiler uses natural gas as the only fuel.

In order to meet BACT standards for NO<sub>x</sub>, VOC, CO, and PM emissions, the facility has replaced the Line 2 Woodwaste-Fired Boiler with a package boiler equipped with a natural gas low NO<sub>x</sub> burner

### Regulations

The following table contains the regulations applicable to this permit.

| Source No. | Regulation Citations  |
|------------|---|
| Facility   | Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999                                     |
| Facility   | Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective May 28, 2006 |
| Facility   | Regulations of the Arkansas Operating Air Permit Program, Regulation 26,  |

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| Source No. | Regulation Citations  |
|------------|---|
|            | effective September 26, 2002  |
| SN-30      | 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units  |
| Plantwide  | 40 CFR 63 Subpart DDDD - <i>National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products</i>                                       |
| SN-30*     | 40 CFR 63 Subpart DDDDD - <i>National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters</i> |

\* - SN-30 is only subject to the initial notification requirements in §63.9(b) as described in §63.7506(b).

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

### Emission Summary

| EMISSION SUMMARY          |   |                  |                |       |
|---------------------------|---|------------------|----------------|-------|
| Source Number             | Description   | Pollutant        | Emission Rates |       |
|                           |   |                  | lb/hr          | tpy   |
| Total Allowable Emissions |   | PM               | 23.1           | 53.9  |
|                           |   | PM <sub>10</sub> | 23.1           | 53.9  |
|                           |   | SO <sub>2</sub>  | 2.1            | 6.1   |
|                           |   | VOC              | 35.4           | 95.3  |
|                           |   | CO               | 88.6           | 227.4 |
|                           |   | NO <sub>x</sub>  | 60.1           | 150.9 |
| HAPs                      |   | Acetaldehyde*    | 0.27           | 0.40  |
|                           |   | Formaldehyde*    | 7.50           | 12.67 |
|                           |   | Methanol*        | 8.96           | 14.28 |
|                           |   | MIBK*            | 0.20           | 0.20  |
|                           |   | Phenol*          | 1.11           | 1.47  |
| Air Contaminants **       |   | Acetone**        | 0.33           | 0.60  |
| SN                        | Description   | Pollutant        | lb/hr          | tpy   |
| 01                        | Line 1 Fiber Dryer West & East Cyclones, Line 1 Press and RCO | PM               | 17.3           | 30.3  |
|                           |   | PM <sub>10</sub> | 17.3           | 30.3  |
|                           |   | SO <sub>2</sub>  | 2.0            | 5.6   |
|                           |   | VOC              | 26.7           | 71.0  |
|                           |   | CO               | 85.4           | 213.3 |
|                           |   | NO <sub>x</sub>  | 56.9           | 136.8 |
|                           |   | Acetone          | 0.2            | 0.3   |
|                           |   | Acetaldehyde     | 0.2            | 0.2   |
|                           |   | Formaldehyde     | 6.22           | 10.7  |
|                           |   | Methanol         | 5.8            | 7.8   |



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|     |   |                             |      |      |
|-----|---|-----------------------------|------|------|
|     |   | MIBK                        | 0.2  | 0.2  |
|     |   | Phenol                      | 0.2  | 0.2  |
| 04  | Line 1 Weighed Fiber Fabric Filter          | PM                          | 0.4  | 1.4  |
|     |   | PM <sub>10</sub>            | 0.4  | 1.4  |
|     |   | VOC                         | 0.4  | 1.0  |
|     |   | Formaldehyde                | 0.23 | 0.09 |
|     |   | Methanol                    | 0.18 | 0.41 |
| 05  |   | Source Removed from Service |      |      |
| 09  | Cleanup and Shaveoff System                 | PM                          | 0.1  | 0.2  |
|     |   | PM <sub>10</sub>            | 0.1  | 0.3  |
|     |   | VOC                         | 0.5  | 1.5  |
|     |   | Formaldehyde                | 0.26 | 0.15 |
|     |   | Methanol                    | 0.20 | 0.64 |
| 10  | #2 Boiler                                   | Source Removed from Service |      |      |
| 11A | Electrified Filter Bed                      | Source Removed from Service |      |      |
| 11B | Electrified Filter Bed                      | Source Removed from Service |      |      |
| 12  | Sawdust Pickup                              | PM                          | 0.1  | 0.5  |
|     |   | PM <sub>10</sub>            | 0.1  | 0.5  |
|     |   | VOC                         | 2.3  | 2.9  |
|     |   | Formaldehyde                | 0.02 | 0.09 |
|     |   | Methanol                    | 1.59 | 2.04 |
|     |   | Phenol                      | 0.63 | 0.82 |
| 13  | Sander Pneumatic Fabric Filters             | PM                          | 0.5  | 2.1  |
|     |   | PM <sub>10</sub>            | 0.5  | 2.1  |
|     |   | VOC                         | 0.5  | 0.8  |
|     |   | Formaldehyde                | 0.04 | 0.07 |
|     |   | Methanol                    | 0.15 | 0.23 |
|     |   | Phenol                      | 0.28 | 0.45 |
|     |   | Acetone                     | 0.07 | 0.11 |
| 14  | Trim & Fuel Silo Pneumatic Fabric Filter    | PM                          | 0.1  | 0.2  |
|     |   | PM <sub>10</sub>            | 0.1  | 0.2  |
| 16  | Dry Shavings Pneumatic Fabric Filter        | PM                          | 0.1  | 0.5  |
|     |   | PM <sub>10</sub>            | 0.1  | 0.5  |
| 17  | UV Filler Sander                            | Source Removed from Service |      |      |
| 19  | Raw Material Storage                        | PM                          | 0.1  | 0.1  |
|     |   | PM <sub>10</sub>            | 0.1  | 0.1  |
| 20  | Line 1 Press Building Vents                 | Emissions routed to SN-01   |      |      |
| 21  | Line 2 Press Vents                          | Emissions routed to SN-26   |      |      |
| 22  | Line 1 Reject and Former Vacuum Baghouse #1 | PM                          | 0.2  | 0.8  |
|     |   | PM <sub>10</sub>            | 0.2  | 0.8  |

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|     |   |                                    |      |      |
|-----|---|------------------------------------|------|------|
|     |   | VOC                                | 0.4  | 1.0  |
|     |   | Formaldehyde                       | 0.15 | 0.09 |
|     |   | Methanol                           | 0.2  | 0.5  |
| 22a | Line 1 Reject and Former Vacuum Baghouse #2       | PM                                 | 0.4  | 1.5  |
|     |   | PM <sub>10</sub>                   | 0.4  | 1.5  |
|     |   | VOC                                | ***  | ***  |
|     |   | Formaldehyde                       | ***  | ***  |
|     |   | Methanol                           | ***  | ***  |
| 23  | Ashdee Dryer                                      | Source Removed from Service        |      |      |
| 24  | UV Fill/Laminating Line Fugitive Emissions        | Source Removed from Service        |      |      |
| 26  | Line 2 Fiber Dryer Cyclones, Line 2 Press and RCO | Emissions combined with SN-01      |      |      |
| 27  | Line 2 Reject Cyclones                            | PM                                 | 0.1  | 0.3  |
|     |   | PM <sub>10</sub>                   | 0.1  | 0.3  |
|     |   | VOC                                | 0.5  | 1.5  |
|     |   | Formaldehyde                       | 0.26 | 0.15 |
|     |   | Methanol                           | 0.20 | 0.64 |
| 28  | Line 2 Former Vacuum                              | PM                                 | 0.1  | 0.3  |
|     |   | PM <sub>10</sub>                   | 0.1  | 0.3  |
|     |   | VOC                                | 0.5  | 1.5  |
|     |   | Formaldehyde                       | 0.26 | 0.15 |
|     |   | Methanol                           | 0.20 | 0.64 |
| 29  | Line 2 Pneumatic Fiber Transport System           | PM                                 | 0.1  | 0.5  |
|     |   | PM <sub>10</sub>                   | 0.1  | 0.5  |
|     |   | VOC                                | 3.1  | 11.9 |
|     |   | Acetone                            | 0.06 | 0.19 |
|     |   | Acetaldehyde                       | 0.07 | 0.20 |
|     |   | Formaldehyde                       | 0.06 | 1.18 |
|     |   | Methanol                           | 0.44 | 1.38 |
| 30  | Lillie Boiler<br>78.4 MMBtu/hr                    | PM                                 | 0.6  | 2.7  |
|     |   | PM <sub>10</sub>                   | 0.6  | 2.7  |
|     |   | SO <sub>2</sub>                    | 0.1  | 0.5  |
|     |   | VOC                                | 0.5  | 2.2  |
|     |   | CO                                 | 3.2  | 14.1 |
|     |   | NO <sub>x</sub>                    | 3.2  | 14.1 |
| 31  | Saw Line Baghouse                                 | Source Removed from Service (2006) |      |      |
| 32  | Reclaim Silo Baghouse                             | PM                                 | 0.1  | 0.4  |
|     |   | PM <sub>10</sub>                   | 0.1  | 0.4  |
| 33  | Cooling Towers                                    | PM                                 | 2.8  | 12.0 |
|     |   | PM <sub>10</sub>                   | 2.8  | 12.0 |

\* - 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.

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\*\*\* - VOC and HAP emissions from SN-22 and SN-22a are bubbled together. PM/PM<sub>10</sub> emissions are based on equipment capacity.

### 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<sub>x</sub>, 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<br>VOC<br>NO <sub>x</sub><br>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<br>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 <sub>x</sub>                    | Low NO <sub>x</sub> burners   |
| Waste Heat Recovery Boiler        | CO                                 | Good combustion practice  |

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|   |     |                     |
|---|-----|---------------------|
| Resin Storage Tanks                     | VOC | No add on controls  |
| Mat Reject                              | PM  | Baghouse            |
| Line 2 Former Vacuum                    | PM  | Baghouse            |
| Line 2 Pneumatic Fiber Transport System | PM  | Baghouse            |
| Cleanup and Shaveoff System             | PM  | Baghouse (existing) |
| Fuel and Trim Silo                      | PM  | Baghouse (existing) |
| 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<sub>10</sub> and NO<sub>x</sub> emissions decreased by 2.0 tpy and 27.8 tpy, respectively. Permitted SO<sub>2</sub>, VOC, and CO emissions increased by 0.3 tpy, 1.3 tpy, and 3.6 tpy, respectively.

On June 24, 2004, the Department issued Permit #688-AOP-R2 to Weyerhaeuser. This permit modification was 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 exit through the SN-01 stack and the emissions from the Line 2 Dryer burner exit through the SN-26 stack. This installation did not increase the MDF throughput capacity of the facility. In addition, this permit modification allowed the replacement of the thermal oxidizer on the Line 2 Dryer (SN-26) with the Regenerative Catalytic Oxidizer (RCO). Natural gas usage substantially decreased with the use of the RCO technology. Line 1 Dryer was already equipped with an RTO. During the comment period, Weyerhaeuser requested that SN-17, SN-23, and SN-24 be removed from service. This permit modification incorporated the removal of those three sources. Total permitted SO<sub>2</sub>, VOC, CO, NO<sub>x</sub>, and formaldehyde emissions increased by 4.8 tons/year (tpy), 9.5 tpy, 36.8 tpy, 3.4 tpy, and 7.6 tpy, respectively. Total permitted PM/PM<sub>10</sub>, methanol, phenol, styrene, and acetone emissions decreased by 5.7 tpy, 14.3 tpy, 0.1 tpy, 3.6 tpy, and 1.7 tpy, respectively.

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On May 19, 2005 Permit #688-AOP-R3 was issued to Weyerhaeuser. This permit modification allowed Weyerhaeuser to install a new saw line (SN-31) which is controlled by a baghouse (previously used to control the UV line) and add a new baghouse (SN-22a) to Line 1 reject cyclone and former vacuum. Emissions from the new baghouse (SN-22a) were combined with the other emissions from Line 1 (SN-22). SN-22a was proposed in order to alleviate some of current load on the SN-22 baghouse. No production increases were proposed with the modification at Line 1. Overall, this modification resulted in permitted annual emission increases of 1.9 tons of PM/PM<sub>10</sub>, 0.3 tons of VOC, and 0.28 tons of combined HAPs (Methanol and Phenol).

Weyerhaeuser (formerly Willamette Industries, Inc.) 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<sub>x</sub> 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<sub>x</sub>. Therefore, these modifications in this permit were not subject to PSD.

On March 31, 2006 Permit #0688-AOP-R4 was issued to Flakeboard America, LLC. This permit modification allowed the following:

- The replacement of the existing baghouse SN-14 with a new baghouse with a better air-to-cloth ratio.
- The relocation of the existing SN-14 baghouse to control emissions from the Reclaim Silo Cyclone (SN-32).
- The addition of four existing cooling towers (SN-33) to the permit.
- The addition of two diesel pumps which will be used for emergency fire fighting.

Overall, the modification resulted in permitted annual emission increases of 12.2 tons of PM/PM<sub>10</sub>.

**SECTION IV: SPECIFIC CONDITIONS**

SN-01

Line 1 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. The permittee shall demonstrate compliance with this condition by Specific Condition # 4 and Plantwide Conditions # 8 and # 9. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr* | Tpy*  |
|------------------|--------|-------|
| PM <sub>10</sub> | 17.3   | 30.3  |
| SO <sub>2</sub>  | 2.0    | 5.6   |
| VOC              | 26.7   | 71.0  |
| CO               | 85.4   | 213.3 |
| NO <sub>x</sub>  | 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. The permittee shall demonstrate compliance with this condition by Specific Condition #4. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant    | lb/hr* | Tpy* |
|--------------|--------|------|
| PM           | 17.3   | 30.3 |
| Acetone      | 0.2    | 0.3  |
| Acetaldehyde | 0.2    | 0.2  |
| Formaldehyde | 6.22   | 10.7 |
| Methanol     | 5.8    | 7.8  |

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|        |     |     |
|--------|-----|-----|
| MIBK   | 0.2 | 0.2 |
| Phenol | 0.2 | 0.2 |

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

3. Visible emissions from this source shall not exceed 10% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition # 7. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
4. Natural gas shall be the only fuel used in the Line 1 Dryer burner. [§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]



SN-04  
Line 1 Weighed Fiber

Source Description

This baghouse is used to control emission from the air conveyance systems for Line 1.

The uncontrolled emissions from SN-04 fulfill the applicability criteria of the Compliance Assurance Monitoring (CAM) Rule (40 Code of Federal Regulations (CFR) Part (§) 64). Accordingly, the (CAM) Plan for the facility is provided in Appendix D. Per §64.2(a), the aforementioned source is regulated under the CAM Rule because it meets the following criteria: (1) the unit is subject to emission limitations for PM<sub>10</sub>, (2) the source is equipped with a control device (i.e., baghouse, filter), and (3) the unit has potential pre-control emissions of PM<sub>10</sub> that exceed the applicable major source threshold (i.e., 100 tons per year). In accordance with §64.3, Flakeboard America, LLC has developed a CAM Plan for this source. The Plan establishes the operating parameters that will be monitored in order to demonstrate compliance with the PM<sub>10</sub> emission limit at this source.

Specific Conditions

5. 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. The permittee shall demonstrate compliance with this condition by Specific Condition # 7. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy |
|------------------|-------|-----|
| PM <sub>10</sub> | 0.4   | 1.4 |
| VOC              | 0.5   | 1.7 |

6. 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 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant    | lb/hr | tpy  |
|--------------|-------|------|
| PM           | 0.33  | 1.39 |
| Formaldehyde | 0.23  | 0.94 |
| Methanol     | 0.18  | 0.73 |

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7. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Conditions # 7 and # 31. [§18.501 of Regulation 18 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.

The uncontrolled emissions from SN-09 fulfill the applicability criteria of the Compliance Assurance Monitoring (CAM) Rule (40 Code of Federal Regulations (CFR) Part (§) 64). Accordingly, the (CAM) Plan for the facility is provided in Appendix D. Per §64.2(a), the aforementioned source is regulated under the CAM Rule because it meets the following criteria: (1) the unit is subject to emission limitations for PM<sub>10</sub>, (2) the source is equipped with a control device (i.e., baghouse, filter), and (3) the unit has potential pre-control emissions of PM<sub>10</sub> that exceed the applicable major source threshold (i.e., 100 tons per year). In accordance with §64.3, Flakeboard America, LLC has developed a CAM Plan for this source. The Plan establishes the operating parameters that will be monitored in order to demonstrate compliance with the PM<sub>10</sub> emission limit at this source.

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. The permittee shall demonstrate compliance with this condition by Specific Condition # 10. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy |
|------------------|-------|-----|
| PM <sub>10</sub> | 0.1   | 0.3 |
| VOC              | 0.5   | 1.5 |

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 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant    | lb/hr | tpy  |
|--------------|-------|------|
| PM           | 0.05  | 0.21 |
| Formaldehyde | 0.26  | 0.82 |
| Methanol     | 0.20  | 0.64 |

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10. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Conditions # 7 and # 31. [§18.501 of Regulation 18 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.

The uncontrolled emissions from SN-12 fulfill the applicability criteria of the Compliance Assurance Monitoring (CAM) Rule (40 Code of Federal Regulations (CFR) Part (§) 64). Accordingly, the (CAM) Plan for the facility is provided in Appendix D. Per §64.2(a), the aforementioned source is regulated under the CAM Rule because it meets the following criteria: (1) the unit is subject to emission limitations for PM<sub>10</sub>, (2) the source is equipped with a control device (i.e., baghouse, filter), and (3) the unit has potential pre-control emissions of PM<sub>10</sub> that exceed the applicable major source threshold (i.e., 100 tons per year). In accordance with §64.3, Flakeboard America, LLC has developed a CAM Plan for this source. The Plan establishes the operating parameters that will be monitored in order to demonstrate compliance with the PM<sub>10</sub> emission limit at this source.

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. The permittee shall demonstrate compliance with this condition by Specific Condition # 13. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy |
|------------------|-------|-----|
| PM <sub>10</sub> | 0.1   | 0.5 |
| VOC              | 2.3   | 2.9 |

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 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant    | lb/hr | tpy  |
|--------------|-------|------|
| PM           | 0.10  | 0.42 |
| Formaldehyde | 0.02  | 0.09 |
| Methanol     | 1.59  | 2.04 |
| Phenol       | 0.63  | 0.82 |

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13. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Conditions # 7 and # 31. [§18.501 of Regulation 18 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.

The uncontrolled emissions from SN-13 fulfill the applicability criteria of the Compliance Assurance Monitoring (CAM) Rule (40 Code of Federal Regulations (CFR) Part (§) 64). Accordingly, the (CAM) Plan for the facility is provided in Appendix D. Per §64.2(a), the aforementioned source is regulated under the CAM Rule because it meets the following criteria: (1) the unit is subject to emission limitations for PM<sub>10</sub>, (2) the source is equipped with a control device (i.e., baghouse, filter), and (3) the unit has potential pre-control emissions of PM<sub>10</sub> that exceed the applicable major source threshold (i.e., 100 tons per year). In accordance with §64.3, Flakeboard America, LLC has developed a CAM Plan for this source. The Plan establishes the operating parameters that will be monitored in order to demonstrate compliance with the PM<sub>10</sub> emission limit at this source.

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. The permittee shall demonstrate compliance with this condition by Specific Condition # 16. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy |
|------------------|-------|-----|
| PM <sub>10</sub> | 0.5   | 2.1 |
| VOC              | 0.5   | 0.8 |

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 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant    | lb/hr | tpy  |
|--------------|-------|------|
| PM           | 0.50  | 2.10 |
| Acetone      | 0.07  | 0.11 |
| Formaldehyde | 0.04  | 0.05 |

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|          |      |      |
|----------|------|------|
| Methanol | 0.15 | 0.23 |
| Phenol   | 0.28 | 0.45 |

16. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Conditions # 7 and # 31. [§18.501 of Regulation 18 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. In order to meet BACT standards for PM emissions, Flakeboard re-routed cyclone SN-15 to an existing pneumatic fabric filter (SN-14).

The uncontrolled emissions from SN-14 fulfill the applicability criteria of the Compliance Assurance Monitoring (CAM) Rule (40 Code of Federal Regulations (CFR) Part (§) 64). Accordingly, the (CAM) Plan for the facility is provided in Appendix D. Per §64.2(a), the aforementioned source is regulated under the CAM Rule because it meets the following criteria: (1) the unit is subject to emission limitations for PM<sub>10</sub>, (2) the source is equipped with a control device (i.e., baghouse, filter), and (3) the unit has potential pre-control emissions of PM<sub>10</sub> that exceed the applicable major source threshold (i.e., 100 tons per year). In accordance with §64.3, Flakeboard America, LLC has developed a CAM Plan for this source. The Plan establishes the operating parameters that will be monitored in order to demonstrate compliance with the PM<sub>10</sub> emission limit at this source.

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. The permittee shall demonstrate compliance with this condition by Specific Condition # 19. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy |
|------------------|-------|-----|
| PM <sub>10</sub> | 0.1   | 0.2 |

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 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy  |
|-----------|-------|------|
| PM        | 0.03  | 0.11 |

19. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Conditions # 7 and # 31. [§18.501 of Regulation 18 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.

The uncontrolled emissions from SN-16 fulfill the applicability criteria of the Compliance Assurance Monitoring (CAM) Rule (40 Code of Federal Regulations (CFR) Part (§) 64). Accordingly, the (CAM) Plan for the facility is provided in Appendix D. Per §64.2(a), the aforementioned source is regulated under the CAM Rule because it meets the following criteria: (1) the unit is subject to emission limitations for PM<sub>10</sub>, (2) the source is equipped with a control device (i.e., baghouse, filter), and (3) the unit has potential pre-control emissions of PM<sub>10</sub> that exceed the applicable major source threshold (i.e., 100 tons per year). In accordance with §64.3, Flakeboard America, LLC has developed a CAM Plan for this source. The Plan establishes the operating parameters that will be monitored in order to demonstrate compliance with the PM<sub>10</sub> emission limit at this source.

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. The permittee shall demonstrate compliance with this condition by Specific Condition # 22. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy |
|------------------|-------|-----|
| PM <sub>10</sub> | 0.1   | 0.5 |

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 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy  |
|-----------|-------|------|
| PM        | 0.10  | 0.42 |

22. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Conditions # 7 and # 31. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-19  
Raw Material Storage

Source Description

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

Specific Conditions

23. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition # 25. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy |
|------------------|-------|-----|
| PM <sub>10</sub> | 0.1   | 0.1 |

24. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition # 25. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy  |
|-----------|-------|------|
| PM        | 0.01  | 0.04 |

25. 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]

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SN-22 and SN-22a  
 Line 1 Reject and Former Vacuum – Pneumatic Fabric Filter

Source Description

These two baghouses control particulate emissions from Line 1.

The uncontrolled emissions from SN-22 and SN-22a fulfill the applicability criteria of the Compliance Assurance Monitoring (CAM) Rule (40 Code of Federal Regulations (CFR) Part (§) 64). Accordingly, the (CAM) Plan for the facility is provided in Appendix D. Per §64.2(a), the aforementioned sources are regulated under the CAM Rule because they meet the following criteria: (1) each unit is subject to emission limitations for PM<sub>10</sub>, (2) each source is equipped with a control device (i.e., baghouse, filter), and (3) each unit has potential pre-control emissions of PM<sub>10</sub> that exceed the applicable major source threshold (i.e., 100 tons per year). In accordance with §64.3, Flakeboard America, LLC has developed a CAM Plan for these sources. The Plan establishes the operating parameters that will be monitored in order to demonstrate compliance with the PM<sub>10</sub> emission limit at each source.

Specific Conditions

26. 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. The permittee shall demonstrate compliance with this condition by Specific Condition # 28. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| SN  | Pollutant        | lb/hr | tpy |
|-----|------------------|-------|-----|
| 22  | PM <sub>10</sub> | 0.7   | 2.2 |
|     | VOC              | 0.5   | 1.0 |
| 22a | PM <sub>10</sub> | 0.4   | 1.5 |
|     | VOC              | *     | *   |

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

27. 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 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

|    | Pollutant | lb/hr | tpy  |
|----|-----------|-------|------|
| 22 | PM        | 0.62  | 2.19 |

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|     |              |      |      |
|-----|--------------|------|------|
|     | Formaldehyde | 0.23 | 0.53 |
|     | Methanol     | 0.18 | 0.41 |
| 22a | PM           | 0.33 | 1.45 |
|     | Formaldehyde | *    | *    |
|     | Methanol     | *    | *    |

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

28. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Conditions # 7 and # 31. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-26  
 Line 2 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

29. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition # 32 and Plantwide Conditions # 8 and # 9. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr* | tpy*  |
|------------------|--------|-------|
| PM <sub>10</sub> | 17.3   | 30.3  |
| SO <sub>2</sub>  | 2.0    | 5.6   |
| VOC              | 26.7   | 71.0  |
| CO               | 85.4   | 213.3 |
| NO <sub>x</sub>  | 56.9   | 136.8 |

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

30. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition # 32. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant    | lb/hr* | tpy* |
|--------------|--------|------|
| PM           | 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-01.

31. Visible emissions from this source shall not exceed 10% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition # 7. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
32. Natural gas shall be the only fuel used in the Line 2 Dryer burner. [§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]
33. 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]
34. The permittee shall test one RTO from SN-01 or SN-26 within 180 days of issuance of permit 0688-AOP-R5 and every five years afterward for PM<sub>10</sub>, NO<sub>x</sub>, CO, and VOC emissions using EPA Reference Methods 5, 7E, 10, and 25A respectively, and for opacity using EPA Reference Method #9. These tests shall be performed simultaneously. While performing the tests, the dryer shall be operating at least 90% of the maximum throughput rate. If testing is conducted at a rate lower than 90%, the facility shall be limited to an operating rate of 110% of the tested rate until compliance at a higher rate is demonstrated. Testing shall be conducted in accordance with Plantwide Condition # 3. [Pursuant to §19.702 of Regulation #19, §19.901 et seq. of Regulation #19, and 40 CFR Part 52, Subpart E]
35. The permittee shall test one RTO from SN-01 or SN-26 within 180 days of issuance of permit 0688-AOP-R5 for Formaldehyde emissions using EPA Test Method #18 or any applicable test method listed in 40 CFR 63, Subpart DDDD. These tests shall be performed simultaneously. While performing the tests, the dryer shall be operating at least 90% of the maximum throughput rate. If testing is conducted at a rate lower than 90%, the facility shall be limited to an operating rate of 110% of the tested rate until compliance at a higher rate is demonstrated. Testing shall be conducted in accordance with Plantwide Condition # 3. [Pursuant to §19.702 of Regulation #19, §19.901 et seq. of Regulation #19, and 40 CFR Part 52, Subpart E]

SN-27  
Line 2 Reject Cyclones – Pneumatic Fabric Filter

Source Description

This baghouse controls particulate emissions from Line 2.

The uncontrolled emissions from SN-27 fulfill the applicability criteria of the Compliance Assurance Monitoring (CAM) Rule (40 Code of Federal Regulations (CFR) Part (§) 64). Accordingly, the (CAM) Plan for the facility is provided in Appendix D. Per §64.2(a), the aforementioned source is regulated under the CAM Rule because it meets the following criteria: (1) the unit is subject to emission limitations for PM<sub>10</sub>, (2) the source is equipped with a control device (i.e., baghouse, filter), and (3) the unit has potential pre-control emissions of PM<sub>10</sub> that exceed the applicable major source threshold (i.e., 100 tons per year). In accordance with §64.3, Flakeboard America, LLC has developed a CAM Plan for this source. The Plan establishes the operating parameters that will be monitored in order to demonstrate compliance with the PM<sub>10</sub> emission limit at this source.

Specific Conditions

36. 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. The permittee shall demonstrate compliance with this condition by Specific Condition # 38. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy |
|------------------|-------|-----|
| PM <sub>10</sub> | 0.1   | 0.3 |
| VOC              | 0.5   | 1.5 |

37. 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 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant    | lb/hr | tpy  |
|--------------|-------|------|
| PM           | 0.05  | 0.21 |
| Formaldehyde | 0.26  | 0.82 |
| Methanol     | 0.20  | 0.64 |



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38. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Conditions # 7 and # 31. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-28  
Line 2 Former Vacuum – Pneumatic Fabric Filter

Source Description

This baghouse controls particulate emissions from Line 2.

The uncontrolled emissions from SN-28 fulfill the applicability criteria of the Compliance Assurance Monitoring (CAM) Rule (40 Code of Federal Regulations (CFR) Part (§) 64). Accordingly, the (CAM) Plan for the facility is provided in Appendix D. Per §64.2(a), the aforementioned source is regulated under the CAM Rule because it meets the following criteria: (1) the unit is subject to emission limitations for PM<sub>10</sub>, (2) the source is equipped with a control device (i.e., baghouse, filter), and (3) the unit has potential pre-control emissions of PM<sub>10</sub> that exceed the applicable major source threshold (i.e., 100 tons per year). In accordance with §64.3, Flakeboard America, LLC has developed a CAM Plan for this source. The Plan establishes the operating parameters that will be monitored in order to demonstrate compliance with the PM<sub>10</sub> emission limit at this source.

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. The permittee shall demonstrate compliance with this condition by Specific Condition # 41. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy |
|------------------|-------|-----|
| PM <sub>10</sub> | 0.1   | 0.3 |
| 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 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant    | lb/hr | tpy  |
|--------------|-------|------|
| PM           | 0.05  | 0.21 |
| Formaldehyde | 0.26  | 0.82 |
| Methanol     | 0.20  | 0.64 |

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41. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Conditions # 7 and # 31. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-29  
Line 2 Pneumatic Fiber Transport System – Pneumatic Fabric Filter (2)

Source Description

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

The uncontrolled emissions from SN-29 fulfill the applicability criteria of the Compliance Assurance Monitoring (CAM) Rule (40 Code of Federal Regulations (CFR) Part (§) 64). Accordingly, the (CAM) Plan for the facility is provided in Appendix D. Per §64.2(a), the aforementioned source is regulated under the CAM Rule because it meets the following criteria: (1) the unit is subject to emission limitations for PM<sub>10</sub>, (2) the source is equipped with a control device (i.e., baghouse, filter), and (3) the unit has potential pre-control emissions of PM<sub>10</sub> that exceed the applicable major source threshold (i.e., 100 tons per year). In accordance with §64.3, Flakeboard America, LLC has developed a CAM Plan for this source. The Plan establishes the operating parameters that will be monitored in order to demonstrate compliance with the PM<sub>10</sub> emission limit at this source.

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. The permittee shall demonstrate compliance with this condition by Specific Condition # 44. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy  |
|------------------|-------|------|
| PM <sub>10</sub> | 0.1   | 0.5  |
| VOC              | 3.1   | 11.9 |

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 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant    | lb/hr | tpy  |
|--------------|-------|------|
| PM           | 0.10  | 0.42 |
| Acetone      | 0.07  | 0.19 |
| Acetaldehyde | 0.07  | 0.20 |
| Formaldehyde | 0.61  | 1.92 |

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|          |      |      |
|----------|------|------|
| Methanol | 0.44 | 1.38 |
|----------|------|------|

44. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Conditions # 7 and # 31. [§18.501 of Regulation 18 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

45. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition # 48. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy  |
|------------------|-------|------|
| PM <sub>10</sub> | 0.6   | 2.7  |
| SO <sub>2</sub>  | 0.1   | 0.5  |
| VOC              | 0.5   | 2.2  |
| CO               | 3.2   | 14.1 |
| NO <sub>x</sub>  | 3.2   | 14.1 |

46. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition # 48. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy  |
|-----------|-------|------|
| PM        | 0.59  | 2.59 |

47. 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]
48. The permittee shall not combust more than 701 MMft<sup>3</sup> of natural gas at this source per consecutive twelve month period. Compliance shall be demonstrated through compliance with Specific Condition # 49. [§19.705 of Regulation 19, §18.1004 of

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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]

### **NSPS Requirements**

49. The permittee shall comply with all applicable regulations under 40 CFR Part 60, Subpart Dc (Appendix A). 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]

SN-32  
Reclaim Silo Baghouse

Source Description

Emissions from the cut-up saw are controlled by this baghouse.

The uncontrolled emissions from SN-32 fulfill the applicability criteria of the Compliance Assurance Monitoring (CAM) Rule (40 Code of Federal Regulations (CFR) Part (§) 64). Accordingly, the (CAM) Plan for the facility is provided in Appendix D. Per §64.2(a), the aforementioned source is regulated under the CAM Rule because it meets the following criteria: (1) the unit is subject to emission limitations for PM<sub>10</sub>, (2) the source is equipped with a control device (i.e., baghouse, filter), and (3) the unit has potential pre-control emissions of PM<sub>10</sub> that exceed the applicable major source threshold (i.e., 100 tons per year). In accordance with §64.3, Flakeboard America, LLC has developed a CAM Plan for this source. The Plan establishes the operating parameters that will be monitored in order to demonstrate compliance with the PM<sub>10</sub> emission limit at this source.

Specific Conditions

50. 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. The permittee shall demonstrate compliance with this condition by Specific Condition # 52. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy |
|------------------|-------|-----|
| PM <sub>10</sub> | 0.1   | 0.5 |

51. 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 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy  |
|-----------|-------|------|
| PM        | 0.09  | 0.40 |

52. Visible emissions from this source shall not exceed 5% opacity. Compliance shall be demonstrated through compliance with Plantwide Conditions # 7 and # 31. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]



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SN-33  
Cooling Towers

Source Description

The facility utilizes four cooling towers, each rated at 600 gpm. The cooling towers are seldom run during the winter months, and all four operate at once only during the summer months.

Specific Conditions

53. The permittee shall not exceed the emission rates set forth in the following table. Emissions from these sources have been calculated based on the maximum capacity of each unit. No further compliance demonstration is necessary. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

| Pollutant        | lb/hr | tpy  |
|------------------|-------|------|
| PM <sub>10</sub> | 2.8   | 12.1 |

54. The permittee shall not exceed the emission rates set forth in the following table. Emissions from these sources have been calculated based on the maximum capacity of each unit. No further compliance demonstration is necessary. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy   |
|-----------|-------|-------|
| PM        | 2.74  | 12.01 |

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

Flakeboard America, LLC will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

## SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms; and
  - d. Utilities for sampling and testing equipment.
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee 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 extend the stacks associated with SN-01 and SN-26 to 60 feet above the ground within 180 days of issuance of permit 0688-AOP-R5. [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]
12. The permittee shall test SN-01, SN-04, SN-09, and SN-29 for formaldehyde within 180 days of issuance of permit 0688-AOP-R5. The permittee shall use EPA Test Method 18, or any applicable test method listed in 40 CFR 63, Subpart DDDD, to test for formaldehyde. The results of these tests shall be submitted to the Department at the address listed in General Provision # 7. [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]

### **NESHAP Requirements**

13. The permittee shall comply with all applicable requirements for 40 CFR 63, Subpart DDDDD no later than September 13, 2007. [§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDDD §63.7495(b)]
14. The permittee shall comply with the initial notification requirements of §63.9(b). [§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDDD §63.7506(b)]

15. The permittee shall comply with the compliance options, operating requirements, and work practice requirements for 40 CFR 63, Subpart DDDD no later than October 1, 2008. [§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2233(b)]
16. The permittee shall comply with the compliance options as outlined in 40 CFR 63.2240. These requirements include, but are not limited to, the following:
  - a. For production-based compliance options, the permittee must meet the production-based total HAP compliance options in Table 1A to this subpart and the applicable operating requirements in Table 2 to this subpart. The permittee may not use an add-on control system or wet control device to meet the production-based compliance options; or
  - b. For add-on control systems compliance options, the permittee must use an emissions control system and demonstrate that the resulting emissions meet the compliance options and operating requirements in Tables 1B and 2 to Subpart DDDD. If the permittee owns or operates a reconstituted wood product press, and chooses to comply with one of the concentration-based compliance options for a control system outlet (presented as option numbers 2, 4, and 6 in Table 1B to this subpart), the permittee must have a capture device that either meets the definition of wood products enclosure in §63.2292 or achieves a capture efficiency of greater than or equal to 95 percent; or
  - c. For emissions averaging compliance option, the permittee must demonstrate that emissions included in the emissions average meet the compliance options and operating requirements, using the procedures outlined in 40 CFR 63.2240(c)(1) through (c)(3).

[§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2240(a) through (c)]

17. The permittee shall comply with all applicable work practices requirements in Table 3 of Subpart DDDD. [§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2241(a)]
18. The permittee shall comply with the general compliance requirements as outline in 40 CFR 63.2250. The general compliance requirements include, but are not limited to, the following:
  - a. The permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in this subpart at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control

device maintenance exemption specified in §63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.

- b. The permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).
- c. The permittee must develop a written SSMP according to the provisions in §63.6(e)(3).

[§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2250(a) through (c)]

19. The permittee shall comply with the routine control device maintenance exemption as outlined in 40 CFR 63.2251. These requirements include, but are not limited to, the following:
- a. The permittee may request a routine control device maintenance exemption from the EPA Administrator for routine maintenance events such as control device bakeouts, washouts, media replacement, and replacement of corroded parts. The request must justify the need for the routine maintenance on the control device and the time required to accomplish the maintenance activities, describe the maintenance activities and the frequency of the maintenance activities, explain why the maintenance cannot be accomplished during process shutdowns, describe how the permittee plans to make reasonable efforts to minimize emissions during the maintenance, and provide any other documentation required by the EPA Administrator.

[§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2251(a)]

20. The permittee shall comply with the initial compliance requirements as outlined in 40 CFR 63.2260. These requirements include, but are not limited to, the following:
- a. To demonstrate initial compliance with the compliance options and operating requirements, the permittee must conduct performance tests and establish each site-specific operating requirement in Table 2 of Subpart DDDD according to the requirements in §63.2262 and Table 4 Subpart DDDD. Combustion units that accept process exhausts into the flame zone are exempt from the initial performance testing and operating requirements for thermal oxidizers.

- b. The permittee must demonstrate initial compliance with each compliance option, operating requirement, and work practice requirement that applies to the facility according to Tables 5 and 6 to this subpart and according to §63.2260 through §63.2269 of this subpart.
- c. The permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in §63.2280(d).

[§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2260(a) through (c)]

- 21. The permittee shall conduct performance tests upon initial startup or no later than 180 calendar days after the compliance date that is specified for each source in §63.2233 and according to §63.7(a)(2), whichever is later. [§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2261(a)]
- 22. The permittee shall conduct initial compliance demonstrations that do not require performance tests upon initial startup or no later than 30 calendar days after the compliance date that is specified for each source in §63.2233, whichever is later. [§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2261(b)]
- 23. The permittee shall conduct performance tests and establish operating requirements as outlined in 40 CFR 63.2262. These requirements include, but are not limited to, the following:
  - a. The permittee must conduct each performance test according to the requirements in §63.7(e)(1), the requirements in paragraphs (b) through (o) of §63.2262, and according to the methods specified in Table 4 Subpart DDDD.

[§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2262(a)]

- 24. The permittee must either use a wood products enclosure as defined in §63.2292 or measure the capture efficiency of the capture device for the press or board cooler using Methods 204 and 204A through 204F of 40 CFR part 51, appendix M (as appropriate), or using the alternative tracer gas method contained in appendix A of Subpart DDDD. The permittee must submit documentation that the wood products enclosure meets the press enclosure design criteria in §63.2292 or the results of the capture efficiency verification with the Notification of Compliance Status. [§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2267]

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25. The permittee shall comply with all monitoring installation, operation, and maintenance requirements of 40 CFR 63.2269. These requirements include, but are not limited to, the following:
- a. The permittee must install, operate, and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (a)(1) through (3) of §63.2269.
  - b. For each temperature monitoring device, the permittee must meet the requirements in paragraphs (a) and (b)(1) through (6) of §63.2269.
  - c. Each CEMS must be installed, operated, and maintained according to paragraphs (d)(1) through (4) of §63.2269.

[§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2269(a),(b), and (d)]

26. The permittee shall comply with all continuous compliance requirements of 40 CFR 63.2270 and 40 CFR 63.2271. These requirements include, but are not limited to, the following:
- a. The permittee must monitor and collect data according to §63.2270.
  - b. The permittee must demonstrate continuous compliance with the all applicable compliance options, operating requirements, and work practice requirements in §63.2240 and §63.2241 according to the methods specified in Tables 7 and 8 to Subpart DDDD.
  - c. The permittee must report each instance in which the permittee did not meet each compliance option, operating requirement, and work practice requirement in Tables 7 and 8 of Subpart DDDD that applies to the permittee. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance specified in paragraphs (b)(1) through (3) of §63.2271. These instances are deviations from the compliance options, operating requirements, and work practice requirements in this subpart. These deviations must be reported according to the requirements in §63.2281.

[§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 40 CFR Part 63 Subpart DDDD §63.2270(a), and §63.2271(a) and (b)]

27. The permittee shall comply with all notifications requirements of 40 CFR 63.2280. These requirements include, but are not limited to, the following:
- a. The permittee must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9 (b) through (e), and (g) and (h) by the dates specified.



- b. The permittee must submit an Initial Notification no later than 120 calendar days after September 28, 2004, or after initial startup, whichever is later, as specified in §63.9(b)(2).
  - c. The permittee must submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in §63.7(b)(1).
  - d. The permittee is required to conduct a performance test, design evaluation, or other initial compliance demonstration as specified in Tables 4, 5, and 6 to Subpart DDDD, the permittee must submit a Notification of Compliance Status as specified in §63.9(h)(2)(ii).
  - e. For each initial compliance demonstration required in Table 5 or 6 to Subpart DDDD that does not include a performance test, the permittee must submit the Notification of Compliance Status before the close of business on the 30th calendar day following the completion of the initial compliance demonstration.
  - f. For each initial compliance demonstration required in Tables 5 and 6 to Subpart DDDD that includes a performance test conducted according to the requirements in Table 4 to Subpart DDDD, the permittee must submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to §63.10(d)(2).
  - g. The permittee must notify the EPA Administrator within 30 days before Flakeboard takes any of the actions specified in the following paragraphs:
    - i. Flakeboard modifies or replaces the control system for any process unit subject to the compliance options and operating requirements of Subpart DDDD;
    - ii. Flakeboard shuts down any process unit included in its Emissions Averaging Plan; or
    - iii. Flakeboard changes a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device.
- [§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2280(a) through (e) and (g)]
28. The permittee shall comply with the reporting requirements of 40 CFR 63.2281. These requirements include, but are not limited to, the following:

- a. The permittee must submit each report in Table 9 of Subpart DDDD that applies to Flakeboard.
- b. Unless the EPA Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report by the date in Table 9 of Subpart DDDD and as specified in paragraphs (b)(1) through (5) of §63.2281.
- c. The compliance report must contain the information in paragraphs (c)(1) through (8) of §63.2281.
- d. For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in Table 8 of Subpart DDDD that occurs at an affected source where the permittee is not using a CMS to comply with the compliance options, operating requirements, or work practice requirements in Subpart DDDD, the compliance report must contain the information in paragraphs (c)(1) through (6) of §63.2281 and in paragraphs (d)(1) and (2) of §63.2281. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
- e. For each deviation from a compliance option or operating requirement occurring at an affected source where the permittee is using a CMS to comply with the compliance options and operating requirements in Subpart DDDD, the permittee must include the information in paragraphs (c)(1) through (6) and paragraphs (e)(1) through (11) of §63.2281. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
- f. If the permittee complies with the emissions averaging compliance option in §63.2240(c), the permittee must include in its semiannual compliance report calculations based on operating data from the semiannual reporting period that demonstrate that actual mass removal equals or exceeds the required mass removal.
- g. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 9 to Subpart DDDD along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in Subpart DDDD, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any

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obligation the affected source may have to report deviations from permit requirements to the permitting authority.

[§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2281(a) through (g)]

29. The permittee shall comply with the record keeping requirements of 40 CFR 63.2282 and 40 CFR 63.2283. These requirements include, but are not limited to, the following:
- a. The permittee must keep the records listed in (a)(1) through (4) of §63.2282.
  - b. The permittee must keep the records required in Tables 7 and 8 of Subpart DDDD to show continuous compliance with each compliance option, operating requirement, and work practice requirement that apply to the permittee.
  - c. For each CEMS, the permittee must keep the records listed in (c)(1) through (4) of §63.2282.
  - d. If the permittee complies with the emissions averaging compliance option in §63.2240(c), the permittee must keep records of all information required to calculate emission debits and credits.
  - e. If the permittee operates a catalytic oxidizer, the permittee must keep records of annual catalyst activity checks and subsequent corrective actions.
  - f. Flakeboard's records must be in a form suitable and readily available for expeditious review as specified in §63.10(b)(1).
  - g. As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
  - h. The permittee must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The permittee can keep the records offsite for the remaining 3 years.
30. The permittee shall comply with any applicable general provisions as outlined in Table 10 of Subpart DDDD. [§19.304 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 63 Subpart DDDD §63.2290]

### **CAM Requirements**

31. The permittee shall comply with the CAM plan outlined in Appendix D for sources SN-04, SN-09, SN-12, SN-13, SN-14, SN-16, SN-22, SN-22a, SN-27, SN-28, SN-29, and SN-32, with an indicator range of less than five percent (5%) opacity. [§19.304, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 64]

### **Title VI Provisions**

32. 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.
33. 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.
34. 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.

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35. 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 Amotor vehicle as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term AMVAC 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.

36. 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".

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### SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated November 1, 2006.

| Description                               | Category           |
|---|--------------------|
| Resins Tanks                              | Group A, Number 13 |
| Gasoline Storage Tank (1,000 gallon)      | Group A, Number 13 |
| Refiner Reject Cyclone                    | Group A, Number 13 |
| Firewater Pumps                           | Group A, Number 13 |
| Roof & Wall general ventilation vents     | Group B, Number 3  |
| Woodwaste Loadout                         | Group A, Number 13 |
| Portable Air Compressor                   | Group A, Number 13 |
| Associated 300 gallon Diesel Storage Tank | Group A, Number 13 |

## SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective September 26, 2002]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample,

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measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]

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

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

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

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



permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

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

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

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]
14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director

- along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
  16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
  17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
  18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
  19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
  20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
    - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
    - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
    - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
    - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
  21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also

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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 26, §26.703(E)(3)]

- a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The compliance status;
  - c. Whether compliance was continuous or intermittent;
  - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit;
  - e. and Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
- 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. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]