

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1675-AR-4

IS ISSUED TO:

Anthony Forest Products Company, Laminating Plant
Cooper Drive and Mims Drive
El Dorado, AR 71730
Union County
CSN: 70-0068

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

Signed:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE: Anthony Forest Products Company,
Laminating Plant

CSN: 70-0068
PERMIT NUMBER: 1675-AR-4

FACILITY ADDRESS: Cooper Drive and Mims Drive
El Dorado, AR 71730

COUNTY: Union

CONTACT POSITION: Mark Young
TELEPHONE NUMBER: (870) 962-3291

REVIEWING ENGINEER: Paula Parker

UTM North-South (X): Zone 15 3698 km
UTM East-West (Y): Zone 15 406 km

Anthony Forest Products Company, Laminating Plant
Permit #: 1675-AR-4
CSN: 70-0068

SECTION II: INTRODUCTION

Summary

The Anthony Forest Products Company of El Dorado, Arkansas, requests a modification to their current permit to allow the installation of a new wood by-product transfer cyclone, SN-09. Emissions from the hogging process will be routed to this new source. Sawdust, sander dust, and shavings from the cutting and planing operations will then be conveyed to storage instead of being processed through the hammer hog.

Process Description

Raw materials used at this site are dimensioned pine lumber, laminating glue and glue additives. Lumber is brought into the plant through the main entrance from Cooper Drive or Mims Drive and unloaded in the raw materials storage building.

The first step in the assembly of the laminated beams is grading for beam lay up and measuring for moisture content. Boards are moved by forklift to the grading building where they are graded and cut to length. To ensure a quality product, boards must have a moisture content of 15 percent or less. Boards with moisture content greater than 15 percent are sent to the kiln for drying and then retested. Approximately 30 percent of the lumber is sent to the kiln before processing. Emissions from the kiln are designated SN-01 which has been determined to be insignificant.

The boards are then routed to the laminating building. Finger joints are cut in the ends. Glue is applied to the finger joints and boards are joined together end to end. The resulting boards are cut to desired length. The boards are conveyed from the finger joint station to the glue station. Here boards are glued to one another to produce a beam of the desired thickness and width. The beam is placed in a Raybond press to hold it together and cure it. Excess glue from the finger joining operation is allowed to drip onto paper sheeting, which is then rolled up and placed in waste containers. Excess glue from the beam laminating process is collected in a five-gallon bucket and allowed to solidify. Fugitive emissions from glueing operations are designated SN-04.

Once the glue has dried, the beam is run through a planer to produce a clean, smooth surface and it is then trimmed to length. Cuttings from the grading and laminating process are hogged to produce a marketable product and sold. Emissions from the hogging process are routed to the facility's cyclone system.

Sawdust, sander dust, and shavings from the cutting and planing operations are conveyed to

Anthony Forest Products Company, Laminating Plant
Permit #: 1675-AR-4
CSN: 70-0068

storage instead of being processed through the hammer hog. Emissions from the hogging process have been routed to this new source, a Wood By-Product Transfer Cyclone (SN-09). Fugitive particulate emissions from loadout operations and the hammer hog are designated SN-05.

After planing and trimming, the dimensioned and surfaced beams are transferred to the finish building where they are covered with protective water proof paper wrapping and marked with dimensions and destination. Finished beams are stored in the finish building, the grading building and outside in the area south of the lamination building.

Repair and maintenance of equipment and vehicles are provided in a shop building. Floors are cleaned up with dry floor sweep. Solids and floor clean up are transported to solid waste containers. Used oil is collected and returned to the dealer for recycling. Fuel for vehicles is stored in one diesel and one gasoline tank. The gasoline tank has been assigned vent designation SN-06; the diesel tank has been assigned vent SN-07. SN-07 has been designated insignificant according to item A-3 of the insignificant activities list in Regulation 19.

Regulations

This facility is subject to the Arkansas Air Pollution Control Code (Regulation 18) and the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19).

The following table is a summary of the facility's total emissions.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	33.2	93.2
PM ₁₀	33.2	93.2
VOC *	43.0	38.8
Ethylene Glycol	3.56	3.56
Formaldehyde	5.34	5.34
MIBK	1.51	1.51
Methanol	3.42	3.42
Phenol	5.61	5.61
Total HAP	19.44	19.44

* The VOC value includes all HAPs.

SECTION III: PERMIT HISTORY

Anthony Forest Products Company, Laminating Plant
Permit #: 1675-AR-4
CSN: 70-0068

- 1675-A First permit issued to this facility in 1996.
- 1675-AR-1 On November 18, 1997, a draft version of 1675-AR-1 was issued. This permit increased production and added a new glue formulation. Comments on this draft included a request that the permit be permitted as a Regulation #18 permit. A second draft was issued in May, 1998. No additional comments were submitted. On June 29, 1998, permit 1675-AR-1 was finalized.
- 1675-AR-2 Major modification that allowed an increase in production as well as allowed a new glue formulation to be used. Permit was final on May 21, 2000.
- 1675-AR-3 This permit modification covered a slight increase in particulate emissions due to the addition of a hog (SN-05), which processed trimmings that were previously disposed of offsite. A new glue was used at the facility in keeping with Specific Condition #8. The permit was made final on December 4, 2000.

SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
02	Wood By-Product Transfer Cyclone	PM ₁₀	9.3	40.6
03	Wood By-Product Transfer Cyclone (Special Products)	PM ₁₀	8.3	36.1
04	Glueing Operations	VOC	38.4	38.4
05	Loadout Operations	PM ₁₀	13.7	13.7
06	Gasoline Storage Tank	VOC	4.6	0.4
09	Wood By-Product Transfer Cyclone (Hogging Process)	PM ₁₀	1.9	2.8

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
02	Wood By-Product Transfer Cyclone	PM	9.3	40.6
03	Wood By-Product Transfer Cyclone (Special Products)	PM	8.3	36.1

Anthony Forest Products Company, Laminating Plant
Permit #: 1675-AR-4
CSN: 70-0068

SN	Description	Pollutant	lb/hr	tpy
04	Glueing Operations	Ethylene Glycol	3.56	3.56
		Formaldehyde	5.34	5.34
		MIBK	1.51	1.51
		Methanol	3.42	3.42
		Phenol	5.61	5.61
05	Loadout Operations	PM	13.7	13.7
09	Wood By-Product Transfer Cyclone (Hogging Process)	PM	1.9	2.8

3. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
02	20%	19.503
03	20%	19.503
05	20%	19.503
09	20%	19.503

4. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.
5. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.
6. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 54,750,000 board feet of product at the facility per consecutive 12 month period.

Anthony Forest Products Company, Laminating Plant
Permit #: 1675-AR-4
CSN: 70-0068

7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #6. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request.
8. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission factors set forth in the following table.

Pollutant	Emission Factor (lb pollutant/lb glue)
VOC	0.0280
Ethylene Glycol	0.0026
Formaldehyde	0.0039
MIBK	0.0011
Methanol	0.0025
Phenol	0.0041

9. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with Specific Condition #8. These records shall be kept on site, and shall be made available to Department personnel upon request.
10. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not operate the Wood By-Product Transfer Cyclone (SN-09) more than 8 hours per day and 2,920 hours per year.
11. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain daily records which demonstrate compliance with Specific Condition #10. These records shall be kept on site, and shall be made available to Department personnel upon request.

Anthony Forest Products Company, Laminating Plant
Permit #: 1675-AR-4
CSN: 70-0068

12. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 50,000 gallons of gasoline at the facility per consecutive 12 month period.

13. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #12. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request.

Anthony Forest Products Company, Laminating Plant
Permit #: 1675-AR-4
CSN: 70-0068

SECTION V: INSIGNIFICANT ACTIVITIES

The following types of activities or emissions are deemed insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated September 25, 1998.

Description	Category
SN-01 Dry Kiln (3 MMBTU/hr)	A-1
SN-07 Diesel Storage Tank	A-3

Anthony Forest Products Company, Laminating Plant
Permit #: 1675-AR-4
CSN: 70-0068

SECTION VI: GENERAL CONDITIONS

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.
2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, records must be kept for five years which will enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

Anthony Forest Products Company, Laminating Plant
Permit #: 1675-AR-4
CSN: 70-0068

6. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

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

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall be subject to enforcement action. The Department may forego enforcement

Anthony Forest Products Company, Laminating Plant
Permit #: 1675-AR-3
CSN: 70-0068

action for emissions exceeding any limits established by this permit provided the following requirements are met:

- a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and that all reasonable measures have been taken to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee shall submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, it need not be submitted again.
11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
- a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act
 - c. To inspect any monitoring equipment or monitoring method required in this permit
 - d. To sample any emission of pollutants
 - e. To perform an operation and maintenance inspection of the permitted source
12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued in reliance upon the statements and presentations made in the permit application.

The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus.

Anthony Forest Products Company, Laminating Plant
Permit #: 1675-AR-3
CSN: 70-0068

13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.