



DIVISION OF ENVIRONMENTAL QUALITY

DRAFT MINOR SOURCE AIR PERMIT

PERMIT NUMBER: 2227-AR-3

IS ISSUED TO:

Lignetics of AR and MO, LLC

4004 Blue Collar Lane

Mountain View, AR 72560

Stone County

AFIN: 69-00298

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

Signed:

Demetria Kimbrough
Deputy Director, Office of Air Quality
Division of Environmental Quality

Date

Lignetics of AR and MO, LLC
Permit #: 2227-AR-3
AFIN: 69-00298

Table of Contents

Section I: FACILITY INFORMATION.....	4
Section II: INTRODUCTION.....	5
Summary of Permit Activity.....	5
Process Description.....	5
Rules and Regulations.....	8
Total Allowable Emissions.....	8
Section III: PERMIT HISTORY	9
Section IV: EMISSION UNIT INFORMATION.....	10
Section V: INSIGNIFICANT ACTIVITIES	15
Section VI: GENERAL CONDITIONS	16

Lignetics of AR and MO, LLC

Permit #: 2227-AR-3

AFIN: 69-00298

List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	Arkansas DEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
HAP	Hazardous Air Pollutant
Hp	Horsepower
lb/hr	Pound Per Hour
NESHAP	National Emission Standards (for) Hazardous Air Pollutants
No.	Number
NO _x	Nitrogen Oxide
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate Matter Equal To Or Smaller Than Ten Microns
PM _{2.5}	Particulate Matter Equal To Or Smaller Than 2.5 Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Lignetics of AR and MO, LLC
Permit #: 2227-AR-3
AFIN: 69-00298

Section I: FACILITY INFORMATION

PERMITTEE:	Lignetics of AR and MO, LLC
AFIN:	69-00298
PERMIT NUMBER:	2227-AR-3
FACILITY ADDRESS:	4004 Blue Collar Lane Mountain View, AR 72560
MAILING ADDRESS:	4004 Blue Collar Lane Mountain View, AR 72560
COUNTY:	Stone County
CONTACT NAME:	Chase Hulbert
CONTACT POSITION:	Plant Manager
TELEPHONE NUMBER:	(707) 349-3740
REVIEWING ENGINEER:	AlexanderAlexander Sudibjo Sudibjo
UTM North South (Y):	Zone 15: 3969592.63 m
UTM East West (X):	Zone 15: 576254.3 m

Section II: INTRODUCTION

Summary of Permit Activity

Lignetics of AR and MO, LLC owns and operates a hardwood pellet manufacturing facility located at 4004 Blue Collar Lane Mountain View, Stone County, Arkansas 72560. This permit modification includes two de minimis changes: adding ductwork to connect cyclone 3 to cyclone 2 and installation of a new baghouse to control emissions from the Hammermill (SN-03) and Pellet Cooler (SN-04). Additionally, this modification also adds all missing pre-existing sources to the permit and separates the Chips & Chunks Operation from the Pellet Mill. The facility's permitted annual emissions are increasing by 40.4 tpy PM, 20.4 tpy PM₁₀, 0.2 tpy SO₂, and 12.4 tpy NO_x. The facility's permitted annual emissions are decreasing by 1.4 tpy VOC, 3.4 tpy CO, and 0.63 tpy total HAPs.

Process Description

The Lignetics of AR and MO, LLC (Lignetics) facility is an industrial complex located in Mountainview, AR. It consists of a Chips & Chunks facility located at 288 Industrial Drive and a Pellet Mill located at 4004 Blue Collar Lane. The NAICS codes for the primary activity is NAICS 321113-Sawmills and NAICS 321999-All Other Miscellaneous Wood Product Manufacturing for the secondary activity.

The Lignetics facility produces wood chips and chunks for smoking and grilling meat and vegetables and wood fuel pellets used for heating and barbecuing. Chips are smaller pieces of wood that are great for short, quick bursts of smoke. Chunks are fist-sized pieces of wood that are best for creating smoke for extended periods.

The normal operating schedule for the Chips & Chunks facility is 16 hours/day, 5 days/week and for the Pellet Mill is 24 hours/day, 5 days/week. The Pellet Mill has a maximum sustainable production rate of 6 oven dried tons (ODT) per hour and 52,560 ODT per year.

Chips & Chunks Operation

Logs are delivered to the facility where they are turned into chips or chunks in one of the following processes

Chips Manufacturing

A Disc Chipper (SN-10) is used to cut logs into chips. The chips are processed by a Screen (SN-11) to remove undersized material for transfer by totes to the dust pile. Green chips are transferred to a Rotary Drum Dryer (SN-02) with Natural Gas Burner (SN-02A) for drying. Once dried, the material passes through Cyclone 2 (SN-33) to separate the dried material from the air stream (product recovery). The dried material is then sent for Pellet Production.

Lignetics of AR and MO, LLC

Permit #: 2227-AR-3

AFIN: 69-00298

Dry chips are processed by a Screen (SN-12) to remove oversized material for transferring to scrap. The remaining dry chips are stored in Building C. Material collected by the cyclone is transferred to a Dry Hammermill with Cyclone (SN-08) that further breaks down the material, which is transferred to the dust pile. From storage, the chips are hand bagged using two packaging lines.

Chunks Manufacturing

Process line 1 uses a Circular Saw (SN-13) to cut the logs into discs. Residual products from the circular saw include log ends (butt ends) and the material removed by the cutting process itself (kerf). Discs from the circular saw are transferred by conveyor to a Feed Hog Wood Grinder (SN-14) for grinding. The butt ends from the circular saw are transferred into cages that are transferred to the ends pile. The kerf from the circular saw is transferred behind the building into a pile. Wood chunks from the feed hog wood grinder are transferred by conveyor to a Screen (SN-15) to remove the undersized pieces from the chunks. The chunks may be stored in the pre-dry building prior to processing by a Kiln (SN-35) with Natural Gas Burner (SN-07). The undersized material from the screen is transferred to the dust pile. The kiln dries the green wood chunks to increase the energy content of the material and provide a longer storage life. The drying process takes between 48 and 96 hours to complete. Kiln-dried wood is transferred by cages to storage in Building A.

Process line 2 uses a Circular Saw (SN-16) to cut the logs into discs. Discs are conveyed to a cage and transported to the feed hog wood grinder in Process Line 1 for grinding. The butt ends from the circular saw are transferred in cages to the ends pile and the kerf from the circular saw is transferred to the dust pile.

Process line 3 uses a Firewood Processor (SN-17) with a Firewood Processor Diesel Engine (SN-18) to cut the logs into discs. Discs from the firewood processor are conveyed to a cage and transported to the feed hog in Process Line 1 for grinding. The butt ends from the firewood processor are transferred in cages to the ends pile and the kerf from the firewood processor is transferred to the dust pile.

Packaging

Products from the Chips & Chunks facility are hand-bagged using two packaging lines for chips and one packaging line for chunks.

Fines

Butt ends from the ends pile are processed in a Horizontal Grinder (SN-19) to produce fines. Fines from the Chips & Chunks process are either used to make BBQ pellets, fuel the wood-fired burner at the Pellet Mill, or sold to another business.

Pellet Mill

Sawdust Drying

The Pellet Mill receives waste wood primarily in the form of sawdust from the Chunks and Chips facility and from outside sources. The material is stored in the covered Sawdust Storage Shed and also outside. Green infeed is transferred by front-end loader to the KD Infeed Hopper (collectively called SN-01).

Green wood is gravity-fed to a 3-Pass Dryer that is heated by a Wood-fired burner (SN-02A/B). Waste wood from the Pellet Mill and the Chunks and Chips facility dust piles fuels the burner. The fuel is loaded into a Fuel Silo and transferred by auger to a blower that feeds the burner. The 3-Pass Dryer reduces the moisture content of the green wood. Once dried, the material passes through Cyclone 1 to separate the dried material from the air stream (product recovery). The dried material is then sent for Pellet Production.

Pellet Production

Material from Cyclone 1 in Sawdust Drying is transferred by auger to a Hammermill (SN-03) for size reduction. KD wood from the KD Infeed Hopper is transferred by auger directly to the same hammermill. Reduced material from the hammermill is transferred by auger to Bucket Elevator 1 then to a Live Bottom Hopper equipped with screw feeders to discharge the material. If needed, material in the bucket elevator can be aborted to the designated abort area. Hopper material is transferred by augers to Pellet Mill 1 or Pellet Mill 2 to form the pellets. The pellets are transferred by drag conveyors and Bucket Elevator 2 to a Pellet Cooler (SN-04) where ambient air is pulled through the pellets for cooling. The pellets are then sent for Screening & Packaging (SN-05). Exhaust from the hammermill and the Pellet Cooler are sent to Cyclone 2 and Cyclone 3 in series, where the removed fines are transferred by auger to the Fuel Silo. Exhaust from Cyclone 3 will be ducted to a Baghouse to provide additional control.

Screening & Packaging

Pellets from Pellet Production are gravity-fed to a Cooler Screener 1 (SN-04) to remove undersized material. The pellets are transferred by gravity to Bucket Elevator 3 for delivery to Pellet Storage Bin 1 or Pellet Storage Bin 2. Pellets from Pellet Storage Bin 1 are transferred by auger to Cooler Screener 2 before being transferred by gravity to an Automated Bagging Machine for bagging. Pellets from Pellet Storage Bin 2 undergo manual bagging. The bags are stacked by a palletizing robot for shipment. Fines from Cooler Screener 1 are sent to Cyclone 2 for recovery of the fines that are transferred by auger to the fuel silo. Fines from Cooler Screener 2 and Pellet Bin 2 are transferred by ductwork to Cyclone 4 that exhausts within the building. Fines from Cyclone 4 empty into a wheelbarrow and are transferred to the Fuel Silo.

Lignetics of AR and MO, LLC
Permit #: 2227-AR-3
AFIN: 69-00298

Rules and Regulations

The following table contains the rules and regulations applicable to this permit.

Rules and Regulations
Arkansas Air Pollution Control Code, Rule 18, effective March 14, 2016
Rules of the Arkansas Plan of Implementation for Air Pollution Control, Rule 19, effective May 6, 2022

Total Allowable Emissions

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	31.7	105.7
PM ₁₀	16.3	55.0
PM _{2.5}	See Note*	
SO ₂	0.6	1.7
VOC	8.9	34.6
CO	8.8	35.6
NO _x	11.7	47.0
Total HAP	0.86	3.42

*PM_{2.5} limits are source specific, if required. Not all sources have PM_{2.5} limits.

Lignetics of AR and MO, LLC
Permit #: 2227-AR-3
AFIN: 69-00298

Section III: PERMIT HISTORY

Permit #2227-A was issued on August 8, 2011 to Sparkman Wood Pellet Company. The facility owns and operates a hardwood pellet manufacturing facility in Stone County. This permitting activity was necessary to issue the company its initial air permit.

Permit #2227-AR-1 was issued on October 1, 2015. With this permitting action, the facility increased throughput from 33,280 to 72,000 tons of sawdust per rolling 12 months. Total annual emission changes associated with this modification were: +0.2 tpy (tons per year) PM, +7.1 tpy VOC, and -0.06 tpy Total HAPs.

Permit #2227-AR-2 was issued on November 23, 2020. With this de minimis modification, the facility replaced the 12 MMBtu/hr wood-fired Webb burner with a 20 MMBtu/hr natural gas-fired Astraflame 15 burner and added a second line equipped with a 20 MMBtu/hr natural gas-fired Astraflame 15 burner (SN-07) and new hammermill (SN-08). The wood-fired Webb burner was kept on-site and only used when the Astraflame 15 burner was unable to operate. The facility's permitted annual emissions increased by 12.5 tpy PM, 4.2 tpy PM₁₀, 0.1 tpy SO₂, 13.8 tpy VOC, 7.4 tpy CO, 8.8 tpy NO_x, 0.03 tpy acrolein, and 0.81 tpy total HAPs.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table. [Rule 19.501 *et seq.* and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
Chips & Chunks Facility				
02	Rotary Drum Dryer	VOC	3.0	10.4
02A	Natural Gas Burner for Rotary Drum Dryer (20 MMBtu/hr)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	0.2	0.4
		CO	1.7	5.8
		NO _x	2.0	6.9
08	Hammermill	PM ₁₀	0.3	1.0
10	Disc Chipper	PM ₁₀	0.3	1.0
11	Chips Screen	PM ₁₀	0.1	0.1
12	Dry Chips Screen	PM ₁₀	0.1	0.1
13	Circular Saw with Conveyor	PM ₁₀	1.4	4.9
14	Feed Hog Wood Grinder with Conveyor	PM ₁₀	0.3	1.0
15	Chunks Screen	PM ₁₀	0.1	0.1
16	Circular Saw	PM ₁₀	1.4	4.9
17	Firewood Processor	PM ₁₀	1.4	4.9
18	Diesel Engine for Firewood Processor (46 HP)	PM ₁₀	0.1	0.4
		SO ₂	0.1	0.1
		VOC	0.2	0.4
		CO	0.3	1.1
		NO _x	1.5	5.0
19	Horizontal Grinder	PM ₁₀	0.3	1.0
20	Unpaved Road Travel for Chips & Chunks Facility	PM ₁₀	1.3	3.2
33	Product Recovery Cyclone	PM ₁₀	1.2	4.0
07	Natural Gas Burner for Kiln (210 MMBtu/hr)	PM ₁₀	0.1	0.3
		SO ₂	0.1	0.1
		VOC	1.5	6.3
		CO	0.9	2.9
		NO _x	1.0	3.5
35	Kiln	VOC	0.7	2.9
Pellet Mill				

SN	Description	Pollutant	lb/hr	tpy
01	Sawdust Storage Shed	PM ₁₀	0.1	0.1
02B	Wood-Fired Burner for Triple-Pass Drum Dryer (12 MMBtu/hr)	PM ₁₀	4.4	19.0
		SO ₂	0.3	1.4
		VOC	0.2	0.9
		CO	5.9	25.8
		NO _x	7.2	31.6
03	Hammermill with 2 Cyclones and a Baghouse	PM ₁₀	0.1	0.1
04	Pellet Cooler and Cooler Screen 1 with 2 Cyclones and a Baghouse	PM ₁₀	0.1	0.1
05	Finished Product (Pellets) Packaging, Storage, & Loading	This source is inside a building and does not exhaust into the atmosphere.		
09	Triple Pass Drum Dryer	VOC	3.1	13.3
21	Fuel Silo	PM ₁₀	0.1	0.1
22	Bucket Elevator 1	This source is fully enclosed.		
23	Live Bottom Hopper	PM ₁₀	0.1	0.1
24	Pellet Mill 1	These sources are inside a building and do not exhaust into the atmosphere.		
25	Pellet Mill 2			
26	Bucket Elevator 2	PM ₁₀	0.1	0.1
27	Bucket Elevator 3	This source is inside a building and does not exhaust into the atmosphere.		
28	Pellet Bins 1	PM ₁₀	0.1	0.1
29	Pellet Bins 2			
30	Cooler Screen 2 with Cyclone	PM ₁₀	0.1	0.1
31	Sawdust Stockpile Fugitive	PM ₁₀	0.1	0.1
32	Unpaved Road Travel for Pellet Mill	PM ₁₀	1.2	2.6
34	Product Recovery Cyclone	PM ₁₀	1.2	5.0

2. The permittee shall not exceed the emission rates set forth in the following table. [Rule 18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
Chips & Chunks Facility				
02	Rotary Drum Dryer	Total HAPs	0.23	0.79
02A	Natural Gas Burner for Rotary Drum Dryer (20 MMBtu/hr)	PM	0.2	0.6
		Total HAPs	0.01	0.01
08	Hammermill	PM	0.6	1.9
10	Disc Chipper	PM	0.6	1.9

Lignetics of AR and MO, LLC

Permit #: 2227-AR-3

AFIN: 69-00298

SN	Description	Pollutant	lb/hr	tpy
11	Chips Screen	PM	0.1	0.2
12	Dry Chips Screen	PM	0.1	0.2
13	Circular Saw with Conveyor	PM	2.8	9.8
14	Feed Hog Wood Grinder with Conveyor	PM	0.6	1.9
15	Chunks Screen	PM	0.1	0.2
16	Circular Saw	PM	2.8	9.8
17	Firewood Processor	PM	2.8	9.8
18	Diesel Engine for Firewood Processor (46 HP)	PM Total HAPs	0.1 0.01	0.4 0.01
19	Horizontal Grinder	PM	0.6	1.9
20	Unpaved Road Travel for Chips & Chunks Facility	PM	4.4	11.3
33	Product Recovery Cyclone	PM	3.1	10.9
07	Natural Gas Burner for Kiln (10 MMBtu/hr)	PM ₁₀ Total HAPs	0.1 0.01	0.3 0.01
35	Kiln	Total HAPs	0.18	0.77
Pellet Mill				
01	Sawdust Storage Shed	PM	0.1	0.1
02B	Wood-Fired Burner for Triple-Pass Drum Dryer (12 MMBtu/hr)	PM Total HAPs	4.8 0.19	21.1 0.82
03	Hammermill with 2 Cyclones and a Baghouse	PM	0.1	0.1
04	Pellet Cooler and Cooler Screen 1 with 2 Cyclones and a Baghouse	PM	0.1	0.1
05	Finished Product (Pellets) Packaging, Storage, & Loading	This source is inside a building and does not exhaust into the atmosphere.		
09	Triple Pass Drum Dryer	Total HAPs	0.23	1.01
21	Fuel Silo	PM	0.1	0.1
22	Bucket Elevator 1	This source is fully enclosed.		
23	Live Bottom Hopper	PM	0.1	0.1
24	Pellet Mill 1	These sources are inside a building and do not exhaust into the atmosphere.		
25	Pellet Mill 2			
26	Bucket Elevator 2	PM	0.1	0.1
27	Bucket Elevator 3	This source is inside a building and does not exhaust into the atmosphere.		
28	Pellet Bins 1	PM	0.1	0.1
29	Pellet Bins 2			
30	Cooler Screen 2 with Cyclone	PM	0.1	0.1

SN	Description	Pollutant	lb/hr	tpy
31	Sawdust Stockpile Fugitive	PM	0.1	0.1
32	Unpaved Road Travel for Pellet Mill	PM ₁₀	3.9	9.0
34	Product Recovery Cyclone	PM ₁₀	3.1	13.6

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

SN	Limit	Regulatory Citation
01, 03, 04, 08, 10, 11, 12, 13, 14, 15, 16, 17, 19, 21, 23, 26, 28, 29, 30, 33, 34	20%	Rule 19.503
02A, 02B, 05, 07, 18	5%	Rule 18.501

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation 18, if the emission of the air contaminant constitutes air pollution within the meaning of Ark. Code Ann. § 8-4-303. [Rule 18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Rule 18.901 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. The permittee shall not receive more than 72,000 tons of sawdust at the facility per rolling 12 month period. [Rule 19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
7. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #6. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Department personnel upon request. [Rule 19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall not operate the Chips & Chunks Facility more than 7000 hours per rolling 12 month period. [Rule 19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
9. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #8. The permittee shall update these records by the fifteenth day of the month

following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Division of Environmental Quality personnel upon request. [Rule 19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

10. The permittee shall conduct an initial test on SN-02 and SN-02A combined for VOC using Method 25A. The test shall take place within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up and in accordance with General Condition #7. Testing shall be conducted with the source operating at least at 90% of its permitted capacity of 0.84 MBF per hour. Emission testing results shall be extrapolated to correlate with 100% of the permitted capacity to demonstrate compliance. Failure to test within this range shall limit the permittee to operating within 10% above the tested rate. The permittee shall measure the operation rate during the test and if testing is conducted below 90% of the permitted capacity, records shall be maintained at all times to demonstrate that the source does not exceed operation at 10% above the tested rate. [Rule 19.702 and/or Rule 18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Test Location	Pollutant	Test Method	Combined Maximum Hourly Emission Rate (lb/hr)
SN-02 & 02A	VOC	Method 25A	3.2

11. The permittee shall conduct an initial test on SN-07 for VOC using Method 25A. The test shall take place within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up and in accordance with General Condition #7. Testing shall be conducted with the source operating at least at 90% of its permitted capacity of 10 MMBtu/hr. Emission testing results shall be extrapolated to correlate with 100% of the permitted capacity to demonstrate compliance. Failure to test within this range shall limit the permittee to operating within 10% above the tested rate. The permittee shall measure the operation rate during the test and if testing is conducted below 90% of the permitted capacity, records shall be maintained at all times to demonstrate that the source does not exceed operation at 10% above the tested rate. [Rule 19.702 and/or Rule 18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Test Location	Pollutant	Test Method	Maximum Hourly Emission Rate (lb/hr)
SN-07	VOC	Method 25A	1.5

Lignetics of AR and MO, LLC

Permit #: 2227-AR-3

AFIN: 69-00298

Section V: INSIGNIFICANT ACTIVITIES

The Division of Environmental Quality deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Rule 18 and Rule 19 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated July 15, 2020. [Rule 19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
None identified.	

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Rule 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 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 Rule 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Rule 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the rules promulgated under the Act. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
3. The permittee shall notify the Division of Environmental Quality in writing within thirty (30) days after each of the following events: commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Rule 19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Rule 19.410(B) and/or Rule 18.309(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee must keep records for five years to enable the Division of Environmental Quality to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Division of Environmental Quality may use the records, at the discretion of the Division of Environmental Quality, to determine compliance with the conditions of the permit. [Rule 19.705 and/or Rule 18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Division of Environmental Quality electronically using <https://eportal.adeq.state.ar.us> or mail them to the address below. [Rule 19.705 and/or Rule 18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Division of Environmental Quality
Office of Air Quality

Lignetics of AR and MO, LLC

Permit #: 2227-AR-3

AFIN: 69-00298

ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Division of Environmental Quality. The permittee must notify the Division of Environmental Quality of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Division of Environmental Quality within sixty (60) calendar days after the completion of testing. [Rule 19.702 and/or Rule 18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall provide: [Rule 19.702 and/or Rule 18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Rule 19.303 and/or Rule 18.1104 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Division of Environmental Quality may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Rule 19.601 and/or Rule 18.1101 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Division of Environmental Quality that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, overnight delivery, or online at <https://portal.adeq.state.ar.us>) to the Division of Environmental Quality by the

- end of the next business day after the occurrence or the discovery of the occurrence.
- c. The permittee must submit to the Division of Environmental Quality, 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, the information need not be submitted again.
11. The permittee shall allow representatives of the Division of Environmental Quality upon the presentation of credentials: [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
- b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
- c. To inspect any monitoring equipment or monitoring method required in this permit;
- d. To sample any emission of pollutants; and
- e. To perform an operation and maintenance inspection of the permitted source.
12. The Division of Environmental Quality issued this permit in reliance upon the statements and presentations made in the permit application. The Division of Environmental Quality has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
13. The Division of Environmental Quality may revoke or modify this permit when, in the judgment of the Division of Environmental Quality, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the rules promulgated the Arkansas Water and Air Pollution Control Act. [Rule 19.410(A) and/or Rule 18.309(A) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Division of Environmental Quality 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 Division of Environmental Quality denies the request to transfer within thirty (30) days of the receipt of the

disclosure statement. The Division of Environmental Quality may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Rule 19.407(B) and/or Rule 18.307(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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

[Rule 18.314(A) and/or Rule 19.416(A), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Division of Environmental Quality approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:
 - a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;

- d. The request contains such information necessary for the Division of Environmental Quality to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
- e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
- f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Rule 18.314(B) and/or Rule 19.416(B), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

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

[Rule 18.314(C) and/or Rule 19.416(C), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

22. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [Rule 18.1001, Rule 19.701, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]