



DIVISION OF ENVIRONMENTAL QUALITY

DRAFT MINOR SOURCE AIR PERMIT

PERMIT NUMBER: 2361-AR-2

IS ISSUED TO:

EnviraPAC Monticello, LLC
346 Firing Range Road
Monticello, AR 71655
Drew County
AFIN: 22-00392

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:

David Witherow, P.E.
Associate Director, Office of Air Quality
Division of Environmental Quality

Date

EnviraPAC Monticello, LLC
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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

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Section I: FACILITY INFORMATION

PERMITTEE: EnviraPAC Monticello, LLC

AFIN: 22-00392

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FACILITY ADDRESS: 346 Firing Range Road
Monticello, AR 71655

MAILING ADDRESS: 346 Firing Range Road
Monticello, AR 71655

COUNTY: Drew County

CONTACT NAME: Sean McGaffin

CONTACT POSITION: Plant Manager

TELEPHONE NUMBER: (870) 723-1504

REVIEWING ENGINEER: Christopher Riley

UTM North South (Y): Zone 15: 3719592.54 m

UTM East West (X): Zone 15: 613473.7 m

Section II: INTRODUCTION

Summary of Permit Activity

EnviraPAC Monticello, LLC, located at 346 Firing Range Road, Monticello, Arkansas, produces powdered activated carbon from round wood. The facility has submitted a major modification to:

- Remove sources 06, 10-17, 22, and 25-28 from the permit.
- Add multiple existing sources to the permit. (SN-104 and 109-113)
- Renumber the active sources, new numbers start at SN-101.
- Modify the Insignificant Activities list.
- Increase propane throughput to 312,000 gallons a year.
- Added a Dust Management Plan.

The permitted emission increases are 1.34 tpy SO₂, 0.56 tpy VOC, 10.2 tpy CO, 17.78 tpy NO_x, and 0.08 tpy Total HAP. The permitted emission decreases are 47.75 tpy PM and 2.13 tpy PM₁₀.

Process Description

Feedstock is received at the facility in two possible forms – either as round wood which is stored in the wood yard until it is chipped (SN-101), or as green wood chips produced offsite. Both are ultimately stacked and stored (SN-102) as green wood chips in a pile before being screened and loaded into a green chip hopper (SN-103). During screening, (future: the overs are sent to a rechipper and returned to the screener and) the unders which are stored (SN-104) for sale and removal.

The green wood chips are fed into two rotary drum dryers and cyclones (future: with a third in place as a stand-by unit) fitted with propane burners 20 mmbtu (SN-105a&105b), entering at roughly 50% moisture content and targeting a reduction to below 10% moisture content. The exhaust from this process exits the dryers through their cyclones with the gas being ducted into the thermal combustor fitted with a 128.5 mmbtu burner (SN-108) with a 10 mmbtu propane pilot (SN-107) burner to eliminate potential VOC emissions. The solid particles are recombined with the dried wood chips which are gravity discharged from the dryers and conveyed to the carbonizer feed bin.

The dried wood chips are fed into two carbonization reactors with cyclones, fitted with 2 mmbtu natural gas burners (Insignificant Source) further reducing the moisture content to 0% and converting much of the dried wood chip mass into wood gas which exits through the cyclones with the solid particles being recombined into the carbon product stream. Exiting the cyclone, the wood gas is directed to either the combustor & recuperator (SN-106a&106b) with a 0.048 mmbtu natural gas pilot to aid the carbonization process, the rotary drum dryer to combust as fuel for the drying process, or the thermal combustor (SN-108) to eliminate potential VOC / NO_x / SO₂ emissions. A normally closed wood gas flare with a 0.195 mmbtu natural gas pilot

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(Insignificant Activity) is used only for the emergency situation of needing to purge & re-light the thermal combustor burner should it go out while the carbonization reactors are in operation.

The carbon chip product exits the carbonization process either being rejected and sent through a divert drag chain conveyor (SN-109) and stored in FIBC totes or run through a size reducing crumbler to be stored in either a large carbon storage silo #1 or a smaller surge silo (Insignificant Source) to await grinding. The carbon product from the surge silo is fed into the grinding mills with cyclones and baghouses (SN-110a&110b) to be further reduced in size to a fine powder and subsequently stored in a large carbon storage silo #2 (Insignificant Source).

The granular product in carbon storage silo #1 and the powder product in carbon storage silo #2 can be conveyed to three different locations for final packaging: one for loading bulk trucks via telescopic tube; an FIBC tote packing station which shares a dust collection system (SN-111) with the bulk truck station; or a valve bag packing station for filling 50 lb paper bags which has its own fugitive dust collector (SN-112).

The facility has a 300kW natural gas backup generator (SN-113) on site for emergency use should power go out during operation. The generator cannot supply full power to the site and only critical systems are energized to avoid system damages or endangering personnel.

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
40 CFR 63 ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR 60 JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

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	5.12	15.55
PM ₁₀	3.44	11.87
PM _{2.5}	See Note*	
SO ₂	2.53	9.14
VOC	2.35	8.76
CO	6.0	18.9
NO _x	18.63	72.18
Total HAP	0.02	0.08

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

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Section III: PERMIT HISTORY

On August 8, 2014, Permit #2326-A was issued to the facility. Before the facility started construction, it moved its location across the road and requested a modification. Due to the new location, Permit #2361-A is the new permit for this facility.

On May 24, 2016, Permit #2361-A was issued to the facility. The facility submitted an application for an initial minor source air permit. The total annual permitted emission rate limits were as follows: 63.1 tpy PM, 13.8 tpy PM₁₀, 7.7 tpy SO₂, 8.2 tpy VOC, 8.7 tpy CO and 54.4 tpy NO_x.

On February 1, 2017, Permit #2361-AR-1 was issued to the facility. The facility submitted a de minimis application to:

- Lower the heat input capacity for the thermal combustor SN-07;
- Add steam generator as source SN-22;
- Add 5 combustors and recuperators as sources SN-23 through SN-27; and
- Add a powdered activation carbon halogenation process as source SN-28.

The total annual permitted emission rates increased by 0.2 tpy PM/PM₁₀ and 0.1 tpy SO₂.

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
101	Chipper	PM ₁₀	0.6	2.0
102	Green Chip Storage	PM ₁₀	0.1	0.1
103	Green Chip Loading	PM ₁₀	0.1	0.1
104	Green Chip Residual Sawdust Storage	PM ₁₀	0.1	0.1
105a	40 HP Rotary Dryer #1	PM ₁₀	0.08	1.27*
		SO ₂	0.33	2.34*
		VOC	0.22	1.56*
		CO	1.64	11.7*
		NO _X	2.85	20.28*
105b	40 HP Rotary Dryer #2	PM ₁₀	0.08	1.27*
		SO ₂	0.33	2.34*
		VOC	0.22	1.56*
		CO	1.64	11.7*
		NO _X	2.85	20.28*
106a	Combustor and Recpuerator #1 2.3 MMBTU/hr	PM ₁₀	0.1	0.4**
		SO ₂	0.1	0.5**
		VOC	0.1	0.5**
		CO	0.1	0.5**
		NO _X	0.2	3.7**
106b	Combustor and Recpuerator #2 2.3 MMBTU/hr	PM ₁₀	0.1	0.4**
		SO ₂	0.1	0.5**
		VOC	0.1	0.5**
		CO	0.1	0.5**
		NO _X	0.2	3.7**
107	10 MMBTU/hr Propne Thermal Combustor Pilot Burner	PM ₁₀	0.08	1.27*
		SO ₂	0.17	2.34*
		VOC	0.11	1.56*
		CO	0.82	11.7*
		NO _X	1.43	20.28*
108	128.5 MMBTU/hr Propane Thermal Combustor	PM10	1.1	4.5
		SO2	1.4	6.2
		VOC	1.5	6.6

SN	Description	Pollutant	lb/hr	tpy
		CO	1.5	6.6
		NO _x	11.0	48.1
109	Divert Drag Chain Conveyor	PM ₁₀	0.1	0.1
110a	Grinding Mill #1	PM ₁₀	0.2	0.9
110b	Grinding Mill #2	PM ₁₀	0.2	0.9
111	Carbon Loadout/FIBC Packing Station DC	PM ₁₀	0.2	0.6
112	Valve Bag Packing Station DC	PM ₁₀	0.2	0.8
113	300kW NG Emergency Generator	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.2	0.1
		NO _x	0.1	0.1

*/** - Superscripts indicate a bubbled limit

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
101	Chipper	PM	1.2	4.0
102	Green Chip Storage	PM	0.1	0.1
103	Green Chip Loading	PM	0.1	0.2
104	Green Chip Residual Sawdust Storage	PM	0.1	0.1
105a	40 HP Rotary Dryer #1	PM	0.62	2.85*
105b	40 HP Rotary Dryer #2	PM	0.62	2.85*
106a	Combustor and Recpuerator #1 2.3 MMBTU/hr	PM	0.1	0.4**
106b	Combustor and Recpuerator #2 2.3 MMBTU/hr	PM	0.1	0.4**
107	10 MMBTU/hr Propne Thermal	PM	0.08	2.85*

SN	Description	Pollutant	lb/hr	tpy
	Combustor Pilot Burner			
108	128.5 MMBTU/hr Propane Thermal Combustor	PM	1.1	4.5
109	Divert Drag Chain Conveyor	PM	0.1	0.1
110a	Grinding Mill #1	PM	0.2	0.9
110b	Grinding Mill #2	PM	0.2	0.9
111	Carbon Loadout/FIBC Packing Station DC	PM	0.2	0.6
112	Valve Bag Packing Station DC	PM	0.2	0.8
113	300kW NG Emergency Generator	PM Total HAP	0.1 0.02	0.1 0.08

*/** - Superscripts indicate a bubbled limit

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
101-103, 109,	20%	Reg.19.503
105a-108, 110a-113	5%	Reg.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. [Reg.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. [Reg.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 exceed a throughput of 333,333 tons of green wood chips at the facility per rolling 12 month period. [Reg.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 not exceed 312,000 gallons of propane at the facility per rolling 12 month period. [Reg.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 maintain monthly records to demonstrate compliance with Specific Condition #6 and #7. 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. [Reg.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 test SN-108 for NO_x using EPA Method 7E, for CO using EPA Method 10, and VOC using EPA Method 25A. This test shall take place within sixty (60) days of achieving the earlier of the maximum production rate after Phase II construction or 24 months following initial startup of Phase I in accordance with General Condition #7. Phase I consists of SN-101-103, 105a and b, and 107. Testing shall be conducted with the source operating at least at 90% of its permitted capacity. 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. [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
10. The permittee shall maintain the thermal combustor (SN-108) at a minimum of 1,562 °F as long as the dryers, combustors, and reactors are in operation. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
11. To demonstrate compliance with Specific Condition #10, the permittee shall set and maintain a temperature controller connected to the thermocouple located in the exit of the combustion chamber of the thermal combustor and shall operate a continuous chart recorder to record the measured temperature. 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. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
12. The permittee shall only use wood gas, generated in the process by the carbonizers and activators, as the fuel for SN-106a and 106b. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
13. Nothing in this permit shall be construed to authorize a violation of the Arkansas Water and Air Pollution Control Act or the federal National Pollutant Discharge Elimination

System (NPDES). [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

14. The permittee has a dust management plan (DMP). The DMP as submitted to DEQ is attached as appendix A. The permittee shall comply with the requirements below as part of the DMP implementation:

- a. Minimize the number of times the green wood chip fines are handled;
- b. Move fines from the screener to their storage pile only once per shift when windspeed at the site is low;
- c. Transfer waste carbon into enclosed totes or containers for storage;
- d. Limit vehicles on site to a 15 mile per hour speed limit, and if necessary apply water to roadways to reduce potential dust;
- e. Minimize waste carbon discharge via the Divert Conveyor and apply water if necessary to reduce fugitive dust.

[Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Emergency Engine Conditions (SN-113)

15. The permittee shall not operate the emergency generator SN-103 in excess of 500 total hours (emergency and non-emergency) per calendar year in order to demonstrate compliance with the annual emission rate limits. Emergency operation in excess of these hours may be allowable but shall be reported and will be evaluated in accordance with Rule 19.602 and other applicable regulations. [Rule 19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
16. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #5. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The calendar year 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]
17. SN-103 is subject to 40 C.F.R. § 63 Subpart ZZZZ. The permittee shall meet the requirements of 40 C.F.R. § 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. § 60 Subpart JJJJ. [Rule 19.304 and 40 C.F.R. § 63.6590(c)(1)]
18. Owners and operators of stationary SI ICE with a maximum engine power greater than 19 KW (25 HP) manufactured on or after the applicable date in §60.4230(a)(4) that are rich burn engines that use LPG must comply with the emission standards in §60.4231(c) for their stationary SI ICE. [Rule 19.304 and 40 C.F.R. §60.4233(c)]
19. After July 1, 2010, owners and operators may not install stationary SI ICE with a maximum engine power of less than 500 HP that do not meet the applicable requirements in §60.4233. [Rule 19.304 and 40 C.F.R. §60.4236(a)]
20. In addition to the requirements specified in §§60.4231 and 60.4233, it is prohibited to import stationary SI ICE less than or equal to 19 KW (25 HP), stationary rich burn LPG SI ICE, and stationary gasoline SI ICE that do not meet the applicable requirements specified in paragraphs (a), (b), and (c) of this section, after the date specified in paragraph (a), (b), and (c) of this section. [Rule 19.304 and 40 C.F.R. §60.4236(d)]
21. Owners and operators of stationary SI ICE must operate and maintain stationary spark ignition internal combustion engines that achieve the emission standards as required in §60.4233 over the entire life of the engine. [Rule 19.304 and 40 C.F.R. §60.4234]
22. If you operate and maintain the certified stationary SI ICE and control device according to the manufacturer's emission-related written instructions, you must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required if you are an owner or operator. You must also meet the requirements as specified in 40 CFR part 1068, subpart A-D, as applicable, as they apply to you. If you adjust engine settings according to and consistent with the manufacturer's instructions,

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your stationary SI ICE will not be considered out of compliance. [Rule 19.304 and 40 C.F.R. §60.4243(a)(1)]

23. If you are an owner or operator of a stationary SI ICE greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test within 1 year of engine startup to demonstrate compliance. [Rule 19.304 and 40 C.F.R. §60.4243(a)(2)(ii)]
24. Table 3 to this subpart shows which parts of the General Provisions in §60.1 through §60.19 apply to the permittee. [Rule 19.304 and 40 C.F.R. §60.4246]

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 Jan 25, 2022. [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
Diesel Storage Tank (500 gallons)	A-3
2MMBtu Natural Gas Pilot Light for Carbonization reactor #1	A-1
2MMBtu Natural Gas Pilot Light for Carbonization reactor #2	A-1
0.048 MMBtu Natural Gas Pilor Light for Combustor and Recuperator #1	A-1
0.048 MMBtu Natural Gas Pilor Light for Combustor and Recuperator #1	A-1
0.195 MMBtu Natural Gas Pilot Light for Wood Gas Flare (emergency only)	A-1
Carbon Storage Silo #1 (Closed Loop Vent)	A-13
Carbon Storage Silo #2 (Closed Loop Vent)	A-13
Carbon Surge Silo (Closed Loop Vent)	A-13

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://portal.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]

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Office of Air Quality

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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.adeg.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]

EnviraPAC Monticello, LLC

Permit #: 2361-AR-2

AFIN: 22-00392

Appendix A: Dust Management Plan

EnviraPAC Monticello, LLC
Permit #: 2361-AR-2
AFIN: 22-00392

Appendix B
40 CFR 63 ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary
Reciprocating Internal Combustion Engines

EnviraPAC Monticello, LLC
Permit #: 2361-AR-2
AFIN: 22-00392

Appendix C
40 CFR 60 JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion
Engines