



**DIVISION OF ENVIRONMENTAL QUALITY**

**DRAFT MINOR SOURCE AIR PERMIT**

**PERMIT NUMBER:** 2496-A

**IS ISSUED TO:**

FiberPro LLC  
2727 East Grand Avenue  
Hot Springs, AR 71901  
Garland County  
**AFIN:** 26-01829

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:**

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

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Date

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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 <sub>x</sub>	Nitrogen Oxide
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Equal To Or Smaller Than Ten Microns
PM <sub>2.5</sub>	Particulate Matter Equal To Or Smaller Than 2.5 Microns
SO <sub>2</sub>	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE:	FiberPro LLC
AFIN:	26-01829
PERMIT NUMBER:	2496-A
FACILITY ADDRESS:	2727 East Grand Avenue Hot Springs, AR 71901
MAILING ADDRESS:	2727 East Grand Avenue Hot Springs, AR 71901
COUNTY:	Garland County
CONTACT NAME:	Cody Comeaux
CONTACT POSITION:	EHS Manager
TELEPHONE NUMBER:	(870) 828-1219
REVIEWING ENGINEER:	Sterling Powers
UTM North South (Y):	Zone 15: 3818353.26 m
UTM East West (X):	Zone 15: 501941.76 m

## Section II: INTRODUCTION

### Summary of Permit Activity

FiberPro, LLC is a manufacturer of log and lumber handling machinery in Hot Springs, AR. They requested an initial minor source air permit on July 29th, 2024. This initial air permit included two sources, SN-01 (Paint Booth) and SN-02 (Welding Operations).

Permitted emissions are 1.7 tpy PM<sub>10</sub>, 18.5 tpy VOC, 1.7 tpy PM, and 24.1 tpy Total HAPs.

### Process Description

FiberPro, LLC manufactures log & lumber handling machinery including log bucking, log debarking, conveyors, log/stem singulation systems, log cranes, and processed fiber material handling systems. (NAICS Code 333243 - Sawmill, Woodworking, and Paper Machinery Manufacturing).

The fabrication process consists of cutting metal to the size required for each component, machining each component to proper specifications, assembling the components per design requirements, and painting the assembled units according to order requirements. Following assembly, components are coated in a vented paint booth with a thinner recycler to collect and reuse any excess thinner and a particulate filter. All painting operations are completed in the paint booth with hand-held spray units. A variety of coatings and thinners are used in this process based on customer specification.

### 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

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### 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	8.7	1.7
PM <sub>10</sub>	8.7	1.7
VOC	111.0	18.5
Total HAP	85.1	24.1

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### Section III: PERMIT HISTORY

FiberPro LLC applied for an initial permit on July 29, 2024. This permit included a Paint Booth (SN-01) and Welding Operations (SN-02). Permitted emissions were 1.7 tpy PM<sub>10</sub>, 1.7 tpy PM, 18.5 tpy VOC, and 24.1 tpy Total HAPs.

#### Section IV: EMISSION UNIT INFORMATION

##### 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 through Specific Conditions #5, #8 and #9. [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
01	Paint Booth #1	PM <sub>10</sub>	8.5	1.5
		VOC	111.0	18.5
02	Welding Operations	PM <sub>10</sub>	0.2	0.2

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Specific Conditions #5, #8 and #9. [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
01	Paint Booth #1	PM	8.5	1.5
		Single HAP (Xylene)	78.7	4.4
		Total HAPs	85.0	24.0
02	Welding Operations	PM	0.2	0.2
		Chromium	0.01	0.01
		Cobalt	0.01	0.01
		Manganese	0.10	0.10
		Nickel	0.01	0.01
		Total HAPs	0.10	0.10

\*The potential HAPs emitted for SN-01 included hexamethylene-diisocyanate (HDI). HDI for these emissions is considered polymerized and thus not to be emitted.

3. 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 Rule 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]



4. 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]

#### SN-01 Paint Booth Specific Conditions

5. The permittee shall not exceed a throughput of 10,000 gallons of paint at SN-01 per rolling 12-month period. [Rule No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. 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 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 No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
7. The permittee shall not use any component at SN-01 with VOC content greater than 3.7 lb/gal or a thinner with a VOC content greater than 7.28 lb/gal, and shall maintain monthly records of the facility's VOC emissions. These records shall be updated by the fifteenth day of the month following the month to which the records pertain and submitted in accordance with General Provision #7. This data shall be maintained on-site and made available to Department personnel upon request. These records shall include the following information:
  - a. The name of each VOC containing paint and solvent used that month.
  - b. The VOC content, in lb/gal, of each paint and solvent used as documented by the Manufacturer's MSDS sheet or equivalent.
  - c. The amount of surface coating material, thinner, and primer of each type used.
  - d. A copy of the MSDS sheet for any components used.[§19.705 & A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee shall not use any component at SN-01 that contains HAPs with a TLV below 1 mg/m<sup>3</sup>, and shall maintain monthly records of the facility's HAP emissions. These records shall be updated by the fifteenth day of the month following the month to which these records pertain and submitted in accordance with General Provision #7. These records shall be maintained on-site and made available to Department personnel upon request. These records shall include the following information:
  - a. The name of each HAP containing paint and solvent used that month;
  - b. The HAP content in lb/gal, of each paint/solvent used as documented by the Manufacturer's MSDS sheet or equivalent;
  - c. The amount of coating/thinner of each type used;
  - d. A copy of the MSDS sheet for any components used.

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Note that, the potential HAPs emitted for SN-01 included hexamethylene-diisocyanate (HDI). HDI for these emissions is considered polymerized and thus not to be emitted.

[§19.705 of Rule 19 and/or §18.1004 of Rule 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

#### SN-02 Welding Operations Specific Conditions

9. The permittee shall not use more than 27,990 lb of welding wire at SN-02 per rolling 12-month period, and the welding wire must not have a manganese content of more than 6.62 lb/1000 lb electrode consumed. [Rule 18 §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #9. The permittee shall update these records by the twentieth day of the month following the month to which the records pertain. The 12-month rolling totals and each individual month's data shall be maintained on-site, made available to Department personnel upon request, and submitted in accordance with General Provision #7. [Rule 18 §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
11. The permittee shall only perform welding operations between the hours of 6 am to 6 pm. [Rule 18 §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
12. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #11. These records shall consist of log sheets with the time of day and the duration of the welding activity. The permittee shall update these records by the twentieth day of the month following the month to which the records pertain. The 12-month rolling totals and each individual month's data shall be maintained on-site, made available to Department personnel upon request, and submitted in accordance with General Provision #7.[Rule 18 §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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#### 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 29, 2024. [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
Burn Table	A-13
CNC Machine	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://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

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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://eportal.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]