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Air Enforcement: Arkansas Department of Energy and Environment - Division of Environmental Quality and Little Rock Decking/Railing Products Manufacturing Facility Enter into Consent Administrative Order

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The Arkansas Department of Energy and Environment - Division of Environmental Quality ("ADEQ") and Trex Company, Inc. ("TCI") entered into an October 13th Consent Administrative Order ("CAO") addressing alleged violations of an Air Permit. See Case #: CAO-25-0152.

The CAO provides that TCI operates a composite decking and railing products manufacturing facility located in Little Rock, Arkansas.

The facility is stated to have been issued an Air Minor Source Permit and is subject to Subpart JJJJ – Standards of Performance for Stationary Ignition Internal Combustion Engines.

TCI is stated to have submitted a modification application for the Air Permit on October 30, 2025.

ADEQ's review of the modification application is stated to have identified that TCI installed:

- One (1) Reclaim Silo.
- Three (3) MAH Filter Receivers.
- Three (3) Color Filter Receivers.
- One (1) Reclaim Hopper.
- Six (6) Secondary Reclaim Filter Receivers.
- Two (2) Emergency Engines.
- Four (4) Cooling Towers.

The referenced items are stated to have not been authorized by the Air Permit.

TCI is stated to, on January 22, have indicated to ADEQ finalization of site equipment plans, additional air emission sources were identified that required inclusion in the Permit and that certain of those air emission sources had mistakenly been put in place prior to Permit issuance.

The company stated that the unpermitted sources would be permitted upon issuance of the new permit. Further, on January 27th the company submitted a self-report identifying that the facility had exceeded the 100 operating hour limit on an emergency generator.

The CAO indicates that on May 27th a subsequent Air Permit was issued adding various new emission sources.

TCI on July 13th indicated that the emergency generator issue was mistakenly operated by the site's principal construction contractor for approximately 646 hours during July and the first week of August 2025 to support construction operations of the decking electrical room. Further, once the company became aware of the situation, it put corrective actions in place.

The CAO lists the following violations:

- Air emission sources installed exceed those allowed by the Permit.
- Exceeded the 100 operating hour limit at SN-153 by operating the generator for 646 hours during July and August 2025.

A civil penalty of \$11,000 is assessed, which could have been reduced by one-half if the document was signed and returned to ADEQ within 20 calendar days of its receipt.

A copy of the CAO can be found [here](#).