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Air Enforcement: Arkansas Department of Environmental Quality and Dallas County, Arkansas Lumber Mill Owner/Operator Enter into Consent Administrative Order

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The Arkansas Department of Environmental Quality ("ADEQ") and Idaho timber of Carthage, LLC ("Idaho Timber") entered into a Consent Administrative Order ("CAO") addressing alleged air violations. See LIS No. 17-016.

Idaho Timber is stated to own and operate a lumber mill in Carthage, Arkansas.

The lumber mill is stated to have been issued Air Operating Permit 0551-AOP-R6 ("AOP"). Stack tests results were submitted to ADEQ for emissions testing conducted April 5-6, 2016. The results of the test are stated to have indicated that the Wood Waste Fired Boiler (SN-01) exceeded the permitted emission rates for Particulate Matter ("PM"), Particulate Matter less than 10 microns in diameter ("PM10"), and Nitrogen Oxides ("NOx"). These results are alleged to violate Specific Conditions 1 and 2 of the AOP.

The CAO states that Specific Condition 8 of the AOP provides that the emission testing results shall be extrapolated to correlate with 100% of the permitted capacity to demonstrate compliance. It further provides:

The permitted production rate was 204 tons per day. Test results indicated that during the emissions test, the production rate was 74.68 tons per day. Based on the extrapolated emission test results, the production rate at SN-01 is limited to 82.15 tons per day.

Idaho Timber provided a plan of action to ADEQ in regards to the failed stack test which would include repairs to the boiler and emissions re-test for PM, PM10 and NOx.

An August 23, 2016 inspection for the reporting period August 2015 through August 2016 indicated that the lumber mill exceeded the 82.15 tons per day capacity rate limit at SN-01 on 81 days between April 6, 2016 and August 22, 2016. Additional exceedances were identified based on agency review of production rate records which are described in the CAO.

Idaho Timber addressed the compliance issues identified in the previously referenced inspection noting:

...because the daily fuel usage limit has never been established based on measured steam output, it is not appropriate to set the fuel usage limit based on a failed stack test when the boiler was not operating efficiently. Idaho Timber will schedule a retest within 60 days after the repairs have been completed to

establish an appropriate fuel usage limit. Idaho Timber is preparing to submit the Title V renewal application by October 15, 2016 to address the boiler emission limits as well as the fuel usage limit.

A Title V renewal application was submitted to ADEQ on October 28, 2016. This renewal application requested the revision of monitoring requirements of SN-01 to steam output rather than tons of wood waste fired. Increased emission rate limits were also requested for PM, PM10 and NOx at SN-01.

A performance test of SN-01 was scheduled for March 15, 2017.

The CAO provides that it addresses the exceedances of the daily capacity rate limit of SN-01 for the reporting period April 8, 2016 through March 15, 2017. Further, the performance testing scheduled for March 15, 2017 will establish a new daily capacity rate limit for SN-01. The performance test at SN-01 will demonstrate compliance with the emission limits listed on the Title V renewal application.

A civil penalty of \$6,600 is assessed.

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