

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **06 2007 - 006** Project Number: 2007-03-022

Parent Company: Havco Wood Products, Inc.

Parent Company Address: P.O. Box 1342, Cape Girardeau, MO 63702

Installation Name: Havco Wood Products, Inc.

Installation Address: 3200 E. Outer Road, Cape Girardeau, MO 63702

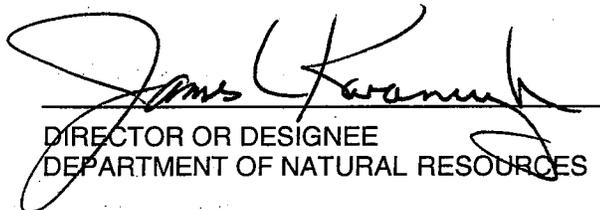
Location Information: Scott County, S25, T30N, R13E

Application for Authority to Construct was made for:
Construction of a clamshell sawdust bin to replace one of two existing sawdust trailers. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

-
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

JUN 12 2007

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2007-03-022
Installation ID Number: 201-0021
Permit Number:

Havco Wood Products, Inc.
3200 E. Outer Road
Cape Girardeau, MO 63702

Complete: 03/06/2007
Reviewed: 03/29/2007

Parent Company:
Havco Wood Products, Inc.
P.O. Box 1342
Cape Girardeau, MO 63702

Scott County, S25, T30N, R13E

REVIEW SUMMARY

- Havco Wood Products, Inc. has applied for authority to install a clamshell sawdust bin to replace one of two existing sawdust trailers.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- A cyclone is being used to control the particulate matter emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are below de minimis levels but above insignificant levels.
- This installation is located in Scott County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

- Emissions testing is not required for the equipment.
- An application to amend the installations Part 70 Operating Permit is required within 1 year to reflect this permit.
- Approval of this permit is recommended without special conditions.

INSTALLATION DESCRIPTION

Havco Wood Products, Inc. (Havco) produces laminated oak flooring for dry van trailers, truckbodies and containers at their location in Scott County, Missouri. The flooring process begins with raw lumber (red and white oak). The wood is stacked and dried, then kiln dried to insure the proper moisture content. Other processes includes planing, sawing, sanding and gluing wood.

Havco was issued a Part 70 Operating Permit (Permit No. OP2000-072) from the Air Pollution Control Program (APCP). A renewal application for this permit was received at the APCP on 12/9/2004 and is currently under review.

The following permits have been issued to Havco Wood Products, Inc. from the Air Pollution Control Program.

Table 1. Previously Issued Construction Permits

Permit Number	Description
1186-005	Wood Waste Fired Boiler
1194-009	One (1) 660 Horsepower (HP) boiler, three (3) new drying kilns, and a pre-drying building
1097-020	Change to multi-clone from cyclone
022000-003	New Production Line
022001-012	New Laminating Process

PROJECT DESCRIPTION

Havco has applied for authority to install a clamshell sawdust bin to replace one of two existing sawdust trailers. The clamshell sawdust bin will be controlled by a cyclone at the exhaust of the existing pre-surface operation. Currently green sawdust from the pre-surfacing operation exhausts through a fan into one of two sawdust trailers. With the new equipment, one of the trailers will be removed and the exhaust from the pre-surfacing operation will be directed to the new bin with the remaining trailer as backup.

Emissions from EP-01 will remain unchanged, as the fan will continue to exhaust at the same rate into the bin as it currently does into the two trailers. Fugitive emissions from the emission point will decrease, as the enclosed bin will capture most of these emissions. There will be emissions from the clamshell dumping sawdust via gravity onto trucks. The area where trucks receive the sawdust will be enclosed on two sides to decrease fugitive emissions.

The maximum throughput for the new clamshell bin is 3000 lb/hr or 1.5 tons/hr.

EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the Environmental Protection Agency (EPA) Factor Information Retrieval (FIRE) Version 6.25 Data System.

Table 2. Uncontrolled Potential-To-Emit (PTE) Calculation (tons per year)

Emission Point	SCC	Process Description	PM ₁₀ Factor (lbs/unit)	Units	Maximum Design Rate	PTE (lb/hr)	PTE (tons/year)
EP-01A	3-07-030-02	Wood Waste Storage Bin Loadout	1.2	Tons	1.5 ton/hr	1.80	7.88

Potential emissions of the application, shown in Table 2, represent the uncontrolled potential of the new equipment, assuming continuous operation (8760 hours per year). The existing actual emissions are from the installations 2005 Emission Inventory Questionnaire (EIQ) submittal and represent emissions for the entire installation. Table 3 provides an emissions summary for this project.

Table 3. Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions ¹	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	149.65	49.91	7.88	N/A
SO _x	40.0	1.1	3.12	0.00	N/A
NO _x	40.0	30.3	28.32	0.00	N/A
VOC	40.0	28.02	3.36	0.00	N/A
CO	100.0	222.6	74.01	0.00	N/A
HAPs	10.0/25.0	6.82	0.00	0.00	N/A

*N/A = Not Applicable

¹ Existing Potential Emissions were calculated from Permit No. 022001-012

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are below de minimis levels. The hourly potential emissions of PM₁₀ of 1.80 lb/hr are above the insignificant levels of 1.0 lb/hr and hence the need for this construction permit.

APPLICABLE REQUIREMENTS

Havco Wood Products, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits, 10 CSR 10-6.065*
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Restriction of Emission of Odors, 10 CSR 10-3.090*

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted without special conditions.

Maurice Chemweno
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated March 05, 2007, received March 06, 2007, designating Havco Wood Products, **Inc.** as the owner and operator of the installation.
- U.S. EPA Factor Information Retrieval (FIRE) Version 6.25 Data System.
- Southeast Regional Office Site Survey, dated March 14, 2007.

Mr. Dave Lowes
Maintenance Department Manager
Havco Wood Products, Inc.
3200 E. Outer Road
Cape Girardeau, MO 63702

RE: New Source Review Permit - Project Number: 2007-03-022

Dear Mr. Lowes:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:mcl

Enclosures

c: Southeast Regional Office
PAMS File 2007-03-022

Permit Number: