

Air Curtain Incinerators: Arkansas Department of Environmental Quality Announces New General Air Permit



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The Arkansas Department of Environmental Quality (“ADEQ”) announced the issuance of a new General Air Permit for “air curtain incinerators.”

An air curtain incinerator is described as a unit operating by forcefully projecting a curtain of air across an open, integrated combustion chamber (fire box) or open pit or trench (trench burner) in which combustion occurs.

General permits (air, water, etc.) are sometimes promulgated at both the state and federal level to streamline/standardize permitting requirements. This type of permit allows a regulated entity to forego acquiring an individual permit. For example, the United States Environmental Protection Agency noted in an April 12 letter to the California Air Pollution Control Officers Association that permitting authorities have the option of developing general permits pursuant to 40 C.F.R. 70.6 (d) to ease the administrative burden of issuing source-specific Title V permits to air curtain incinerators.

A general permit will typically incorporate standardized requirements for specific classes of facilities. To qualify for a particular general permit an applicant’s operation or facility must fit within the specified eligibility criteria or description and submit a Notice of Intent or similar document to the agency. Once submitted, the facility is required to meet any applicable procedures or mandates which may involve emission limits, work practices, or monitoring provisions. In the event a facility or source cannot meet such conditions it must apply for an individual air permit.

ADEQ limits eligibility for Air Curtain Incinerator General Permits to only those facilities that burn wood waste, clean lumber, yard waste, or a mixture of all three – depending on the restrictions of the permit. As with all ADEQ air general permits, an applicant must submit a Notice of Intent and follow the other procedural requirements.

[A link to ADEQ’s announcement regarding this new General Permit can be found here.](#)

[A copy of the referenced April 12, 2016 United States Environmental Protection Agency letter can be found here.](#)