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Air Enforcement: Arkansas Department of Energy & Environment - Division of Environmental Quality and El Dorado Sawmill Enter into Consent Administrative Order

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The Arkansas Department of Energy & Environment – Division of Environmental Quality (“DEQ”) and Resolute El Dorado, Inc. (“Resolute”), entered into a January 25th Consent Administrative Order (“CAO”) addressing alleged violations of an air permit. See LIS No. 23-011.

The CAO provides that Resolute owns and operates a sawmill (“Facility”) in El Dorado, Arkansas.

The Facility operates pursuant to an air permit.

DEQ personnel are stated to have performed a routine compliance inspection on March 23, 2022, of the Facility. Such inspection covered the reporting period of February 1, 2020, through February 28, 2022.

The inspection is stated to have determined that Resolute failed to provide documentation of the implementation of a maintenance and housekeeping plan for SN-01 and SN-02 for 25 months. This is alleged to constitute a failure of Specific Condition 8 of the air permit.

The inspection is also stated to have indicated that Resolute failed to provide documentation that maintenance was being routinely conducted on four occurrences for SN-06 and SN-08. Such alleged failure is stated to violate Specific Condition 16 of the air permit.

Resolute provided in correspondence dated May 5, 2022, a kiln maintenance plan. The kiln maintenance plan provided for weekly inspections and weekly lubrication of the kiln fan shaft bearings. It also provided some documentation of routine maintenance for SN-01 and SN-02 showing a repair of kiln burners in October of 2021. Also provided was documentation of the performance of the kiln maintenance plan for February 2022 and part of March 2022.

The CAO provides that there were no other records produced by Resolute that demonstrated compliance with the kiln maintenance plan. It is stated that in total 24 months or 104 weeks of kiln maintenance records were missing and not provided by Resolute.

Resolute in correspondence dated May 5, 2022, provided records of some repairs performed on SN-06 and SN-08 during the inspection period. However, Resolute is stated to have not provided specific documentation of routine maintenance as required by Specific Condition 16. As a result, the CAO states that compliance with Specific Condition 16 was not demonstrated.

Resolute requested in correspondence dated December 1, 2022, a penalty reduction. It provided missing maintenance records for SN-01 and SN-02. The records covered February 1, 2020, through February 28, 2022. They were missing the Facility name and location and the name of the person conducting maintenance. Therefore, the CAO provides that the records did not satisfy Specific Condition 8 of the air permit.

Resolute neither admits nor denies the factual and legal allegations contained in the CAO.

Within 30 calendar days of the effective date of the CAO, Resolute is required to submit a maintenance schedule for SN-06 and SN-08. The maintenance schedule is required to address:

- Weekly maintenance
- Monthly maintenance
- Six-month maintenance
- Bag replacement
- Bag cleaning
- Lubrication

Within 30 calendar days of the effective date of the CAO, Resolute is also required to submit maintenance records showing compliance with Specific Condition 8 and Specific Condition 16. Such records are required to include:

- Facility name
- Facility location
- Name of maintenance conductor
- Total work time

The records are required to be submitted monthly for a period of six months.

The CAO assesses a civil penalty of \$12,480.

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