Part 8 of 13

ARD000488312 PE

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 233-AOP-R1

IS ISSUED TO:

Georgia-Pacific Fordyce, AR Plywood
600 W. College St.
Fordyce, AR 71742
Dallas County
CSN: 20-0004

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

April 6, 1999 and April 5, 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

August 25, 2000
Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE:	Georgia-Pacific Fordyce, AR Plywood
CSN:	20-0004
PERMIT NUMBER:	233-AOP-R1
FACILITY ADDRESS:	600 W. College St.
COUNTY:	Dallas
CONTACT POSITION:	Kenny Martindale
TELEPHONE NUMBER:	(870) 352-6100
REVIEWING ENGINEER:	Shane Byrum
UTM North-South (X):	3741
UTM East-West (Y):	555

SECTION II: INTRODUCTION

This project primarily involves the replacement of steam coils within the dryer. The emission from the hot zones of the dryers are routed to a regenerative thermal oxidizer (RTO). The project involves removing three, five-row steam coils from the first six doors of the dryer and replacing them with three, six-row steam coils. Three of the five-row steam coils removed from the first six doors will replace three of the four-row steam coils in the last six doors of the dryer. The added coils will slightly increase both the operating temperature and maximum production capacity of the dryer. The maximum rated capacity for the #3 Dryer, following these modifications, will be 15.2 thousand square feet (msf) per hour and 133,152 msf annually (3/8 inch basis).

In addition to the #3 Dryer rebuild, the permittee is proposing additional changes that will lead to a net reduction in particulate matter. First, a new baghouse (designated SN-02 in this permit) will be installed downstream of the existing cyclone receiving the exhausts from the Skinner Saw, Skinner Saw Hog, and Specialty and Tongue and Groove Machines. The cyclone for SN-03, which previously received the exhaust from the Glueline Hog, will be eliminated and the flow from that system will be directed through the SN-02 cyclone and new baghouse. In addition, two new systems, a cut-to-size panel saw and a 99-inch veneer trim saw, will also be vented through this cyclone and new baghouse. The permittee also plans to replace the existing multiclones serving the 4-Head Sander and Specialty Machine Sanding areas (SN-05) with a baghouse.

All of the emission increases of criteria pollutants associated with the #3 Dryer rebuild were below the PSD significance levels except for PM_{10}. Therefore, a netting analysis was performed for PM_{10}. This netting analysis shows a net decrease of PM10 of 49.53 tpy, therefore PSD review is not required for this project. The complete netting analysis for the #3 Dryer Rebuild project is presented in the table below.

Georgia-Pacific Fordyce, AR Plywood
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Source ID	Description	PM (tpy)	PM_{10} (tpy)	SO2 (tpy)	NO_x (tpy)	CO (tpy)	VOC (tpy)	Lead (tpy)
Modified and Affected Sources Associated with the #3 Dryer Rebuild								
SN-01	Wood Residuals Boiler	10.34	10.34	0.60	8.14	72.23	1.20	0.017
SN-02	Skinner Saw/Specialty T & G Machine/Glueline Hog	0.7	0.7	--	--	--	--	--
SN-03	Glueline Hog	--	--	--	--	--	--	--
SN-04	Sanderdust Relay	2.11	2.11	--	--	--	--	--
SN-05	Sanding	7.5	7.5	--	--	--	--	--
SN-07	Chip Screen	0.07	0.07	--	--	--	--	--
SN-100	Debarker	0.52	0.24	--	--	--	--	--
SN-103	Plywood Presses	0.34	0.34	--	--	--	2.14	--
SN-104	Glueline	--	--	--	--	--	0.01	--
SN-105	Storage Area	--	--	--	--	--	1.07	--
	Modified #3 Dryer (via RTO)	2.08	2.08	--	--	--	5.08	--
Total Modification Increase		23.66	23.38	0.60	8.14	73.23	9.50	0.017
PSD Significance Levels		25	15	40	40	100	40	0.6
Netting Triggered?		No	Yes	No	No	No	No	No
Netting Analysis/Creditable Increases and Decreases								
	Installation of RTO	--	-4.47	--	--	--	--	--
SN-03	Removal of Cyclone	--	-8.6	--	--	--	--	--
SN-05	Removal of Multiclones	--	-59.6	--	--	--	--	--
Net Emissions Change		N/A	-49.29	N/A	N/A	N/A	N/A	N/A
PSD Triggered?		No	No	No	No	No	No	No

Georgia-Pacific Fordyce, AR Plywood
Permit # 233-AOP-R1 CSN: 20-0004

Facility Process Description

Georgia-Pacific's Fordyce Plywood facility receives logs for processing into plywood. The incoming logs are unloaded in the log debarking and handling area. The debarkers (SN-100) remove the bark from the logs. Debarked logs are sent to the block saws to be cut to size. The bark is mechanically conveyed to the hammer hog, where it is shredded before being conveyed to the fuel house. The trimmed-off ends of the logs from the buck saw are sent to the lilypad chippers, where they are chipped before being sent to the chip screen. The chip screen receives chips from the lilypad chippers, the core chipper, and the veneer chippers. The green chips are pneumatically conveyed to cyclone C7 (SN-07) and shipped off site via railcar. The fines are mechanically conveyed to the fuel house. The cut logs proceed to the log-soaking vats. The log soaking process conditions and softens the logs. After soaking in the hot water, the logs are mechanically conveyed to the green end processes, which consist of the lathes and the veneer clippers.

In the green end processes, the lathes peel the log into thin sheets of green veneer, which are then clipped to size by the veneer clippers. The higher quality log cores are shipped offsite while the lower quality cores are chipped at the core chipper. The chips are conveyed to the chip screen. The veneer trimmings from the veneer clipper are chipped by the veneer chipper. Chips generated by the veneer chipper are conveyed to the chip screen. High quality clipped green veneer proceeds to the dryer. Some veneer may be routed to the fishtail saw before proceeding to the center cut saw or veneer dryers. Lower quality green veneer is cut into smaller strips by the center cut saw. The higher quality veneer will form the faces of the plywood panel, while smaller strips will form the core. The sawdust generated by the fishtail saw is pneumatically conveyed to cyclone C7 (SN-07) for shipment offsite.

Green veneer is dried by three indirect steam heated veneer dryers (SN-06). The exhaust from the veneer dryers "hot zone" stacks containing VOC emissions is controlled by a 4-canister Regenerative Thermal Oxidizer (RTO) manufactured by Smith Engineering Company (SN-06). The RTO will be designed for at least 95% destruction of VOCs. The wood residuals boiler (SN-01) combusts residuals generated by various wood processes. The combustion exhaust from the boiler passes through a multiclone and a scrubber before being released to the atmosphere. After being dried, the veneer is sent to the 99 inch trim saw. The trim is pneumatically conveyed to the fuel house via cyclone controlled by a baghouse C2 (SN-02). Some veneer may be sent to the dry core saw, plug saw or strip saw. The trim from the saws is pneumatically conveyed to the fuel house via cyclone and baghouse C2 (SN-02). The sawdust generated by the saws is pneumatically conveyed to the fuel house via cyclone and baghouse C2 (SN-02). This veneer may be stored temporarily before proceeding to the sheet drop and glue line (SN-104).

The sheet drop uses a pneumatic system to pick up sheets of face veneer and lay them on the glue line. Glue, core material, and face veneer are applied in alternating layers until the desired plywood panel thickness is achieved. Any wood residuals generated in the glue line are hogged in the glue line hog and pneumatically conveyed to the fuel house via cyclone and baghouse C2 (SN-02). The unpressed plywood panel then proceeds to the presses (SN-103). In the presses, the combination of heat and pressure that is applied to the panels cures the glue and forms the plywood panel. After the presses, the panels may be temporarily stored in the storage area (SN-105) before being trimmed at the skinner saws. The wood residuals generated by the skinner saw are conveyed to the skinner saw hog and hogged before being pneumatically conveyed to the fuel house via cyclone and baghouse C2 (SN-02). The sawdust generated by the skinner saw is pneumatically conveyed to the fuel house via cyclone and baghouse C2 (SN-02). The trimmed plywood panel is then patched at the patch line (if needed) and may be sent to either the specialty and tongue and groove machine ,4-head sander and/or cut-to-size saw, based on demand. The sawdust generated from the specialty and tongue and groove machine is sent to the fuel house via cyclone and baghouse C2 (SN-02). Any sanderdust generated by the speciality and tongue and groove machine is conveyed to the boiler by baghouse C5 (SN-05) and cyclone C4 (SN-04) in series. The 4-head sander is attached to a pneumatic system which conveys the sanderdust generated to the sanderdust bin via baghouse C5 (SN-05) and cyclone C4 (SN-04) in series. After any of these processes, the panels may be sent to edge sealing operations, where they are stacked and the ends of the stacks are spray painted and may be stenciled with the Georgia-Pacific logo. Finished plywood may be stored prior to shipment offsite.

The facility is classified under SIC code 2436. Total facility wide emissions are summarized below.

Georgia-Pacific Fordyce, AR Plywood
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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	60.8	265.6	N/A
		PM_{10}	59.3	259.0	
		SO_2	16.1	7.5	
		VOC	47.4	210.4	
		CO	291.7	1276.1	
		NO_x	35.3	155.8	
		Pb	0.1	0.1	
		Air Contaminant			
		Chlorine	0.25	1.07	
		HAPs			
		Acetaldehyde[1]	0.96	4.17	
		Acrolein[1]	0.02	0.10	
		Phenols[1]	8.42	37.06	
		POM[1]	0.01	0.04	
		Formaldehyde[1]	1.86	8.28	
		Benzene[1]	0.13	0.54	
		Arsenic[2]	0.03	0.02	
		Cadmium[2]	0.01	0.01	
		Cobalt[2]	0.01	0.02	
		Manganese[2]	0.28	1.22	
		Nickel[2]	0.02	0.08	
		MEK[1]	0.31	1.39	
		Methanol[1]	4.45	19.36	
		Toluene[1]	0.57	2.45	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-01	Wood Residuals Boiler	PM	40.0	175.0	13
		PM_{10}	40.0	175.0	
		SO_2	16.0	7.0	
		VOC	4.6	20.0	
		CO	283.0	1,238.0	
		NO_X	31.0	137.0	
		Pb	0.1	0.1	
		Air Contaminant			
		Chlorine	0.25	1.07	
		HAPs			
		Phenols	0.02	0.06	
		POM	0.01	0.04	
		Formaldehyde	0.21	0.91	
		Benzene	0.12	0.50	
		Arsenic	0.03	0.02	
		Cadmium	0.01	0.01	
		Cobalt	0.01	0.02	
		Manganese	0.28	1.22	
		Nickel	0.02	0.08	
SN-02	Skinner Saw, Glue Line Saw, Cut-to-size Saw, Veneer Trim Saw, Specialty and Tongue and Groove Machine, Skinner Saw Hog, Glue Line Hog (Cylone and Baghouse in series)	PM	2.4	10.4	18
		PM_{10}	2.4	10.4	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-03	Glueline Hog (Cyclone)	Cyclone removed and emissions routed through SN-02			
SN-04	Sanding (Cyclone)	PM	2.9	12.9	16
		PM_{10}	2.9	12.9	
SN-05	Sanding (Baghouse)	PM	1.8	7.5	16
		PM_{10}	1.8	7.5	
SN-06	Veneer Dryers (3) Controlled by RTO	PM	5.7	24.7	20
		PM_{10}	5.7	24.7	
		SO_2	0.1	0.4	
		VOC	10.9	47.4	
		CO	8.7	38.1	
		NO_X	4.3	18.8	
		HAPs			
		Acetaldehyde	0.38	1.65	
		Acrolein	0.02	0.10	
		Benzene	0.01	0.04	
		Formaldehyde	0.14	0.62	
		MEK	0.11	0.49	
		Methanol	1.18	5.15	
		Toluene	0.38	1.65	
SN-06A	Veneer Dryer Infeed Vents (1 vent on each dryer for a total of 3 vents)	VOC	5.8	25.1	20

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-06B	Veneer Dryer Cooling Vents (3 vents on each dryer for a total of 9 vents)	PM	3.1	13.4	20
		PM_{10}	3.1	13.4	
		VOC	9.7	42.6	
		Acetaldehyde	0.19	0.82	
		Formaldehyde	0.42	1.85	
		Methanol	0.09	0.41	
SN-07	Screening (Cyclone)	PM	0.4	1.8	18
		PM_{10}	0.4	1.8	
SN-100	Debarking	PM	2.7	12.0	27
		PM_{10}	1.2	5.4	
SN-103	Plywood Press 1 Plywood Press 2 Plywood Press 3 Plywood Press 4	PM	1.8	7.9	25
		PM_{10}	1.8	7.9	
		VOC	11.0	50.0	
		HAPs			
		Acetaldehyde	0.39	1.70	
		Formaldehyde	0.54	2.40	
		MEK	0.20	0.90	
		Methanol	3.00	13.0	
		Toluene	0.19	0.80	
		Phenols	8.40	37.0	
SN-104	Glueline	VOC	0.1	0.3	25
		HAPs			
		Formaldehyde	0.01	0.10	
		Methanol	0.18	0.80	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-105	Storage Area	VOC	5.7	25.0	25
		HAPs			
		Formaldehyde	0.54	2.40	

[1] - The identified HAPs are included in the VOC totals.

[2] - The identified HAPs are included in the PM & PM_{10} totals.

SECTION III: PERMIT HISTORY

Permit #233-A was issued on July 26, 1974. This modification allowed the facility to replace all existing boilers with a single wood waste boiler and installation of a baghouse to control the emissions generated by the waste handling system.

Permit 233-AOP-R0 was issued on 4/6/99. This was the first Title V permit issued to this facility. This permit covered all equipment installed before 1972 and installation of a regenerative thermal oxidizer to control the emissions from the veneer dryers. The increase in potential emissions due to permitting the above mentioned equipment did not trigger a PSD review, because no physical modifications were made to the sources since the issuance of Air Permit 233-A.

SECTION IV: EMISSION UNIT INFORMATION

Georgia-Pacific Fordyce, AR Plywood
Permit # 233-AOP-R1 CSN: 20-0004

SN-01
Wood Residuals Boiler

Source Description

The wood residuals boiler (SN-01) has a rated capacity of 185 million Btu per hour. This boiler primarily provides steam to veneer dryers, presses, and log vats. The wood waste fired in this boiler consists of bark, plywood sanderdust, plywood trim, log vat debris, and glueline residuals.

The permittee is allowed to burn spec oil instead of wood waste. In order to make record keeping requirements easier and more effective, the alternative fuel usage will be limited by gallons of spec oil combusted.

The boiler was installed before June 19, 1984. Therefore, the boiler is not subject to 40 CFR Part 60, Subpart Db -- *Standards of Performance for Industrial- Commercial-Institutional Steam Generating Units.*

Specific Conditions

1. Pursuant to §19.501 et seq of the Arkansas State Implementation Plan for Air Pollution Control, effective February 15, 1999 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The lb/hr rates were verified through testing performed on 8/26/99. The ton per year emission rates for wood waste are based on maximum capacity for all pollutants except for SO_2. Annual SO_2 emissions are limited by oil waste firing limit set forth in this section.

SN-#	Pollutant	lb/hr	tpy
01	PM_{10}	40.0	175.0
	SO_2	16.0	7.0
	VOC	4.6	20.0
	CO	283.0	1,238.0
	NO_X	31.0	137.0
	Pb	0.1	0.1

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the HAP emission rates set forth in the following table. The pound per hour emission rates for both wood

waste and oil waste are based on maximum capacity. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

SN-#	Pollutant	lb/hr	tpy
01	PM	40.0	175.0
	Phenols	0.02	0.06
	POM	0.01	0.04
	Formaldehyde	0.21	0.91
	Benzene	0.12	0.50
	Arsenic	0.03	0.02
	Cadmium	0.01	0.01
	Chlorine	0.25	1.07
	Cobalt	0.01	0.02
	Manganese	0.28	1.22
	Nickel	0.02	0.08

3. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity at source SN-01 as measured by EPA Method 9. The permittee will show compliance by Specific Condition 4.

4. Pursuant to §19.703 of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), and 40 CFR Part 52 Subpart E, and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain a scrubber water flow rate of at least 238 gpm during operation of SN-01. The permittee shall check and record the scrubber water flow rate at least once per day.

5. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall keep records of the scrubber water flow rate. These records shall be updated on a daily basis, kept on site, and made available to Department personnel upon request.

6. Pursuant to §19.705 of Regulation 19, A.C.A §8-4-203 as referenced by §8-4-304, §8-4-311, and 40 CFR 70.6, throughput shall not exceed 5,000 gallons of on-site generated spec oil to the wood residuals boiler during any twelve consecutive months.

7. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the spec oil firing limit set in Specific Condition 6 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. A consecutive twelve month total and each individual month's data shall be submitted in accordance with General Provision 7.

SN-04 & SN-05
Sanderdust Collection System

Source Description

The fine wood particulate generated by the tongue and groove machine and four head sander are pneumatically conveyed to the sanderdust bin via a cyclone (SN-04). The cyclone is used to convey the finer wood particules to the sanderdust bin for storage prior to being fired in the wood waste boiler. Particulate emissions from the 4 Head Sander and Specialty Machine Sanding area are controlled by a baghouse (SN-05).

Specific Conditions

8. Pursuant to §19.501 et seq of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year emission rates are based on maximum capacity. The pound per hour rates for SN-04 were verified on 8/25/99. The pound per hour rates for SN-05 will be verified through Specific Condition 12.

SN-#	Pollutant	lb/hr	tpy
04	PM_{10}	2.9	12.9
05	PM_{10}	1.8	7.5

9. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. These emission rates are based on the maximum capacity of the equipment.

SN-#	Pollutant	lb/hr	tpy
04	PM	2.9	12.9
05	PM	1.8	7.5

10. Pursuant to §18.501 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 20% opacity at SN-04 or 5% opacity at SN-05 as measured by EPA Method 9.

11. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from SN-04 and weekly observations of the opacity from SN-05 shall be conducted by personnel familiar with the permittee's visible emission. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with the specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.

    a. The date and time of the observation.
    b. If visible emissions which appeared to be above the permitted opacity were detected.
    c. If visible emissions which appeared to be above the permitted opacity were detected, the cause of the exceedence of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted opacity after the corrective action was taken.
    d. The name of the persons conducting the opacity observations.

12. Pursuant to §19.702 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall measure the particulate emissions from SN-05 using EPA Reference Method 5 within 180 days of permit issuance. The total process throughput at the 4-head sander and speciality sander shall be at least 85,500 sf/hr (3/8" basis) at the time of test. Failure to test at or above this level shall limit the permittee to operating within 10 percent above the tested rate.

SN-02 & SN-07
Residuals Collection System

Source Description

The wood residuals generated by the skinner saw, skinner saw hog, specialty/tongue and groove machine, plug saw, dry core saw, and glueline hog are pneumatically conveyed to the fuel house via cyclone in series with a baghouse (SN-02). This cyclone is used to convey dry wood waste to the fuel house for storage prior to being fired in the woodwaste boiler. Green wood chips are pneumatically conveyed to cyclone C7 (SN-07) and shipped off site via railcar.

Specific Conditions

13. Pursuant to §19.501 et seq of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year emission rates are based on maximum capacity. The pound per hour rates for SN-07 were verified on 8/25/99.

SN-#	Pollutant	lb/hr	tpy
02	PM_{10}	2.4	10.4
07	PM_{10}	0.4	1.8

14. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. These emission rates are based on the maximum capacity of the equipment.

SN-#	Pollutant	lb/hr	tpy
02	PM	2.4	10.4
07	PM	0.4	1.8

15. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity at SN-07 as measured by EPA Method 9.

16. Pursuant to §18.501 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity at SN-02 as measured by EPA Method 9.

17. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from SN-07 and weekly observations of the opacity at SN-02 shall be conducted by personnel familiar with the permittee's visible emission. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with the specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.

    a. The date and time of the observation.
    b. If visible emissions which appeared to be above the permitted opacity were detected.
    c. If visible emissions which appeared to be above the permitted opacity were detected, the cause of the exceedence of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted opacity after the corrective action was taken.
    d. The name of the persons conducting the opacity observations.

18. Pursuant to §19.702 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall measure the particulate emissions from SN-02 using EPA Reference Method 5 within 180 days of permit issuance. The total process throughput at the skinner saw, speciality/tongue/groove machine, and glue line shall be at least 180,000 sf/hr (3/8" basis) at the time of test. Failure to test at or above this level shall limit the permittee to operating within 10 percent above the tested rate.

SN-06, SN-06A, & SN-06B
Dryers

Source Description

Green veneer is dried in one of three indirect heated veneer dryers. The exhausts (SN-06) from the veneer dryers "hot zone" stacks containing VOC emissions will be controlled by a 4-canister Regenerative Thermal Oxidizer (RTO). The RTO utilizes natural gas in order to maintain the necessary temperatures in the combustion chamber.

Sources SN-06A & SN-06B account for the emissions from the veneer dryers' infeed vents and the cooling vents, respectively. No additional recordkeeping for these sources is necessary because their emissions are inherently limited by other requirements in this permit.

Specific Conditions

19.Pursuant to §19.501 et seq of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year emission rates are based on the throughput limit set forth in Specific Condition 21.

SN-#	Pollutant	lb/hr	tpy
06	PM_{10}	5.7	24.7
	SO_2	0.1	0.5
	VOC	10.9	47.4
	CO	8.7	38.1
	NO_X	4.3	18.8
06A	VOC	5.8	25.1
06B	PM_{10}	3.1	13.4
	VOC	9.7	42.6

20. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the HAP emission rates set forth in the following table. The pound per hour and ton per year emission rates are based on the throughput limit set forth in Specific Condition 21. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance.

Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

SN-#	Pollutant	lb/hr	tpy
06	PM	5.7	24.7
	Acetaldehyde	0.38	1.65
	Acrolein	0.02	0.10
	Benzene	0.01	0.04
	Formaldehyde	0.14	0.62
	MEK	0.11	0.49
	Methanol	1.18	5.15
	Toluene	0.38	1.65
06B	PM	3.1	13.4
	Acetaldehyde	0.19	0.82
	Formaldehyde	0.42	1.85
	Methanol	0.09	0.41

21. Pursuant to §18.501 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity at source SN-06 as measured by EPA Method 9.

22. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, weekly observations of the opacity from source SN-06 shall be conducted by personnel familiar with the permittee's visible emission. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with the specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.

    a. The date and time of the observation.
    b. If visible emissions which appeared to be above the permitted opacity were detected.

c. If visible emissions which appeared to be above the permitted opacity were detected, the cause of the exceedence of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted opacity after the corrective action was taken.

d. The name of the persons conducting the opacity observations.

23. Pursuant to Civil Action No. 1 96-CV-1818, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-3114, and 40 CFR 70.6, the permittee shall operate the regenerative thermal oxidizers in such a manner as to capture all VOC emissions from the "hot zone" stacks of the veneer dryers.

24. Pursuant to Civil Action No. 1 96-CV-1818, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-3114, and 40 CFR 70.6, the permittee shall achieve a minimum 90% destruction efficiency for the captured VOC emissions except as described in Specific Condition 25.

25. Pursuant to Civil Action No. 1 96-CV-1818, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-3114, and 40 CFR 70.6, the permittee need not maintain the required 90% destruction efficiency during periods when the dryers are not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts), and Force Majeure events (including malfunctions which qualify as Force Majeure events). These startup and shutdown periods shall not exceed the minimum amount of time necessary for these events. During these events, the permittee shall minimize emissions to the greatest extent practicable.

26. Pursuant to Civil Action No. 1 96-CV-1818, §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall, at the beginning of every month, record its maintenance schedule for that month. To the greatest practical extent, the permittee shall schedule startup and shutdown of control technology systems during times when process equipment is also shutdown for routine maintenance.

27. Pursuant to Civil Action No. 1 96-CV-1818, §19.702 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall test source SN-06 for VOC destruction efficiency no later than December 31, 2000, and every two years thereafter. The tests shall be conducted in accordance with Plantwide Condition 3 and in accordance with the testing protocol set forth in the Consent Decree. The results of the test shall be submitted to both the Department and the US EPA within thirty days of the test taking place.

28. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct a parametric monitoring program study, to commence no later than December 31, 1998, and to last no longer than 180 days, to establish the parameters needed to be controlled and monitored as well as the appropriate operating criteria to be maintained for each such parameter in order to ensure proper operation of the control technology system. This study shall establish for the affected units an appropriate relationship between two or more operational parameters and the required destruction efficiency in Specific Condition 24. The permittee shall include in the study the proposed process parameters to be monitored and the appropriate operating criteria. The permittee may use data gathered in studies for other facilities affected by the Consent Decree as approved by the EPA.

29. Pursuant to Civil Action No. 1 96-CV-1818, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall submit the results of the study required by Specific Condition 28 to the US EPA and to the Department for review and approval no later than six months from the date of the initial compliance testing required by Specific Condition 27. The study results have been submitted to the EPA but not yet approved as of the date of issuance of this permit.

30. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall have the necessary data recording equipment to implement the parametric monitoring program installed and operating or have established manual data record keeping procedures within 180 days of receiving the US EPA's approval of the parametric monitoring program.

31. Pursuant to Civil Action No. 1 96-CV-1818, §19.303 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall operate the regenerative thermal oxidizers and all parametric monitoring equipment within manufacturer's specifications.

32. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall begin monitoring and recording the parameters required by the parametric monitoring program within 180 days of receiving approval of the program from the US EPA.

33. Pursuant to Civil Action No. 1 96-CV-1818, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall

monitor and record each parameter at least once every 15 minutes and shall average the readings over a 12-hour period.

34. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall provide the US EPA and the Department with a summary of the parametric monitoring data in order to demonstrate compliance and which may be used for enforcement purposes. These records shall be updated daily, shall be kept on site, and shall be made available to Department personnel upon request.

35. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall calibrate or reevaluate the parametric monitoring devices based on the compliance demonstration tests required by Specific Condition 27. The permittee shall provide the US EPA and the Department with an annual report documenting its calibration or review of the parameters and proposed changes if necessary.

SN-103, SN-104, & SN-105
Plywood Production

Source Description

Glue is applied to the veneer on the glueline (SN-104) before and after the core strips are added to the veneer. Then the plywood is pressed under high temperature (325 °F) and pressure (200 psi) in one of four steam heated presses (SN-103). After the presses, the panels may be temporarily stored in the storage area (SN-105) before being trimmed at the skinner saw.

Specific Conditions

36. Pursuant to §19.501 et seq of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year emission rates are based on maximum capacity.

SN-#	Pollutant	lb/hr	tpy
103	PM_{10} VOC	1.8 11.0	7.9 50.0
104	VOC	0.1	0.3
105	VOC	5.7	25.0

37. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the HAP emission rates set forth in the following table. The pound per hour and ton per year emission rates are based on maximum capacity. The HAP emissions listed for this source were based upon published emission factors at the time of permit issuance. Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

SN-#	Pollutant	lb/hr	tpy
103	PM	1.8	7.9
	Acetaldehyde	0.39	1.70
	Formaldehyde	0.54	2.40
	MEK	0.20	0.90
	Methanol	3.00	13.0
	Toluene	0.19	0.80
	Phenols	8.40	37.0
104	Formaldehyde	0.01	0.10
	Methanol	0.18	0.80
105	Formaldehyde	0.54	2.40

38. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity at source SN-103 as measured by EPA Method 9.

39. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from SN-103 shall be conducted by personnel familiar with the permittee's visible emission. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with the specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.

    a. The date and time of the observation.
    b. If visible emissions which appeared to be above the permitted opacity were detected.
    c. If visible emissions which appeared to be above the permitted opacity were detected, the cause of the exceedence of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted opacity after the corrective action was taken.
    d. The name of the persons conducting the opacity observations.

SN-100
Debarking

Source Description

The incoming logs are unloaded in the log debarking and handling area. The debarkers (SN-100) remove the bark from the logs. The bark is mechanically conveyed to the hammer hog, where it is shredded before being conveyed to the fuel house.

Specific Conditions

40. Pursuant to §19.501 et seq of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year emission rates are based on maximum capacity.

SN-#	Pollutant	lb/hr	tpy
100	PM_{10}	1.2	5.4

41. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-100. These emission rates are based on the maximum capacity of the equipment.

SN-#	Pollutant	lb/hr	tpy
100	PM	2.7	12.0

42. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity at source SN-100 as measured by EPA Method 9.

43. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from SN-100 shall be conducted by personnel familiar with the permittee's visible emission. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted

opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with the specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.

a. The date and time of the observation.
b. If visible emissions which appeared to be above the permitted opacity were detected.
c. If visible emissions which appeared to be above the permitted opacity were detected, the cause of the exceedence of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted opacity after the corrective action was taken.
d. The name of the persons conducting the opacity observations.

SECTION V: COMPLIANCE PLAN AND SCHEDULE

The Georgia-Pacific Corporation - Plywood Facility is in compliance with the applicable regulations cited in the permit application. The facility will continue to operate in compliance with those identified regulatory provisions. The facility will meet any future regulations that may apply on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.

2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.

3. Pursuant to §19.702(E), 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Two copies of the compliance test results shall be submitted to the Department within thirty (30) days after the completed testing. The permittee shall provide:

   (1) Sampling ports adequate for applicable test methods
   (2) Safe sampling platforms
   (3) Safe access to sampling platforms
   (4) Utilities for sampling and testing equipment

4. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

5. Pursuant to Regulation #26 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

Title VI Provisions

6. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:

a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.

b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.

c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.

d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

7. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.

c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.

d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)

e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.

f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

8. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

9. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

   The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

10. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

Permit Shield

11. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:

    A. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated November 7, 1997.

Source No.	Regulation	Description
Facility	Arkansas Regulation 19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation 26	Regulations of the Arkansas Operating Air Permit Program

B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated November 7, 1997.

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
New Source Performance Standards for Small Industrial Commercial-Institutional Steam Generating Units	40 CFR 60 Subpart Db	SN-01	Boiler installed prior to the June 19, 1984-applicability date.

C. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

The liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance;

The applicable requirements of the acid rain program, consistent with section 408(a) of the Clean Air Act; or

The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

12. Pursuant to Regulation 26 and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated dated November 7, 1997.

The following organic liquid storage tanks less than or equal to 10,000 gallons and having a true vapor pressure less than or equal to 0.5 psia have aggregate less than 10 tpy (uncontrolled potential to emit basis) of any air contaminant.

Tank Identification	Contents
01	Waste Oil
02	Hydraulic Oil

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

1. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.

2. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.

3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

4. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.

5. Consumer use of office equipment and products, not including commercial printers or business primarily involved in photographic reproduction.

6. Janitorial services and consumer use of janitorial products.

7. Internal combustion engines used for landscaping purposes.

8. Laundry activities, except for dry-cleaning and steam boilers.

9. Bathroom/toilet emissions.

10. Emergency (backup) electrical generators at residential locations.

11. Tobacco smoking rooms and areas.

12. Blacksmith forges.

13. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.

14. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.[1]

15. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface-coating or products.

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[1] Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

16. Portable electrical generators that can be "moved by hand" from one location to another.[2]

17. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.

18. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.[3]

19. Air compressors and pneumatically operated equipment, including hand tools.

20. Batteries and battery charging stations, except at battery manufacturing plants.

21. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.[4]

22. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and no volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.

23. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.

24. Drop hammers or presses for forging or metalworking.

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[2] "Moved by hand" means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

[3] Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

[4] Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

25. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.

26. Vents from continuous emissions monitors and other analyzers.

27. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

28. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.

29. Lasers used only on metals and other materials which do not emit HAPs in the process.

30. Consumer use of paper trimmers/binders.

31. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.

32. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.

33. Laser trimmers using dust collection to prevent fugitive emissions.

34. Bench-scale laboratory equipment used for physical or chemical analysis not including lab fume hoods or vents.

35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.

36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.

37. Hydraulic and hydrostatic testing equipment.

38. Environmental chambers not using hazardous air pollutant gases.

39. Shock chambers, humidity chambers, and solar simulators.

40. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.

41. Process water filtration systems and demineralizers.

42. Demineralized water tanks and demineralizer vents.

43. Boiler water treatment operations, not including cooling towers.

44. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.

45. Oxygen scavenging (de-aeration) of water.

46. Ozone generators.

47. Fire suppression systems.

48. Emergency road flares.

49. Steam vents and safety relief valves.

50. Steam leaks.

51. Steam cleaning operations.

52. Steam and microwave sterilizers.

53. Site assessment work to characterize waste disposal or remediation sites.

54. Miscellaneous additions or upgrades of instrumentation.

55. Emissions from combustion controllers or combustion shutoff devices but not combustion units itself.

56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).

57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.

58. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.

59. Residential wood heaters, cookstoves, or fireplaces.

60. Barbecue equipment or outdoor fireplaces used in connection with any residence or recreation.

61. Log wetting areas and log flumes.

62. Periodic use of pressurized air for cleanup.

63. Solid waste dumpsters.

64. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.

65. Natural gas odoring activities unless the Department determines that emissions constitute air pollution.

66. Emissions from engine crankcase vents.

67. Storage tanks used for the temporary containment of materials resulting from an emergency reporting to an unanticipated release.

68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.

69. Mixers, blenders, roll mills, or calendars for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.

70. The storage , handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to the equipment only).

71. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.

72. Tall oil soap storage, skimming, and loading.

73. Water heaters used strictly for domestic (non-process) purposes.

74. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.

75. Agricultural operations, including onsite grain storage, not including IC engines or grain elevators.

76. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.

2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.

3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.

4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.

5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:

    a. The date, place as defined in this permit, and time of sampling or measurements;
    b. The date(s) analyses were performed;
    c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;
e. The results of such analyses; and
f. The operating conditions existing at the time of sampling or measurement.

6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Pollution Control and Ecology
Air Division
ATTN: Air Enforcement
Post Office Box 8913
Little Rock, AR 72219

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.6 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department within 24 hours of discovery of the occurrence. The initial report may be made by telephone and shall include:

a. The facility name and location,
b. The process unit or emission source which is deviating from the permit limit,
c. The permit limit, including the identification of pollutants, from which deviation occurs,
d. The date and time the deviation started,
e. The duration of the deviation,
f. The average emissions during the deviation,

g. The probable cause of such deviations,
h. Any corrective actions or preventive measures taken or being take to prevent such deviations in the future, and
i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) within 24 hours of discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A.§8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.

10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.

14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.

15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.

16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.

17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.

18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.

20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:

    a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
    d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.

21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:

    a. The identification of each term or condition of the permit that is the basis of the certification;
    b. The compliance status;
    c. Whether compliance was continuous or intermittent;
    d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
    e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.

22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

CERTIFICATE OF SERVICE

I, Keith A. Michaels, hereby certify that a copy of this permit has been mailed by first class mail to Georgia Pacific - Fordyce Plywood, P.O. Box 1060, Fordyce, Arkansas 71742, on this 25th day of August, 2000.

Keith A. Michaels, Chief, Air Division