

ADEQ OPERATING AIR PERMIT

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

Permit #: 1803-AOP-R1

IS ISSUED TO:

Georgia-Pacific Oriented Strandboard Facility
State Highway 274, Southeast of Fordyce
Fordyce, AR 71742
Calhoun County
CSN: 07-0212

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:

June 8, 1999

and

June 7, 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE: Georgia-Pacific Oriented Strandboard Facility
CSN: 07-0212
PERMIT NUMBER: 1803-AOP-R1

FACILITY ADDRESS: State Highway 274, Southeast of Fordyce
Fordyce, AR 71742

COUNTY: Calhoun

CONTACT NAME: Paul Vasquez
TELEPHONE NUMBER: (404) 652-7327

REVIEWING ENGINEER: Michael H. Watt

UTM North-South (X): Zone 15 3,735.9 km
UTM East-West (Y): Zone 15 558.6 km

Georgia-Pacific Oriented Strandboard Facility
Permit #: 1803-AOP-R1
CSN #: 07-0212

SECTION II: INTRODUCTION

In permit 1803-AOP-R0, Georgia-Pacific Corporation (GP) proposed to construct and operate an oriented strandboard (OSB) facility near Fordyce, Arkansas. This facility will have the capacity to produce 475 million square feet (MMSF), on a 3/8-inch basis, of OSB annually. This facility will include five dryers, a press, and associated materials handling equipment. The dryers and press will be controlled by three regenerative thermal oxidizers (RTOs). Two of the RTOs will be dedicated to the dryers and the third will control emissions from the press. Particulate matter emissions resulting from material handling will be controlled by a series of bag filters. This modification to the initial permit corrects the fugitive emission calculations and updates PSD modeling because of a change in stack parameters.

GP is considered a major stationary source under the Prevention of Significant Deterioration (PSD) Regulations. Emissions in this permit for PM/PM₁₀, VOC, CO, and NO_x are above the PSD significance levels. The emissions associated with this project and the significance levels are shown in the following table.

Plantwide Permitted Emissions (ton/yr)		
Pollutant	Air Permit 1803-AOP-R1	PSD Significance Level
PM	682.4	25
PM ₁₀	474.2	15
SO ₂	20.5	40
VOC	641.8	40
CO	179.0	100
NO _x	368.1	40

In addition to PSD Regulations, GP is also subject to Regulations of the Arkansas Operating Air Permit Program (Title V, Regulation #26), Regulations of the Arkansas Plan of Implementation for Air Pollution Control (SIP, Regulation #19), and Arkansas Air Pollution Control Code (Code, Regulation #18).

None of the emission sources at the facility are listed as covered under the New Source

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Performance Standards (NSPS). In a memorandum, dated November 17, 1992, the US EPA recognized that there are both similarities and differences between traditional steam generating units and process dryers. In this memorandum, the EPA concluded that NSPS Subparts Db and Dc do not apply to process dryers.

The EPA is currently identifying the Maximum Achievable Control Technology (MACT) for the building products sector, including standards for hazardous air pollutant sources at oriented strandboard plants. Those standards are expected to be promulgated in November 2000. As such, there are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) currently applicable for this type of facility.

Section 112(g) of the Clean Air Act requires that each newly constructed "major" emission source of hazardous air pollutants (HAPs) meets emission limits specified in the applicable 112(d) MACT standard or resulting case-by-case MACT determination when the 112(d) standard has not yet been promulgated for the specified source category. A major source of HAPs is defined as one that emits 10 tons per year or more of a single HAP or 25 tons per year or more of all HAPs combined. Formaldehyde emissions for this facility have been calculated to be less than 10 tons per year. As such, the facility is not subject to MACT review under 112(g).

PROCESS DESCRIPTION

Logs, resin, and wax are the primary raw materials used in OSB panel production. The production process is comprised of four principal manufacturing processes: (1) Furnish production, which includes debarking, slashing, and flaking; (2) Flake drying; (3) Forming and pressing; and (4) Finishing, which consists of sawing and sanding.

Furnish Production

Logs are unloaded and temporarily stored in the log yard. The logs are then cut to size, debarked, and processed into flakes. Bark from the debarkers and other green end material from the log yard is shipped off-site for use as wood fuel or for use in horticultural applications.

Flake Drying

The drying process consists of five horizontal, cylindrical rotary drum-type flake dryers heated by suspension-type burners, and a pneumatic system which conveys the flakes through the dryers. The suspension burners are designed to burn ground wood fuel. Raw wood fuel is first ground in the hammermill and then stored in a metering bin. From the metering bin, the ground wood fuel is pneumatically transferred and blown into the burner. Maximum heat input to each dryer is 40 million British thermal units per hour (MMBtu/hr). The wood fuel is introduced tangentially to

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the burners, creating a cyclonic flow pattern, thereby promoting combustion efficiency. The flue gases leaving the combustion zone are at approximately 1600 degrees Fahrenheit (EF), but are immediately cooled down to an approximate range of 600 to 1200EF by the addition of dilution air between the burner and the dryer. The hot exhaust from the burners combines with ambient air pulled through by the dryer's pneumatic system to dry the flakes. The amount of dilution air, and resulting gas temperature, are dependent on the dryer operating rate, wood moisture content, desired moisture content of the furnish, etc. Air pollutant emissions associated with the drying operation include products of wood fuel combustion, such as PM, VOCs, CO, NO_x, and SO₂. They also include additional PM, VOCs, CO, and formaldehyde, which are produced in the wood drying process.

Forming and Pressing

The dried wood flakes are blended with resin and wax, and are then placed as a mat on the forming line in layers, oriented at right angles, to provide structural integrity. The mat is then moved into the thermal-oil-heated press, where it is compressed and heated to bond the resin to the flakes. The thermal oil is heated to the appropriate temperature in a separate system, consisting of two, wood fuel, suspension-type burners. The exhaust gases from the burners are routed through the dryer system. Air pollutant emissions associated with the board press operation include PM, VOCs, CO, NO_x and formaldehyde.

Finishing

The pressed mats are cut to size, cooled, and the edges are sprayed with sealant to prevent swelling. The finished OSB is then packed and shipped off-site. Dry end material is either burned to heat the dryers and thermal oil system or shipped off-site for use as wood fuel or as furnish in other wood products manufacturing operations.

Numerous material handling operations, which represent both point sources and fugitive emission sources, are associated with the production of the OSB. Those operations that can be characterized as point sources include the screen fines with saw trim transfer pneumatics, saw trim and finishing line pneumatics, materials reject and flying saw pneumatics, specialty saw and sander pneumatics, fuel system pneumatics, forming bin pneumatics, and hammermill system pneumatics. Substantive pollutant emissions from these operations are limited to PM. The material handling operations responsible for fugitive emissions include the hog fuel truck dump, screen and storage equipment; the sawdust truck dump, screen and storage equipment and face reclaim hoppers; the chip truck dump, screen and storage equipment; and the core reclaim hoppers. PM is the only pollutant associated with these operations.

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PREVENTION OF SIGNIFICANT DETERIORATION

BACT Analysis

For a PSD permit, the applicant must perform a BACT analysis for each new unit or affected emission unit that is undergoing a physical change or change in method of operation. The BACT evaluation must address each pollutant subject to PSD review emitted by each unit. A separate “top-down” BACT analysis was conducted for each pollutant that is exceeding PSD significance levels.

The first step in the top-down approach is to identify all the emission control technologies for each pollutant. The second step is to eliminate all technically infeasible options. The third step is to rank all of the options in order of control effectiveness, emission reductions, energy impacts, environmental impacts, and economic impacts. This establishes a hierarchy to use when selecting a BACT.

GP has grouped the facility into three source categories to facilitate BACT review. These are Dryers (SN-01), Press (SN-02), and Material Handling Sources (SN-03 through SN-09).

Dryers

Seven different control options were available through the RBLC in which GP considered for use on Dryers (SN-01). These options included the following:

1. Regenerative thermal oxidation (RTO) with particulate matter control,
2. Regenerative catalytic oxidation (RCO) with particulate matter control,
3. Biofilter with particulate matter control,
4. Recycle system with indirect heat exchange and particulate matter control,
5. Wet electrostatic precipitation (wet ESP),
6. Wet Scrubbers, and
7. Selective catalytic reduction (SCR) for NO_x.

The first four options are capable of controlling VOC, PM and CO emissions. Biofilters have shown potential to control NO_x in a controlled environment. Wet ESPs are a PM control device with a limited potential for VOC control.

Of the options identified, some can be eliminated on the grounds of being technically infeasible. Biofiltration, selective catalytic reduction (SCR), and Dryer exhaust recycle all need temperatures maintained above the current exit temperatures to maintain reductions of emissions.

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The following table is a summary of the control options considered and the control effectiveness for each.

BACT Control Effectiveness for Dryers (SN-01) (Percent Removed)			
Pollutant	PM	CO	VOC
RTO/Multiclones	90.0%	75.0%	90.0%
RCO/Multiclones	80.0%	75.0%	90.0%
Wet ESP	80.0%	0.0%	5.0%
Wet Scrubbers	80.0%	0.0%	5.0%

The final step is to evaluate the most effective control or controls to employ.

Since RTO with multiclones represents the highest overall degree of control technology feasible, it is selected as BACT for PM, CO, and VOC emissions. A low-NO_x burner design, combined with fuel enhancement, is proposed for BACT for NO_x emissions exiting the RTO.

Press

Four different options were analyzed for use on the Press (SN-02). These options included the following:

1. RTO,
2. RCO,
3. Biofilter,
4. Wet ESP, and
5. Wet Scrubber.

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The following table is a summary of the control options considered and the control effectiveness of each.

BACT Control Effectiveness for the Press (SN-02) (Percent Removed)			
Pollutant	PM	CO	VOC
RTO	75.0%	75.0%	90.0%
RCO	75.0%	75.0%	90.0%
Biofilter	0.0%	50.0%	90.0%
Wet ESP	80.0%	0.0%	5.0%
Wet Scrubbers	80.0%	0.0%	5.0%

Since RTO represents the highest overall degree of control technology feasible (shown here as equal to RCO, the overall PM control values for RCO are likely over-estimated), it is selected as BACT for PM, CO, and VOC emissions. A low-NO_x burner design is proposed for BACT for NO_x.

Material Handling Sources

GP considered only one control option when analyzing the Material Handling. Bagfilter-type dust collectors are feasible for controlling emissions from all Material Handling sources. Other PM control methods, such as wet scrubbers or ESP's, although feasible, are not considered practical for these sources since they could not be any more effective and either create problems such as wastewater disposal (wet scrubbing systems) or are overly complex and energy intensive (ESP).

Bagfilter-type dust collectors are feasible for controlling emissions from all of the point sources. Other methods of control, such as wet scrubbers or ESPs are not considered practical for these sources since they could not be any more effective and either create problems such as waste water disposal or they are more energy intensive. The vendor guarantees removal efficiencies between 98.67 and 99.96% for PM at each various source.

Since a bagfilter-type dust collector represents the highest overall degree of control technology feasible, it is selected as BACT for PM.

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Class I Area Impact Analysis

PSD Regulations require that written notification be provided to the Federal Land Manager in the event that a major source or modification is located within 100 kilometers of a Class I Area. GP is not located within 100 kilometers from a Class I Area. Therefore, neither notification to the Federal Land Manager nor a Class I Area Impact Analysis is required by PSD Regulations.

The nearest PSD Class I Area to the proposed plant is the Caney Creek Wilderness Area, located at a distance of 151 km from the facility. Even though not required by the PSD Regulations, at the request of the Arkansas Department of Pollution Control & Ecology, an ambient impact modeling analysis for PM₁₀ and NO_x (the pollutants that underwent NAAQS modeling) was conducted for the Wilderness Area. The results of the analysis indicated that the proposed plant will not have an adverse impact on the Class I Area.

Class I Screening Analysis Results for PM₁₀		
Averaging Period	Maximum Concentration (µg/m³)	Screening Level (µg/m³)
Annual	0.0066	0.2
24-Hour	0.14	0.3

Class I Screening Analysis Results for NO_x		
Averaging Period	Maximum Concentration (µg/m³)	Screening Level (µg/m³)
Annual	0.0056	0.1

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Air Toxics Analysis

The facility emits formaldehyde from the dryers and the presses. In order to determine if these emissions pose a significant health risk to the general public, an analysis was performed using the procedures outlined in the ADEQ's Non-Criteria Pollutant Control Strategy (Revised 1996) and federal guidelines on air quality modeling. The Control Strategy contains procedures for estimating the Presumptively Acceptable Impact Levels (PAILs). PAILs are 1/100th of the Threshold Limit Value (TLV) for the pollutant emitted.

Air Toxics Analysis Results for Formaldehyde		
Averaging Period	Maximum Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Allowable Concentration ($\mu\text{g}/\text{m}^3$)
24-Hour	0.61	15.0

Preliminary Impact Analysis

A preliminary impact analysis was performed to determine if significance impacts occur and to define the impact area that they occur in. This information was then used as a basis for the NAAQS analysis and the PSD increment-consuming analysis.

At this facility, PM_{10} , CO, and NO_x emission rates exceed the PSD significant emission rate levels. Therefore, a significant impact analysis was performed for PM_{10} , CO, and NO_x to determine whether the emissions result in impacts in excess of the PSD modeling significance levels. The results were also compared to the EPA monitoring de minimis levels to determine if pre-construction monitoring is required.

Results indicated that PM_{10} impacts exceeded modeling and monitoring significance levels. NO_x impacts exceeded the modeling significance level, but did not exceed the monitoring significance level. CO emissions were below modeling and monitoring significance levels.

The maximum concentration results and the significance levels for PM_{10} , CO, and NO_x are included in the following tables.

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Significant Impact Analysis Modeling				
Pollutant	Maximum Concentration Results ($\mu\text{g}/\text{m}^3$)			
	Annual	24-Hour	8-Hour	1-Hour
PM ₁₀	5.84	35.4	-	-
CO	-	-	21.1	53.7
NO _x	1.10	-	-	-

Significant Impact Analysis Modeling				
Pollutant	Modeling Significance Levels ($\mu\text{g}/\text{m}^3$)			
	Annual	24-Hour	8-Hour	1-Hour
PM ₁₀	1.0	5.0	-	-
CO	-	-	500.0	2000.0
NO _x	1.0	-	-	-

Significant Impact Analysis Modeling				
Pollutant	Monitoring Significance Levels ($\mu\text{g}/\text{m}^3$)			
	Annual	24-Hour	8-Hour	1-Hour
PM ₁₀	-	10.0	-	-
CO	-	-	575.0	-
NO _x	14.0	-	-	-

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NAAQS Analysis

The NAAQS are the maximum concentrations, measured in terms of the total concentration of pollutant in the atmosphere. In the NAAQS analysis, GP’s emissions were combined with those from other nearby sources that have the potential to contribute significantly to the receptors within the radius of impact (ROI). This analysis was performed for PM₁₀ and NO_x. Source data on all permitted sources within 50 km of the impact areas was requested from the Arkansas Department of Pollution Control and Ecology.

The highest results of the NAAQS Analysis for PM₁₀ and NO_x are contained in the following tables.

NAAQS Analysis Results for PM₁₀				
Averaging Period	Maximum Concentration (µg/m³)	Background (µg/m³)	Total (µg/m³)	NAAQS (µg/m³)
Annual	10.0	25.00	35.00	50.0
24-Hour	67.1	57.00	124.1	150.0

NAAQS Analysis Results for NO_x				
Averaging Period	Concentration (µg/m³)	Background (µg/m³)	Total (µg/m³)	NAAQS (µg/m³)
Annual	3.86	21.00	24.86	100.0

PSD Increment Analysis

PSD Increment is the maximum allowable increase in concentration that is allowed to occur above a set baseline concentration for a specific pollutant. The baseline concentration is defined for each pollutant and averaging time. It is the ambient concentration existing at the time that the first complete PSD permit application is submitted for a distinct area. PSD minor source trigger dates have not been established.

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Increment consuming sources were obtained using the same methodology for the NAAQS Analysis. Permitted dates of sources in Arkansas were evaluated to determine if the source was increment-consuming or in the baseline.

Emissions increases and decreases for all increment-affected sources located within the baseline area are modeled along with the emissions from GP.

The facility constructed an overall increment model. In this model, all increment consuming sources within the ROI were modeled. This was then compared to the total increment available. The highest results of the Increment Analysis for PM₁₀ is contained in the following table.

Total Increment Analysis Results for PM₁₀			
Averaging Period	Maximum Modeled Increment Consumption (µg/m³)	Total Increment (µg/m³)	Percent of Increment Consumed
Annual	5.84	17.0	34.3%
24-Hour	29.9	30.0	99.6%

Total Increment Analysis Results for NO_x			
Averaging Period	Maximum Modeled Increment Consumption (µg/m³)	Total Increment (µg/m³)	Percent of Increment Consumed
Annual	1.10	25.0	4.4%

According to §19.9.4(c)(4) of Regulation #19, if issuance of a permit would result in the consumption of more than 80% of the short-term increment, the permittee shall submit an assessment of (a) the effects that the consumption would have upon the industrial and economic development within the area, and (b) alternatives to the consumption including alternative siting of the source or portions. The results of this analysis are included below.

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(a) The area where greater than 80% of the 24-hour PM_{10} increment consumed was found to be very localized, extending less than 100 meters to the north of the property line. Because of this limited area, no adverse impacts on industrial and economic developments are expected.

In addition, the sources that contribute the most to the increment consumption are fugitives such as haul roads, stock piles, and material handling processes. The existing dispersion model tends to over-estimate impacts from ground-level fugitive sources.

(b) It would not be feasible to consider an alternative site to this facility. The facility is a new facility and the emissions would be the same wherever it is located. The proposed location is in an area that will have a limited impact on growth.

In summary, it has been determined that the primary sources contributing to the off-property impacts are ground-level fugitive sources and that the extent of the area exceeding 80% of the increment is limited.

Air Quality Monitoring

The modeling information as indicated in the Preliminary Impact Analysis (page 11) was also compared to monitoring de minimis concentrations to see if the facility would need to conduct pre-construction ambient air quality monitoring and post-construction ambient air quality monitoring. The facility will need pre-construction monitoring data for PM_{10} emissions. In lieu of pre-construction monitoring, the Department has accepted use of existing data from a PM_{10} monitor located in El Dorado because of its close proximity to the facility. The PM_{10} background concentrations were established using 1996 monitoring data to be $25 \mu\text{g}/\text{m}^3$ for the annual averaging period and $57 \mu\text{g}/\text{m}^3$ for the 24-hour averaging period. This monitor will also be used for post-construction modeling to demonstrate compliance with the NAAQS.

Additional Impacts Review

An additional impacts analysis, addressing the potential impacts on visibility in the nearest Class I Area, was performed. The analysis demonstrates that the increase in impacts due to the facility is extremely low. Regardless of the existing conditions in the vicinity of the site or in the Class I Area, the proposed project will not cause any significant adverse effects.

The secondary NAAQS are designed to protect soils and vegetation. As discussed above, the proposed project will neither cause or contribute to a violation of the NAAQS. As such, no adverse impact on soils or vegetation is predicted.

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A Level I visibility screening analysis was conducted following the procedures outlined in “Workbook for Estimating Visibility Impairment” (EPA, 1980). The Level I screening analysis is designed to provide a conservative estimate of plume visual impacts (i.e., impacts higher than expected). The EPA model VISCREEN was utilized for the analysis. PM₁₀ and NO_x emissions used for the calculations are based upon the total estimated emissions from the facility. The maximum visual impacts caused by the facility do not exceed the screening criteria inside or near the Class I Area.

Facility Emission Summary

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table.

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	156.0	682.4	
		PM ₁₀	109.5	474.2	
		SO ₂	4.7	20.5	
		VOC	146.5	641.8	
		CO	40.9	179.0	
		NO _x	84.0	368.1	
		Formaldehyde	2.29	9.85	
01	Dryers	PM	74.5	326.1	20
		PM ₁₀	74.5	326.1	
		SO ₂	4.7	20.5	
		VOC	126.3	553.0	
		CO	33.6	147.2	
		NO _x	73.3	321.1	
		Formaldehyde	1.85	8.10	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
02	Press	PM	2.8	12.4	23
		PM ₁₀	2.8	12.4	
		VOC	20.0	87.9	
		CO	7.3	31.8	
		NO _x	10.7	47.0	
		Formaldehyde	0.24	1.05	
03	Screen Fines with Saw Trim Transfer	PM	2.1	9.2	26
		PM ₁₀	2.1	9.2	
04	Saw Trim/Finishing Line	PM	2.7	11.6	28
		PM ₁₀	2.7	11.6	
05	Mat Reject/Flying Saw	PM	3.2	13.8	30
		PM ₁₀	3.2	13.8	
06	Specialty Saw/Sander	PM	2.2	9.5	32
		PM ₁₀	2.2	9.5	
07	Fuel System	PM	0.4	1.5	34
		PM ₁₀	0.4	1.5	
08	Forming Bins	PM	1.3	5.6	36
		PM ₁₀	1.3	5.6	
09	Hammermill System	PM	2.1	9.2	38
		PM ₁₀	2.1	9.2	
10	Fugitive Emissions	PM	64.7	283.6	40
		PM ₁₀	17.2	75.4	
		VOC	0.2	0.9	
		Formaldehyde	0.20	0.70	

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SECTION III: PERMIT HISTORY

Permit 1803-AOP-R0 was issued to Georgia Pacific Oriented Strandboard Facility on June 8, 1999. This was the initial permit for this facility and allowed for construction to commence. This permit was PSD for PM/PM₁₀, VOC, CO, and NO_x.

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SECTION IV: EMISSION UNIT INFORMATION

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SN-01
Dryers

Source Description

This source consists of five flake dryers. Each dryer is a horizontal, cylindrical rotary drum heated by suspension-type burners and a pneumatic system which conveys the flakes through the dryers. The burners burn ground wood fuel from the hammermill. Each dryer has a maximum heat input of 40 million BTU per hour. BACT for this source has been determined to be a shared system of multiclones followed by regenerative thermal oxidators (RTOs).

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation #19) effective February 15, 1999, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #5, maximum equipment throughput, and proper operation of the RTO and multiclones. Compliance assurance monitoring shall be demonstrated by Plantwide Conditions #6 through #11.

Pollutant	lb/hr	tpy
PM	74.5	326.1
PM ₁₀	74.5	326.1
SO ₂	4.7	20.5
VOC	126.3	553.0
CO	33.6	147.2
NO _x	73.3	321.1

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2. Pursuant to 18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #5, maximum equipment throughput, and proper operation of the RTO and multiclones. Compliance assurance monitoring shall be demonstrated by Plantwide Conditions #6 through #11.

Pollutant	lb/hr	tpy
Formaldehyde	1.85	8.10

3. 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 cause to be discharged to the atmosphere gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.
4. Pursuant to §18.1004 of the 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 SN-01 shall be conducted by personnel familiar with the permittee’s visible emissions. 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. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, 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 limit were detected
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

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5. Pursuant to §19.702 of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall test one RTO in SN-01 each year for PM₁₀, NO_x, CO, and VOC emissions using EPA Reference Methods 5, 7E, 10, and 25A respectively, and for opacity using EPA Reference Method 9. These tests shall be performed simultaneously. While performing the tests, the dryer shall be operating at least 90% of the maximum throughput rate. If testing is conducted at a rate lower than 90%, the facility shall be limited to an operating rate of 110% of the tested rate until compliance at a higher rate is demonstrated. The permittee shall submit a written testing protocol to the Compliance Section Manager at least 15 days prior to any scheduled test.

6. Pursuant to §18.1002 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall test one RTO in SN-01 each year for Formaldehyde emissions using the Acetylacetone Method. While performing the test, the dryer shall be operating at least 90% of the maximum throughput rate. If testing is conducted at a rate lower than 90%, the facility shall be limited to an operating rate of 110% of the tested rate until compliance at a higher rate is demonstrated. The permittee shall submit a written testing protocol to the Compliance Section Manager at least 15 days prior to any scheduled test.

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SN-02
Press

Source Description

In the press, dried wood flakes are blended with resin and wax, and are then placed as a mat on the forming line in layers, oriented at right angles, to provide structural integrity. The mat is then moved into the thermal-oil-heated press, where it is compressed and heated to bond the resin to the flakes. The thermal oil is heated to the appropriate temperature in a separate system, consisting of two, wood fuel, suspension-type burners. The exhaust gases from the burners are routed through the dryer system. Air pollutant emissions associated with the board press operation include PM, VOCs, CO, NO_x and formaldehyde.

Specific Conditions

7. Pursuant to §19.501 et seq of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #10.d, maximum equipment throughput, and proper operation of the RTO and multiclones. Compliance assurance monitoring shall be demonstrated by Plantwide Conditions #6 through #11.

Pollutant	lb/hr	tpy
PM	2.8	12.4
PM ₁₀	2.8	12.4
VOC	20.0	87.9
CO	7.3	31.8
NO _x	10.7	47.0

8. Pursuant to 18.801 of Regulation #18, the permittee shall not exceed the emission rates set

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forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #10.d, maximum equipment throughput, and proper operation of the RTO and multiclones. Compliance assurance monitoring shall be demonstrated by Plantwide Conditions #6 through #11.

Pollutant	lb/hr	tpy
Formaldehyde	0.24	1.05

9. 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 cause to be discharged to the atmosphere gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.

10. Pursuant to §18.1004 of the 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 SN-02 shall be conducted by personnel familiar with the permittee’s visible emissions. 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. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, 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 limit were detected
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

11. Pursuant to §19.702 of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall test the RTO in SN-02 each year for PM₁₀, NO_x, CO, and VOC emissions

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using EPA Reference Methods 5, 7E, 10, and 25A respectively, and for opacity using EPA Reference Method 9. These tests shall be performed simultaneously. While performing the tests, the press shall be operating at least 90% of the maximum throughput rate. If testing is conducted at a rate lower than 90%, the facility shall be limited to an operating rate of 110% of the tested rate until compliance at a higher rate is demonstrated. The permittee shall submit a written testing protocol to the Compliance Section Manager at least 15 days prior to any scheduled test.

12. Pursuant to §18.1002 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall test the RTO in SN-02 each year for Formaldehyde emissions using the Acetylacetone Method. While performing the test, the press shall be operating at least 90% of the maximum throughput rate. If testing is conducted at a rate lower than 90%, the facility shall be limited to an operating rate of 110% of the tested rate until compliance at a higher rate is demonstrated. The permittee shall submit a written testing protocol to the Compliance Section Manager at least 15 days prior to any scheduled test.

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SN-03
Screen Fines/Saw Trim Transfer Pneumatics

Source Description

The pressed mats are cut to size, cooled, and the edges are sprayed with sealant to prevent swelling. Dry end material is either burned to heat the dryers and thermal oil system or shipped off-site for use as wood fuel or as furnish in other wood products manufacturing operations.

Specific Conditions

13. Pursuant to §19.501 et seq of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by maximum equipment throughput and proper operation of the bagfilters.

Pollutant	lb/hr	tpy
PM	2.1	9.2
PM ₁₀	2.1	9.2

14. 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 cause to be discharged to the atmosphere gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.

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15. Pursuant to §18.1004 of the 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 SN-03 shall be conducted by personnel familiar with the permittee's visible emissions. 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. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, 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 limit were detected
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

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SN-04
Saw Trim/Finishing Line Pneumatics

Source Description

The pressed mats are cut to size, cooled, and the edges are sprayed with sealant to prevent swelling. Dry end material is either burned to heat the dryers and thermal oil system or shipped off-site for use as wood fuel or as furnish in other wood products manufacturing operations.

Specific Conditions

16. Pursuant to §19.501 et seq of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by maximum equipment throughput and proper operation of the bagfilters.

Pollutant	lb/hr	tpy
PM	2.7	11.6
PM ₁₀	2.7	11.6

17. 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 cause to be discharged to the atmosphere gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.

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18. Pursuant to §18.1004 of the 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 SN-04 shall be conducted by personnel familiar with the permittee's visible emissions. 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. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, 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 limit were detected
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

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SN-05
Mat Reject/Flying Saw pneumatics

Source Description

The pressed mats are cut to size, cooled, and the edges are sprayed with sealant to prevent swelling. Dry end material is either burned to heat the dryers and thermal oil system or shipped off-site for use as wood fuel or as furnish in other wood products manufacturing operations.

Specific Conditions

19. Pursuant to §19.501 et seq of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by maximum equipment throughput and proper operation of the bagfilters.

Pollutant	lb/hr	tpy
PM	3.2	13.8
PM ₁₀	3.2	13.8

20. 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 cause to be discharged to the atmosphere gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.

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21. Pursuant to §18.1004 of the 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 SN-05 shall be conducted by personnel familiar with the permittee's visible emissions. 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. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, 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 limit were detected
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

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SN-06
Specialty Saw/Sander Pneumatics

Source Description

The pressed mats are cut to size, cooled, and the edges are sprayed with sealant to prevent swelling. Dry end material is either burned to heat the dryers and thermal oil system or shipped off-site for use as wood fuel or as furnish in other wood products manufacturing operations.

Specific Conditions

22. Pursuant to §19.501 et seq of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by maximum equipment throughput and proper operation of the bagfilters.

Pollutant	lb/hr	tpy
PM	2.2	9.5
PM ₁₀	2.2	9.5

23. 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 cause to be discharged to the atmosphere gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.

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24. Pursuant to §18.1004 of the 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 SN-06 shall be conducted by personnel familiar with the permittee's visible emissions. 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. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, 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 limit were detected
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

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SN-07
Fuel System Pneumatics

Source Description

The pressed mats are cut to size, cooled, and the edges are sprayed with sealant to prevent swelling. Dry end material is either burned to heat the dryers and thermal oil system or shipped off-site for use as wood fuel or as furnish in other wood products manufacturing operations.

Specific Conditions

25. Pursuant to §19.501 et seq of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by maximum equipment throughput and proper operation of the bagfilters.

Pollutant	lb/hr	tpy
PM	0.4	1.5
PM ₁₀	0.4	1.5

26. 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 cause to be discharged to the atmosphere gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.

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27. Pursuant to §18.1004 of the 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 SN-07 shall be conducted by personnel familiar with the permittee's visible emissions. 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. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, 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 limit were detected
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

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SN-08
Forming Bins Pneumatics

Source Description

The pressed mats are cut to size, cooled, and the edges are sprayed with sealant to prevent swelling. Dry end material is either burned to heat the dryers and thermal oil system or shipped off-site for use as wood fuel or as furnish in other wood products manufacturing operations.

Specific Conditions

28. Pursuant to §19.501 et seq of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by maximum equipment throughput and proper operation of the bagfilters.

Pollutant	lb/hr	tpy
PM	1.3	5.6
PM ₁₀	1.3	5.6

29. 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 cause to be discharged to the atmosphere gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.

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30. Pursuant to §18.1004 of the 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 SN-08 shall be conducted by personnel familiar with the permittee's visible emissions. 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. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, 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 limit were detected
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

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SN-09
Hammermill System Pneumatics

Source Description

The pressed mats are cut to size, cooled, and the edges are sprayed with sealant to prevent swelling. Dry end material is either burned to heat the dryers and thermal oil system or shipped off-site for use as wood fuel or as furnish in other wood products manufacturing operations.

Specific Conditions

31. Pursuant to §19.501 et seq of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by maximum equipment throughput and proper operation of the bagfilters.

Pollutant	lb/hr	tpy
PM	2.1	9.2
PM ₁₀	2.1	9.2

32. 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 cause to be discharged to the atmosphere gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.

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33. Pursuant to §18.1004 of the 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 SN-09 shall be conducted by personnel familiar with the permittee's visible emissions. 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. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, 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 limit were detected
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

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SN-10
Fugitive Emission Sources

Source Description

The material handling operations responsible for fugitive emissions include Debarker (PM), Bark Hog (PM), Blend House (VOC/HCHO), Finished Product Storage (VOC/HCHO), Edge Sealing of boards outside Spray Booth (PM), Resin Storage Tanks (VOC/HCHO), Paved Roads (PM), Unpaved Roads (PM), and Outside Bark Storage Area (PM).

Specific Conditions

34. Pursuant to §19.501 et seq of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by maximum equipment throughput and proper operating practices.

Pollutant	lb/hr	tpy
PM	64.7	283.6
PM ₁₀	17.2	75.4
VOC	0.2	0.9

35. Pursuant to 18.801 of Regulation #18, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by maximum equipment throughput and proper operating practices.

Pollutant	lb/hr	tpy
Formaldehyde	0.20	0.70

36. 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 cause to be discharged to the atmosphere gases which exhibit an opacity greater than 20%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.

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37. Pursuant to §19.7 of the Regulation #19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from the Debarker and Bark Hog shall be conducted by personnel familiar with the permittee's visible emissions. 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. If opacity is still greater than permit limits, a full Method 9 reading is required. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, 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 limit were detected
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Georgia-Pacific Oriented Strandboard Facility is in compliance with the applicable regulations cited in the permit application. Georgia-Pacific Oriented Strandboard Facility will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to Section 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 Section 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 Section 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 Section 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 Section 19.303 of Regulation 19, 19.901 et seq, and 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the RTOs shall be operated at the minimum temperature set point as determined during the compliance test.

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6. Pursuant to §19.705 of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall maintain continuous records which demonstrate compliance with Plantwide Condition #5. Readings will be recorded every 15 minutes and averaged every 12 hours. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes.
7. Pursuant to Section 19.303 of Regulation 19, 19.901 et seq, and 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the RTOs shall have a maximum volumetric flow rate of 120% of the maximum air flow established during the compliance test.
8. Pursuant to §19.705 of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall maintain continuous records which demonstrate compliance with Plantwide Condition #7. Readings will be recorded every 15 minutes and averaged every 12 hours. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes.
9. Pursuant to §19.705 of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall maintain continuous records of the static pressure at the inlet of each ID fan. Readings will be recorded hourly and averaged every 12 hours. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes.
10. Pursuant to §19.705 of Regulation #19, 19.901 et seq, and 40 CFR Part 52, Subpart E, the permittee shall maintain continuous records of the isolation damper position status. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes.

Title VI Provisions

11. 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.

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- 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.
12. 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.
13. 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.
14. If the permittee performs a service on motor (fleet) vehicles when this service involves

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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.

15. 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

16. 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 June 1998.

Source No.	Regulation	Description
Facility	Arkansas Regulation #19	Regulations of the Arkansas Plan of Implementation 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 June 1998.

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Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
New Source Performance Standards	40 CFR Part 60, Subpart Db	SN-01	In a memorandum, dated November 17, 1992, the US EPA EPA concluded that NSPS Subparts Db and Dc do not apply to process dryers.
New Source Performance Standards	40 CFR Part 60, Subpart Dc	SN-01	In a memorandum, dated November 17, 1992, the US EPA EPA concluded that NSPS Subparts Db and Dc do not apply to process dryers.

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.

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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 June, 1998.

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.

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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.
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.

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.

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.

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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.
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.

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.

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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.

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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.
34. 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.

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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.

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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;

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- 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 Section 19.601 and 19.602 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,

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- 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

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- 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.

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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;

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- 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.

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

AIR DIVISION
INVOICE REQUEST FORM

(9-96)

Facility Name & Address:

Georgia-Pacific Oriented Strandboard Facility
133 Peachtree Street NE, 17th Floor
Atlanta, GA 30303

CSN: 07-0212

Permit No: 1803-AOP-R1

Permit Description:

(e.g. A = AIR CODE, S=SIP, H=NESHAP, P=PSD, N=NSPS, T5= Title V)
P T5

Initial Fee Calculations:

Title V = 3(18.08)(TPY each pollutant, except CO) - amount of last annual air permit fee

NOTE: Do Not double count HAPs and VOCs!!!
No greater than 4000 tpy per pollutant or less than \$1000

Mod Fee Calculations:

Title V = 3 (18.08)(TPY increase of each pollutant, except CO)

NOTE: Do Not double count HAPs and VOCs!!!
No greater than 4000 tpy for each contaminant but not less than \$1000

F =

Fee Amount: \$

Engineer: Michael H. Watt

Date: October 8, 2001

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Pollution Control and Ecology gives the following notice:

Georgia-Pacific Corporation (GP) proposes to construct and operate an oriented strandboard (OSB) facility on State Highway 274, Fordyce, Arkansas. This facility will have the capacity to produce 475 million square feet (MMSF), on a 3/8-inch basis, of OSB annually. This facility will include five dryers, a press, and associated materials handling equipment. The dryers and press will be controlled by three regenerative thermal oxidizers (RTOs). Two of the RTOs will be dedicated to the dryers and the third will control emissions from the press. Particulate matter emissions resulting from material handling will be controlled by a series of bag filters. This modification corrects the fugitive emission calculations and updates PSD modeling because of a change in stack diameters.

GP is considered a major stationary source under the Prevention of Significant Deterioration (PSD) Regulations. Increases in emissions in this permit for PM/PM₁₀, SO₂, VOC, CO, and NO_x are above the PSD significance levels. Permit 1803-AOP-R1 is the first operating permit for GP under Regulation #26. In addition to PSD Regulations, GP is also subject to Regulations of the Arkansas Operating Air Permit Program (Title V, Regulation #26), Regulations of the Arkansas Plan of Implementation for Air Pollution Control (SIP, Regulation #19), and Arkansas Air Pollution Control Code (Code, Regulation #18).

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp, Information Officer. Citizens desiring technical information concerning the application or permit should contact Michael H. Watt, Engineer. Both Rhonda Sharp and Michael H. Watt can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Watson Memorial Library, University of Arkansas at Pine Bluff, Pine Bluff, Arkansas 71601. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special

conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this
Randall Mathis
Director