

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1803-AOP-R11 AFIN: 07-00212

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Georgia-Pacific Wood Products, LLC ( Fordyce OSB)  
#1 Georgia-Pacific Road  
Fordyce, Arkansas 71742

3. PERMIT WRITER:

Alexander Sudibjo

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Reconstituted Wood Product Manufacturing  
NAICS Code: 321219

5. SUBMITTALS:

5/8/2013

6. REVIEWER'S NOTES:

With this modification, the facility is requesting the following changes:

1. Replace the 40 MMBtu natural gas backup burner on all five dryers (SN-01) with two 16.5 MMBtu natural gas burner per dryer.
2. Add a new ink jet printing system to SN-11. Ink usage will not change therefore the facility does not request an emission increase.
3. Update emission limit for the Stencil/Nail Line/Marking/Logo/Edge Seal Application bubble (SN-11) due to an incorrect calculation used in the past.
4. Update emission limit for the Paved and Unpaved Roads (SN-12) based on the latest AP-42 revision, site-specific silt content, and updated vehicle miles traveled.

The facility's permitted annual emission is increasing by 1.1 tpy SO<sub>2</sub>.

7. COMPLIANCE STATUS:

As of May 8, 2013, there are no compliance issues with the facility.

Permit #: 1803-AOP-R11

AFIN: 07-00212

Page 2 of 16

8. PSD APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

b) Is the facility categorized as a major source for PSD? Y

- Single pollutant  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list, or
- $CO_2e$  potential to emit  $\geq 100,000$  tpy and  $\geq 100$  tpy  $\geq 250$  tpy of combined GHGs?

If yes, explain why this permit modification is not PSD.

The actual to potential emissions increases are less than PSD significance level.

9. GHG MAJOR SOURCE (TITLE V):

Indicate one:

- Facility is classified as a major source for GHG and the permit includes this designation
- Facility does not have the physical potential to be a major GHG source
- Facility has restrictions on GHG or throughput rates that limit facility to a minor GHG source. Describe these restrictions: \_\_\_\_\_

10. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	PM/PM <sub>10</sub> , VOC, CO and NO <sub>x</sub>	PSD
Facility	HAPs	NESHAP Subpart DDDD
15	HAPs	NESHAP Subpart QQQQ
17	HAPs	NESHAP Subpart ZZZZ

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

a) NAAQS:

NAAQS modeling was not required for the issuance of Permit #1803-AOP-R11 because there are no increases in PM<sub>10</sub>, SO<sub>2</sub>, CO, or NO<sub>x</sub> emissions. Modeling information was taken from Permit #1803-AOP-R7.

Pollutant	Emission Rate (lb/hr)	NAAQS Standard ( $\mu\text{g}/\text{m}^3$ )	Averaging Time	Highest Concentration ( $\mu\text{g}/\text{m}^3$ )	% of NAAQS
PM <sub>10</sub>	136.8	150	24-Hour	133	88.7
SO <sub>2</sub>	11.2	80	Annual	0.09	0.12
		1300	3-Hour	1.75	0.14
		365	24-Hour	0.58	0.16
CO	226.0	10,000	8-Hour	137.12	1.37
		40,000	1-Hour	267.35	0.67
NO <sub>x</sub>	143.9	100	Annual	7.54	7.54

\*North Little Rock background values 2008 were used, since there are few PM<sub>10</sub> monitors in Arkansas, the monitors from the urban areas (Little Rock) overestimate the background conditions in rural areas. The facility originally requested to use a 3-year average since attainment/nonattainment is determined on that basis. Background value averaging will not be allowed since it is not appropriate, per Thomas Rheume 07/31/2009.

b) Non-Criteria Pollutants:

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value ( $\text{mg}/\text{m}^3$ ), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV ( $\text{mg}/\text{m}^3$ )	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Acetaldehyde	45.04	4.9544	8.01	N
Acrolein	0.23	0.0253	1.95	N
Benzene	1.60	0.176	0.56	N
Cadmium	0.002	0.0002	0.03	N
Formaldehyde	15	1.65	7.15	N
Hexane	176.24	19.3864	0.74	Y

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Methanol	262.09	28.8299	16.64	Y
Phenol	19.25	2.1175	2.71	N
POM	0.20	0.022	0.02	Y
Propionaldehyde	47.53	5.2283	0.72	Y
Styrene	85.202	9.372	0.05	Y
Toluene	75.362	8.290	0.31	Y
Arsenic	0.01	0.0011	5.29e-3	N
Beryllium	5.0e-5	5.5e-6	2.64e-4	N
Chromium, hexavalent	0.01	0.0011	8.40e-4	Y
Manganese	0.2	0.022	0.39	N
Mercury	0.01	0.0011	8.55e-4	Y
Vinyl Acetate	35.21	3.8731	1.24	Y
Acetone	1187.12	130.5832	1.40	Y
Ammonia	17.41	1.915	1.30	Y

2<sup>nd</sup> Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL (µg/m <sup>3</sup> ) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m <sup>3</sup> )	Pass?
Acetaldehyde	450.41	43.1	Y
Acrolein	2.3	0.15	Y
Benzene	15.98	0.04	Y
Cadmium	0.02	0.0073	Y

Pollutant	PAIL ( $\mu\text{g}/\text{m}^3$ ) = 1/100 of Threshold Limit Value	Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	Pass?
Formaldehyde	15.0*	10.528	Y
Phenol	192.5	0.559	Y
Arsenic	0.1	0.00041	Y
Beryllium	5.0e-4	2.0e-5	Y
Manganese	2.0	0.03	Y

\*Surrogate screening value adopted by ADEQ (Steve Patrick memo of 10/19/1998).

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01 OSB 5 Dryers	NCASI January 2011 Wood Products Database	<u>Units in lb/ODT</u> CPM: 0.078 SO <sub>2</sub> : 0.019  Acetaldehyde: 0.084 Acetone: 0.011 Acrolein: 0.023 Benzene: 0.0052 Cadmium: 4.44e-6 Chromium: 9.34e-5 Manganese: 7.56e-5 Methanol: 0.056 Phenol: 0.0247 Propionaldehyde: 0.0090 Toluene: 0.0036	2 RTOs & multiclones	85% (PM/PM <sub>10</sub> )	600 MMSF/yr production
	Maximum of 2004 and 2008 stack tests	FPM/FPM <sub>10</sub> : 0.643 lb/ODT NO <sub>x</sub> : 0.854 lb/ODT CO: 1.6 lb/ODT  Formaldehyde: 0.051 lb/ODT		90% (VOC)	158,700 oven-dried flakes (OD) lb/hr
01 Natural Gas Emissions	AP-42, Table 1.4-2	0.6 lb/MMscf SO <sub>2</sub>		40% (CO)	1,390,018,000 OD lb/yr
	AP-42, Table 1.4-3	2.1E-03 lb/MMscf Benzene 7.5E-02 lb/MMscf CH <sub>2</sub> O		90% (HAPs)	33 MMBtu/hr Natural Gas dryers

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		1.8 lb/MMscf Hexane			
	AP-42, Table 1.4-4	1.1E-03 lb/MMscf Cadmium			
01 Wood Residuals	AP-42, 1.6	<u>Units in lb/MMBtu</u> PM/PM <sub>10</sub> : 0.56 NO <sub>x</sub> : 0.22 SO <sub>2</sub> : 0.025 CO: 0.60 VOC: 0.039  Acetaldehyde: 8.3e-4 Acetone: 1.9e-4 Acrolein: 4.0e-3 Benzene: 4.2e-3 Formaldehyde: 4.4e-3 Phenol: 5.1e-5 Propionaldehyde: 6.1e-5 Styrene: 1.9e-3 Toluene: 9.2e-4 Arsenic: 2.2e-5 Beryllium: 1.1e-6 Cadmium: 4.1e-6 Chromium, hexavalent: 3.5e-6 Manganese: 1.6e-3 Mercury: 3.5e-6			
01A	AP-42, Table 1.4-1	100 lb/MMscf NO <sub>x</sub> 84 lb/MMscf CO	None	N/A	N/A
	AP-42, Table 1.4-2	7.6 lb/MMscf PM/PM <sub>10</sub> 0.6 lb/MMscf SO <sub>2</sub> 5.5 lb/MMscf VOC			
	AP-42, Table 1.4-3	2.1E-03 lb/MMscf Benzene 7.5E-02 lb/MMscf CH <sub>2</sub> O 1.8 lb/MMscf Hexane			
	AP-42, Table 1.4-4	1.1E-03 lb/MMscf Cadmium			
02 OSB Press	AP-42, Table 10.6.1-4	0.11 lb/MSF PM/PM <sub>10</sub>	Multiclones RTO/TCO	75% (PM)	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	AP-42, Table 10.6.1-5	0.0014 lb/MSF NO <sub>x</sub> 0.0026 lb/MSF CO		90% (VOC)	@8,760 hrs/yr  Maximum Annual OSB Throughput = 600,000 million SF/yr
	AP-42, Table 10.6.1-6	0.21 lb/MSF VOC 0.0052 lb/MSF Acetaldehyde 0.0035 lb/MSF Acetone 0.044 lb/MSF CH <sub>2</sub> O 0.50 lb/MSF Methanol 0.072 lb/MSF Phenol		75% (CO)	
02 RTO (Natural Gas)	AP-42, Table 1.4-1	100 lb/MMscf NO <sub>x</sub> 84 lb/MMscf CO			Maximum Hourly Throughput = 77,200 SF/hr = 77.2 MSF/hr  Safety Factor = 1.2 for OSB press and OSB RTO  Press RTO – 12 MMBTU/hr = 0.0118 MMscf/hr
	AP-42, Table 1.4-2	7.6 lb/MMscf PM/PM <sub>10</sub> 0.6 lb/MMscf SO <sub>2</sub> 5.5 lb/MMscf VOC			
	AP-42, Table 1.4-3	2.1E-03 lb/MMscf Benzene 7.5E-02 lb/MMscf CH <sub>2</sub> O 1.8 lb/MMscf Hexane			
	AP-42, Table 1.4-4	1.1E-03 lb/MMscf Cadmium			
03	Air Flow	13,623 dscfm 0.01 grains/dscf	Receiver	80.00% for PM/PM <sub>10</sub>	Screen Fines/ Saw Trim Transfer Pnuematics Calculations were provided for both Throughput and Air flow/Grain loading. The maximum emissions were used.
	Throughput	145,208 tpy 33,152 lb/hr 77.2 MSF/hr			
	AP-42, Table 10.6.1-7 (03/2002) Raw Fuel Bin	0.06 lb/MSF VOC 0.0003 lb/MSF CH <sub>2</sub> O 0.0015 lb/MSF Acetone 0.0015 lb/MSF Methanol	Bag Filter	99.96% for PM/PM <sub>10</sub>	
04	Throughput	6,203 lb/hr	Receiver	80.00% for PM/PM <sub>10</sub>	
			Bag Filter	99.83% for PM/PM <sub>10</sub>	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
05	Air flow/ Grain loading	33,800 dscfm 0.01 grain/dscf	Receiver  Bag Filter	80.00% for PM/PM <sub>10</sub>  99.83% for PM/PM <sub>10</sub>	@8,760 hrs/yr Safety Factor 1.2
06	Air flow/ Grain loading	15,175 dscfm 0.01 grain/dscf	Receiver	80.00% for PM/PM <sub>10</sub>	
	Throughput	23,315 tpy 5,323 lbs/hr 77.2 MSF/hr		99.88% for PM/PM <sub>10</sub>	
07	AP-42, Table 10.6.1-7 (03/2002) Sanderdust Metering Bin	0.12 lb/MSF VOC 0.00073 lb/MSF Methanol	Bag Filter		
	Throughput	23,315 tpy 5,323 lb/hr 77.2 MSF/hr	Receiver	80.00% for PM/PM <sub>10</sub>	
08	AP-42, Table 10.6.1-7 (03/2002) Sanderdust Metering Bin	0.12 lb/MSF VOC 0.00073 lb/MSF Methanol	Bag Filter	99.96% for PM/PM <sub>10</sub>	
	Air flow/ Grain loading	14,248 dscfm 0.01 grain/dscf	Receiver  Bag Filter	80.00% for PM/PM <sub>10</sub>  99.46% for PM/PM <sub>10</sub>	
09	Throughput	33,152 lb/hr	Receiver	80.00% for PM/PM <sub>10</sub>	
			Bag Filter	99.96% for PM/PM <sub>10</sub>	



SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)			Control Equipment	Control Equipment Efficiency	Comments
10	Production	134.5 tons logs/hr Debarker 13.45 tons bark/hr Bark Hog			None	N/A	Assume bark equals 10% by weight of total logs
	AP-42	0.024 lb/ton PM 0.011 lb/ton PM <sub>10</sub>					
11 Paint / Ink	Inside Spray Booth	8.5 lb/gal 85,324 gal/yr			None	54% (solids content) 30% (exhaust) 98% (filter efficiency)	Total emissions are sum of painting inside and outside spray booth VOC content determined from Highest 0.31 lb VOC/gallon Paint Safety Factor – +20%
	Outside Spray Booth	8.5 lb/gal 7,833 gal/yr					
	Testing	8.5 lb/gal Paint/Ink Density 0.31 lb/gal VOC 0.085 lb/gal HAPs 0.085 lb/gal Ammonia					
12 Roads	AP-42, Section 13.2.1 Paved Roads	PM PM <sub>10</sub>	<u>sL</u> 0.74 0.74	<u>k</u> 0.011 0.0022	Sweeping, water truck, speed limits	N/A	@365 days/yr 334.3 mile/day 122,006.5 mile/yr No rain
	AP-42, Section 13.2.2 Unpaved Roads and measured silt data	PM PM <sub>10</sub>	<u>sL</u> 1.5 1.5	<u>k</u> 4.9 1.5			@365 days/yr 82.9 mile/day 30,243.9 mile/yr 105 days rain
13	NCASI TB 424 Section 13.2.4	8.150 lb PM/day/acre 0.650 acre 7.5% silt # dry days: 260 days/yr % Time Wind = 13			None	N/A	Outside Bark Storage

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
14	OSHA Testing indicates 0.21 ppm VOC/HCHO	0.21 ppm VOC 0.21 ppm CH <sub>2</sub> O <u>Fan Speed</u> 1 @40,000 acfm 6 @48,356 acfm max total fan flow = 330,136 acfm HCOC 0.3476 lb/hr or 1.523 tpy non-point sources in whse	None	N/A	Fin Prod Storage Assume Formaldehyde concentration the same as VOC. VOC conc = 0.21 ft <sup>3</sup> /MMft <sup>3</sup> Fan Speed = 0.330136 MMft <sup>3</sup> /min
15	Throughput	1125 lb adhesive/hour	None	N/A	Overlay Application Max op speed 120 ft/m (900 panels/hr) @ 1.25 lbs adhesive/panel @8760 hr/yr
	Production	0.22% by wt content VOC 0.11% by wt Acetaldehyde 0.03% by wt CH <sub>2</sub> O 0.07% by wt Methanol 0.11% by wt Vinyl Acetate			
16	Throughput	77.2 MSF/hr	None	N/A	Blender @8,760 hrs/yr Safety Factor = 1.2
	AP-42, Table 10.6.1-7 (03/2002) Blender PF & MDI	0.16 lb/MSF VOC 0.0018 lb/MSF Acetone 0.0036 lb/MSF CH <sub>2</sub> O 0.063 lb/MSF Methanol			
17	Throughput	500 hrs/yr	None	N/A	Diesel-fired Emergency Generator
	AP-42, Section 3.3	7,000 Btu/hp-hr			
	AP-42, Table 3.3-1	0.0022 lb/hp-hr PM/PM <sub>10</sub> 0.00205 lb/hp-hr SO <sub>2</sub> 0.00247 lb/hp-hr VOC 0.00668 lb-hp-hr CO 0.031 lb/hp-hr NO <sub>x</sub>			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	AP-42, Table 3.3-2	<u>HAPs</u> 7.67E-04 lb/MMBtu Acetaldehyde 9.25E-04 lb/MMBtu Acrolein 9.33E-04 lb/MMBtu Benzene 0.00118 lb/MMBtu CH <sub>2</sub> O 0.000168 lb/MMBtu POM			

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
01	RTO A and RTO B Minimum Temperatures - 1550°F and 1552°F respectively Subsequent performance test that demonstrates compliance with permit may change the minimum operating temperature	CEM	At least every 15 minutes & reduce the data to 3-hour block average to confirm compliance with minimum temps	Y
01	Isolation Damper	CEM	As occurs changes in damp position: "Open" or "Closed"	N
02	RTO Minimum Temperature [1498 °F] TCO Minimum Temperature [1250 °F] Subsequent performance test that demonstrates compliance with permit may change the minimum operating temperature	CEM	At least every 15 minutes & reduce data to 3-hour block average to confirm compliance w/minimum temp TCO not operating currently.	Y

15. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
01	RTO A and RTO B Minimum Temperatures - 1550°F and 1552°F respectively Subsequent performance test that demonstrates compliance with permit may change the minimum operating temperature	CEM	At least every 15 minutes & reduce the data to 3-hour block average to confirm compliance with minimum temps	Y
01	Isolation Damper	CEM	As occurs changes in damp position: "Open" or "Closed"	N
02	RTO Minimum Temperature [1498 °F] TCO Minimum Temperature [1250 °F] Subsequent performance test that demonstrates compliance with permit may change the minimum operating temperature	CEM	At least every 15 minutes & reduce data to 3-hour block average to confirm compliance w/minimum temp TCO not operating currently.	Y

16. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
Facility	OSB Throughput	600 MMSF/yr on a 3/8-inch basis OSB	Monthly and 12 rolling months	Y
01 & 02 RTO	Performance Tests	PM <sub>10</sub> , VOC, NO <sub>x</sub> , and formaldehyde (one of 2 RTOA/B with 5 dryers operating)	Every 5 years Keep latest test	Y entire report

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01 & 02 RTO	Performance Tests	CO (both RTO A & B separately with 5 dryers operating @90%+)	Every 5 years Keep latest test	Y entire report
01, 02	SSM Plan, SAM Reports and immediate reports of malfunctions	Report malfunctions (Submit start- up, shutdown & malfunction events inconsistent with SSM Plan) Keep current SSM Plan onsite and keep revised SSM Plans for 5 years	Every 6 months	Y
01	Minimum Operating Temperature of RTO A & RTO B	Based on Minimum Temperature recorded during March 2008 performance test, 1550 °F and 1552 °F, respectively, until subsequent tests establish new minimum temp.	Every 15 minutes & reduce the data to 3- hour block average, Record Daily	N
01 & 02	Inlet Fan Static Pressure readings	n/a	Recorded hourly and averaged every 12 hours.	N
01A	Venting to Atmosphere and Fuel used	Only Natural Gas allowed to vent directly to atmosphere	As occurs	N
02	Minimum Operating Temperature of TCO & RTO	Based on Minimum Temperature recorded during March 2004 on TCO performance test , 1250 °F and March 2008 on RTO performance test, 1498 °F, until subsequent tests establish new minimum temp.	Every 15 minutes & reduce the data to 3- hour block average, Record Daily	N
11	VOC emitted & MSDS or equivalent documentation	17.4 tpy  0.31 VOC/gal	Monthly  On going	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Use only non-HAP coatings (see SC #67) & MSDS or equivalent documentation	Non-HAP coating is defined as coating with HAP contents below 0.1% by mass for OSHA defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0% by mass for other HAP compounds.	As necessary	
	MSDS or equivalent documentation of SN-11 ammonia containing materials	Ammonia content of material not to exceed one percent (1.0%) by weight	On going	
	Add recordkeeping of HAPs at SN-11	Must be below reportable threshold limit values (TLVs) and below de minimis levels	Record 2011 one time and keep on-site	
11	Notification	According to the schedule in 40 CFR §63.2280 and according to 40 CFR Part 63, Subpart A	On going	Y
15	<u>If the affected source applies coating to products in the following subcategory:</u> 1. Exterior Siding and Primed Doorskins 2. Flooring 3. Interior Wall Paneling or Tileboard 4. Other Interior Panels 5. Doors, Windows, and Miscellaneous	Must limit organic HAP emissions to the atmosphere to no more than the applicable emission limit(s) in the following table <u>in grams HAP/liter solids (lb HAP/gal solids) is</u> 1. 7 (0.06) 2. 93 (0.78) 3. 183 (1.53) 4. 20 (0.17) 5. 231 (1.93)	Monthly and 12 month rolling	N
15	VOC Acetaldehyde Formaldehyde Methanol Vinyl Acetate [May be MSDS sheets & spreadsheet]	<u>Shall not exceed following Content Limit</u> VOC -0.22 % by weight Acetaldehyde - 0.11 % by weight Formaldehyde -0.03 % by weight Methanol - 0.07 % by weight Vinyl Acetate - 0.11% by weight	Monthly	N
17	Operating Hours of Diesel Generator	Nte 500 operating hours per rolling 12 months, based on non-resettable hour meter	Monthly	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01 and 02	10%	§18.501 and A.C.A.	Weekly
01 and 02	20%	§19.503 and A.C.A.	Daily Observation During "Bakeout"
03 thru 09	10%	§18.501 and A.C.A.	Weekly
10	20%	§19.503 and A.C.A.	Weekly
12 (off-site)	5%	A.C.A.	Water sprays, etc
13	20%	§19.503 and A.C.A.	None
17	20%	§19.503 and A.C.A.	Use of diesel fuel only

18. DELETED CONDITIONS:

Former SC	Justification for removal
	None

19. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	A	Emissions (tpy)						
		PM/ PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							S	Total
Portable Heaters	A-1	---	0.17	0.018	0.012	0.043	--	--
Coolant Tank	A-2	--	--	0.0001	--	--	--	--
Used Oil Tank	A-2	--	--	0.0008	--	--	--	--
Diesel Fueling Tank	A-3	--	--	0.002	--	--	--	--
Emergency Generator Diesel Tank	A-3	--	--	0.001	--	--	--	--

Fire Pump Diesel Tank	A-3	--	--	0.004	--	--	--	--
Kerosene Tank	A-3	--	--	0.0008	--	--	--	--
Thermal Oil Tank	A-3	--	--	0.0008	---	--	--	--
Maintenance Welding and Cutting	A-7	0.125	--	--	--	--	--	0.069
Gasoline Fueling Tank	A-13			0.25				
Emergency Fire Pump	A-13	0.12	0.12	0.14	0.38	1.74		0.003

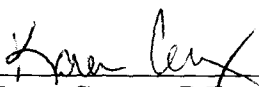
20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1803-AOP-R10

21. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

  
 \_\_\_\_\_  
 Karen Cerney, P.E.



APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 08-26-13

Facility Name: Georgia-Pacific Wood Products, LLC  
 d/b/a/ Fordyce OSB  
 Permit Number: 1803-AOP-R11  
 AFIN: 07-00212

\$/ton factor	23.42	Annual Chargeable Emissions (tpy)	2041.6
Permit Type	Modification	Permit Fee \$	1000

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	-53.1
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM:

*Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

Air Contaminants:

*All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		615.1	564	-51.1	-51.1	564
PM <sub>10</sub>		528	516.7	-11.3		
SO <sub>2</sub>		33.2	34.3	1.1	1.1	34.3
VOC		1010.1	1010.1	0	0	1010.1
CO		944.7	944.7	0		
NO <sub>x</sub>		423.8	423.8	0	0	423.8
Acetaldehyde	<input type="checkbox"/>	11.68	35.08	23.4		
Acrolein	<input type="checkbox"/>	4.51	8.51	4		
Benzene	<input type="checkbox"/>	0.43	2.28	1.85		
Cadmium	<input type="checkbox"/>	0.03	2.59E-02	-0.0041		
Formaldehyde	<input type="checkbox"/>	30.76	30.76	0		
Hexane	<input type="checkbox"/>	3.76	3.29	-0.47		
Methanol	<input type="checkbox"/>	55.03	69.43	14.4		
Phenol	<input type="checkbox"/>	10.54	11.83	1.29		
POM	<input type="checkbox"/>	0.02	1.09E-02	-0.0091		
Propionaldehyde	<input type="checkbox"/>	0.6	3.15	2.55		
Styrene	<input type="checkbox"/>	0	0.2	0.2		
Toluene	<input type="checkbox"/>	0	1.36	1.36		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Arsenic	<input type="checkbox"/>	0	2.32E-02	0.0232		
Beryllium	<input type="checkbox"/>	0	1.16E-03	0.00116		
Chromium, hexavalent	<input type="checkbox"/>	0	3.68E-03	0.00368		
Manganese	<input type="checkbox"/>	0	1.71	1.71		
Mercury	<input type="checkbox"/>	0	3.74E-03	0.00374		
Vinyl Acetate	<input type="checkbox"/>	5.43	5.43	0		
Combined HAPs	<input type="checkbox"/>	4	4	0		
Acetone	<input checked="" type="checkbox"/>	8.5	5.4	-3.1	-3.1	5.4
Ammonia	<input checked="" type="checkbox"/>	4	4	0	0	4