

ADEQ OPERATING AIR PERMIT

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

Permit #: 1803-AOP-R2

IS ISSUED TO:

Georgia-Pacific Oriented Strandboard Facility
State Highway 274
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-R2

FACILITY ADDRESS: State Highway 274
Fordyce, AR 71742

COUNTY: Calhoun

CONTACT POSITION: Paul Vasquez
TELEPHONE NUMBER: (404) 652-3564

REVIEWING ENGINEER: Michael H. Watt

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

Georgia-Pacific Oriented Strandboard Facility
Permit #: 1803-AOP-R2
CSN #: 07-0212

SECTION II: INTRODUCTION

Summary of Permit Activity

Georgia-Pacific Corporation (GP) owns and operates an oriented strandboard (OSB) facility near Fordyce, Arkansas. This facility currently has the capacity to produce 475 million square feet (MMSF), on a 3/8-inch basis, of OSB annually. This facility includes five dryers, a press, and associated materials handling equipment. The dryers and press are currently controlled by three regenerative thermal oxidizers (RTOs). Two of the RTOs are dedicated to the dryers and the third controls emissions from the press. Particulate matter emissions resulting from material handling are controlled by a series of bag filters.

This modification makes the following changes:

1. Increases the permitted capacity of the plant from 475 million square feet on a 3/8-inch basis of OSB to 600 million square feet of OSB on a 3/8-inch basis. This increase in throughput is a result of under-estimation of initial equipment capacity. No new equipment is being added to achieve this increase,
2. Allows for GP to convert the Press RTO (SN-02) to a thermal catalytic oxidizer (TCO) by adding catalytic media above the existing ceramic media. **The facility will have the option of operation the oxidizer either as a TCO or RTO.** There will be no change in emissions or BACT associated with this change,
3. Increases the CO emission rates on the Dryer (SN-01) to allow for a lower RTO set temperature. The Dryer RTO set temperatures will change from 1630 to 1550 degrees Fahrenheit in an effort to slow deterioration of the ceramic media. **The RTO set temperature can be reset to a higher value provided that the facility demonstrates compliance with the applicable emission limits contained in this permit,**
4. Updates AP-42 emission factors for Wood Combustion and OSB Manufacturing (Sections 1.6 and 10.6 respectively), and
5. **Allows for visible emissions up to 20% opacity for SN-01 and SN-02 during the performance of off-line maintenance functions (i.e., the modified bakeout of the oxidizers.)**

These changes will increase the pound per hour and ton per year limits, but the pound per million board foot emission rates will remain unchanged except for the increase in CO emissions due to

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the change in RTO temperature.

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GP is considered a major stationary source under the Prevention of Significant Deterioration (PSD) Regulations. Emission increases in this permit for PM, PM₁₀, VOC, and CO 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	Air Permit 1803-AOP-R2	Total Change	PSD Significance Level
PM (Non-Fugitive)	398.8	485.5	86.7	25
PM (Fugitive)	283.6	266.3	-17.3	None*
PM₁₀ (Non-Fugitive)	398.8	485.5	86.7	15
PM₁₀ (Fugitive)	75.4	68.6	-6.8	None*
SO₂	20.5	30.7	10.2	40
VOC	641.8	810.4	168.6	40
CO	179.0	1,179.2	1000.2	100
NO_x	368.1	380.3	12.2	40

* Fugitive emissions are not included in PSD Applicability Determinations.

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 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

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strandboard plants. 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.

In the previous permit for this facility, formaldehyde emissions were permitted at 9.85 tons per year. Because of the increase in throughput associated with this modification, formaldehyde emissions for this facility have increased to 14.7 tons per year. As such, the facility is subject to MACT review under 112(g).

Under Section 112(g), the MACT limitation for new sources is defined in 40 CFR 63.41 as “The emission limitation which is not less stringent than the emission limitation achieved in practice by the best controlled similar source, and which reflects the maximum degree of reduction in emissions that the permitting authority, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable by the constructed or reconstructed major source.”

The formaldehyde emissions will be controlled by the controls for the dryers and the press, regenerative thermal oxidation and thermal catalytic oxidation/regenerative thermal oxidation, respectively. Therefore, the MACT for formaldehyde will be to control emissions to the BACT level. This level of control is consistent with other case-by-case MACT determinations for an other facility. Georgia Pacific has previously performed stack testing for formaldehyde emissions, and will continue to stack test to show compliance with the BACT and therefore the MACT limits.

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

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the log yard is shipped off-site for use as wood fuel or for use in horticultural applications.

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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 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 1200 to 1600EF 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.

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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.

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).

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Dryers

Several 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 with a set point of 1,630 degrees Fahrenheit (high CO destruction efficiency),
2. Regenerative catalytic oxidation (RCO) with particulate matter control with a set point of 1,630 degrees Fahrenheit (low CO destruction efficiency),
3. Regenerative thermal oxidation (RTO) with particulate matter control with a set point of 1,550 degrees Fahrenheit,
4. Regenerative catalytic oxidation (RCO) with particulate matter control with a set point of 1,550 degrees Fahrenheit,
5. Biofilter with particulate matter control,
6. Recycle system with indirect heat exchange and particulate matter control,
7. Wet electrostatic precipitation (wet ESP), and
8. Selective catalytic reduction (SCR).

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.

Dryer RTOs with a set point of 1,630 degrees Fahrenheit were previously used at this facility, but were found to be technically infeasible because the temperature was too hot and destroyed the heat exchange media.

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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 (with a set point of 1,630 EF)	90.0%	75.0%	90.0%
RTO/Multiclones (with a set point of 1,550 EF)	80.0%	40.0%	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.

In the previous permit, RTO with multiclones (with a set point temperature of 1,630 EF) was determined BACT for this unit. Since no media was found that could withstand that high a temperature, this method of control was determined to be technically infeasible.

Since RTO with multiclones (with a set point temperature of 1550 EF) 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 based on the previous PSD permit.

Press

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

1. RTO/TCO
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/TCO	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 Scrubber	80.0%	0.0%	5.0%

Since RTO/TCO 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 from the previous PSD permit.

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 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 in the initial PSD permit) 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	0.005	0.2
24-Hour	0.072	0.3

Class I Screening Analysis Results for NO_x		
Averaging Period	Maximum Concentration (µg/m³)	Screening Level (µg/m³)
Annual	0.004	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	0.40	3.7

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 did not exceed the modeling significance level or monitoring significance level. CO emissions were below modeling and monitoring significance levels.

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The maximum concentration results and the significance levels for PM₁₀, CO, and NO_x are included in the following tables.

Significant Impact Analysis Modeling				
Pollutant	Maximum Concentration Results (µg/m³)			
	Annual	24-Hour	8-Hour	1-Hour
PM ₁₀	5.2	32.9	-	-
CO	-	-	60.5	118.2
NO _x	0.74	-	-	-

Significant Impact Analysis Modeling				
Pollutant	Modeling Significance Levels (µg/m³)			
	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 (µg/m³)			
	Annual	24-Hour	8-Hour	1-Hour
PM ₁₀	-	10.0	-	-
CO	-	-	575.0	-

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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. 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 are contained in the following table:

NAAQS Analysis Results for PM₁₀				
Averaging Period	Maximum Concentration (µg/m³)	Background (µg/m³)	Total (µg/m³)	NAAQS (µg/m³)
Annual	9.1	27.0	36.1	50.0
24-Hour	65.0	56.0	121.0	150.0

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.

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.

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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	5.2	17.0	29.4%
24-Hour	25.3	30.0	84.3%

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.

- (a) The area where greater than 80% of the 24-hour PM₁₀ 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.

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Air Quality Monitoring

The modeling information as indicated in the Preliminary Impact Analysis 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 PM₁₀ emissions. In lieu of pre-construction monitoring, the Department has accepted use of existing data from a PM₁₀ monitor located in El Dorado because of its close proximity to the facility. The PM₁₀ background concentrations were established to be 27.0 µg/m³ for the annual averaging period and 56.0 µg/m³ 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.

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.

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. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY				
Source	Description	Pollutant	Emission Rates	Cross

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			lb/hr	tpy
Total Allowable Emissions		PM	214.9	751.8
		PM ₁₀	142.9	554.1
		SO ₂	7.0	30.7
		VOC	185.0	810.4
		CO	269.2	1,179.2
		NO _x	86.8	380.3
HAPs (Note: all HAPs are included in VOC total)		Acetaldehyde	0.87	3.82
		Formaldehyde	3.2	14.7
		Methanol	0.65	2.85
		Phenol	1.67	7.30
		POM	0.01	0.01
01	Dryers	PM	94.1	412.2
		PM ₁₀	94.1	412.2
		SO ₂	7.0	30.7
		VOC	159.5	698.8
		CO	260.0	1,138.8
		NO _x	73.3	321.1
		Acetaldehyde	0.87	3.82
		Formaldehyde	2.50	11.8
		Methanol	0.65	2.85
		Phenol	1.67	7.30
		POM	0.01	0.01
02	Press	PM	3.5	15.5
		PM ₁₀	3.5	15.5
		VOC	25.3	110.7
		CO	9.2	40.4
		NO _x	13.5	59.2
		Formaldehyde	0.5	2.2
03	Screen Fines with Saw Trim Transfer Pneumatics	PM	2.7	11.6
		PM ₁₀	2.7	11.6
04	Saw Trim/Finishing	PM	2.1	9.0
		PM ₁₀	2.1	9.0

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
	Line Pneumatics				
05	Mat Reject/Flying Saw Pneumatics	PM PM ₁₀	2.9 2.9	12.7 12.7	
06	Specialty Saw/Sander Pneumatics	PM PM ₁₀	1.3 1.3	5.7 5.7	
07	Fuel System Pneumatics	PM PM ₁₀	0.5 0.5	1.9 1.9	
08	Forming Bins Pneumatics	PM PM ₁₀	1.2 1.2	5.3 5.3	
09	Hammermill System Pneumatics	PM PM ₁₀	2.7 2.7	11.6 11.6	
10	Fugitive Emission Sources	PM PM ₁₀ VOC Formaldehyde	103.9 31.9 0.2 0.2	266.3 68.6 0.9 0.7	

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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.

Permit 1803-AOP-R1 was issued to Georgia Pacific Oriented Strandboard Facility on June 29, 2000. This modification to the initial permit corrected the fugitive emission calculations and updated PSD modeling because of a change in stack parameters. The PSD section of this permit is included below.

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).

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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:

6. Regenerative thermal oxidation (RTO) with particulate matter control,
7. Regenerative catalytic oxidation (RCO) with particulate matter control,
8. Biofilter with particulate matter control,
9. Recycle system with indirect heat exchange and particulate matter control,
10. Wet electrostatic precipitation (wet ESP),
11. Wet Scrubbers, and
12. 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.

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

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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.

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

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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.

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		
	Maximum	Screening Level

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Averaging Period	Concentration ($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)
Annual	0.0056	0.1

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, PM₁₀, CO, and NO_x emission rates exceed the PSD significant emission rate levels. Therefore, a significant impact analysis was performed for PM₁₀, 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 PM₁₀ 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 PM₁₀, CO, and NO_x are

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included in the following tables.

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	-	-

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CO	-	-	575.0	-
NO _x	14.0	-	-	-

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

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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 PM₁₀ 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 ?) 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 PM₁₀ emissions. In lieu of pre-construction monitoring, the Department has accepted use of existing data from a PM₁₀ monitor located in El Dorado because of its close proximity to the facility. The PM₁₀ background concentrations were established using 1996 monitoring data to be 25 µg/m³ for the annual averaging period and 57 µg/m³ 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.

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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 and MACT for this source has been determined to be a shared system of multiclones followed by two parallel regenerative thermal oxidizers (RTOs).

Specific Conditions

1. Pursuant to §19.901 et seq. of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 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 #4, Plantwide Conditions #7, #9, #13, #15, and #16, and equipment limitations.

Pollutant	lb/hr	tpy
PM ₁₀	94.1	412.2
PM	94.1	412.2
VOC	159.5	698.8
CO	260.0	1,138.8
NO _x	73.3	321.1

2. Pursuant to §19.501 et seq. of Regulation #19 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 Plantwide Conditions #7, #9, #13, #15, and #16, and equipment limitations.

Pollutant	lb/hr	tpy

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Pollutant	lb/hr	tpy
SO ₂	7.0	30.7

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3. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #5, Plantwide Conditions #7, #9, #13, #15, and #16, and equipment limitations.

Pollutant	lb/hr	tpy
Acetaldehyde	0.87	3.82
Formaldehyde	2.50	11.80
Methanol	0.65	2.85
Phenol	1.67	7.30
POM	0.01	0.01

4. 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.
5. 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. BACT and MACT for this source has been determined to be a shared system of multiclones followed by a Thermal Catalytic Oxidizer (TCO).

Specific Conditions

6. Pursuant to §19.901 et seq. of Regulation #19 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 #8, Plantwide Conditions #7, #9, #13, #15, and #16, and equipment limitations.

Pollutant	lb/hr	tpy
PM ₁₀	3.5	15.5
PM	3.5	15.5
VOC	25.3	110.7
CO	9.2	40.4
NO _x	13.5	59.2

7. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by Specific Condition #9, Plantwide Conditions #7, #9, #13, #15, and #16, and equipment limitations.

Pollutant	lb/hr	tpy
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Pollutant	lb/hr	tpy
Formaldehyde	0.5	2.2

8. Pursuant to §19.702 of Regulation #19, 19.901 et seq., and 40 CFR Part 52, Subpart E, the permittee shall test the TCO in SN-02 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 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.

9. 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 TCO 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

10. Pursuant to §19.901 et seq. of Regulation #19 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 equipment limitations.

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

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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

11. Pursuant to §19.901 et seq. of Regulation #19 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 equipment limitations.

Pollutant	lb/hr	tpy
PM ₁₀	2.1	9.0
PM	2.1	9.0

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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

12. Pursuant to §19.901 et seq. of Regulation #19 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 equipment limitations.

Pollutant	lb/hr	tpy
PM ₁₀	2.9	12.7
PM	2.9	12.7

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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

13. Pursuant to §19.901 et seq. of Regulation #19 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 equipment limitations.

Pollutant	lb/hr	tpy
PM ₁₀	1.3	5.7
PM	1.3	5.7

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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

14. Pursuant to §19.901 et seq. of Regulation #19 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 equipment limitations.

Pollutant	lb/hr	tpy
PM ₁₀	0.5	1.9
PM	0.5	1.9

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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

15. Pursuant to §19.901 et seq. of Regulation #19 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 equipment limitations.

Pollutant	lb/hr	tpy
PM ₁₀	1.2	5.3
PM	1.2	5.3

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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

16. Pursuant to §19.501 et seq. of Regulation #19 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 equipment limitations.

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

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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

17. Pursuant to §19.901 et seq. of Regulation #19 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 equipment limitations.

Pollutant	lb/hr	tpy
PM ₁₀	31.9	68.6
PM	103.9	266.3
VOC	0.2	0.9

18. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by equipment limitations.

Pollutant	lb/hr	tpy
Formaldehyde	0.2	0.7

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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 §19.704 of Regulation #19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation #19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation #19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested 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 or (2) equipment already operating shall be tested according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation #19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
5. Pursuant to §19.303 of Regulation #19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.
7. Pursuant to §19.901 et seq. of Regulation #19, and 40 CFR Part 52, Subpart E, the permittee shall not produce in excess of 600 million square feet of OSB, on a 3/8-inch basis, during any consecutive 12-month period.
8. Pursuant to §19.705 of Regulation #19, §19.901 et seq., and 40 CFR Part 52, Subpart E, and 40 CFR Part 52 Subpart E, the permittee shall maintain records which demonstrate compliance with the throughput limit set in Plantwide Condition #7. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to the Department in accordance with General Condition #7.
9. Pursuant to §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 Dryer RTOs (SN-01) shall be operated at the minimum temperature set point of 1,550 EF.
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 which demonstrate compliance with Plantwide Condition #9. 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.
11. Pursuant to §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 Press TCO/RTO (SN-02) shall be operated at the minimum temperature set point of 800 EF when operated as a TCO and 1,505 EF when operated as an RTO.
12. 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 #11. Readings will be recorded every 15 minutes and averaged every 12 hours. These records shall also include which mode (TCO or RTO) the control equipment is operating. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes.
13. 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 and TCO/RTO shall have a maximum volumetric flow rate of 120% of the maximum air flow established during the compliance test.

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14. 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 #13. 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.
15. 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.
16. 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 when the isolation damper is in the open position. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes.
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% from SN-01, SN-02, SN-03, SN-04, SN-05, SN-06, SN-07, SN-08, and SN-09. 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 §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, weekly observations of the opacity from SN-01, SN-02, SN-03, SN-04, SN-05, SN-06, SN-07, SN-08, and 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.
 1. The date and time of the observation
 2. If visible emissions which appeared to be above the permitted limit were detected
 3. 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.
 4. The name of the person conducting the opacity observations.

19. Pursuant to §19.503 of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not cause to be discharged to the atmosphere gases which exhibit an opacity greater than 20% from SN-01 and SN-02 during off-line maintenance functions (i.e., the modified bakeout of the oxidizers) and from SN-10 during regular operation. 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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20. Pursuant to §19.503 of Regulation #19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from SN-01 and SN-02 during off-line maintenance functions and from SN-10 during regular operation shall be conducted by personnel familiar with the permittee's visible emissions. Observations of SN-01 and SN-02 must be made while the off-line maintenance function is occurring. 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.
1. The date and time of the observation
 2. If visible emissions which appeared to be above the permitted limit were detected
 3. 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.
 4. The name of the person conducting the opacity observations.

Title VI Provisions

21. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
- a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

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22. 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.
23. 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.
24. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.
25. 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.

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Permit Shield

26. 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.

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

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			to process dryers.
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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 §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated May 2002.

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation #19, Appendix A, Group B, 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.

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SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 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 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000, 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 §26.406 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 CFR 70.6(a)(1)(ii) and §26.701(A)(2) 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.

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5. Pursuant to 40 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) 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 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) 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 Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

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8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.701(C)(3)(b) of Regulation #26, and §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 by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
- a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,
 - e. The duration of the deviation,
 - f. The average emissions during the deviation,
 - g. The probable cause of such deviations,
 - h. Any corrective actions or preventive measures taken or being taken 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) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 CFR 70.6(a)(5) and §26.701(E) 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.

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10. Pursuant to 40 CFR 70.6(a)(6)(i) and §26.701(F)(1) 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 CFR 70.6(a)(6)(ii) and §26.701(F)(2) 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 CFR 70.6(a)(6)(iii) and §26.701(F)(3) of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.701(F)(5) 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 CFR 70.6(a)(7) and §26.701(G) of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.701(H) 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.

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17. Pursuant to 40 CFR 70.6(a)(9)(i) and §26.701(I)(1) 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 CFR 70.6(b) and §26.702(A) and (B) 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 CFR 70.6(c)(1) and §26.703(A) of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 CFR 70.6(c)(2) and §26.703(B) 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.

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21. Pursuant to 40 CFR 70.6(c)(5) and §26.703(E)(3) 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 §26.704(C) of Regulation #26, nothing in this permit shall alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

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

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

Request for PDS Invoice	
Invoice Number <i>(assigned when invoice printed)</i>	PDS-

AFIN r	07-00212		
Name <i>(for confirmation only)</i>	Georgia Pacific Corporation, Oriented Strandboard Facility		
Invoice Type (pick one) r	Initial	Mod X	Variance
	Annual	Renewal	Interim Authority
Permit Number r	1803-AOP-R2		
Media Code r	A		
Fee Code or Pmt Typer	T5 PSD		
Fee Description <i>(for confirmation only)</i>	Title V and PSD		
Amount Due r <i>(whole dollar amount only)</i>	\$2,842		
Printed Comment <i>(600 characters maximum)</i>			

<i>Note: The information below is for use by the requesting division if desired; it will not print on the invoice.</i>	
Engineer	Michael H. Watt
Paid? (yes/no)	
Check number	
Comments	\$19.93 * (-128.3+79.9+10.2+168.6+12.2) = \$2,842

r **Required data** (See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)

Request submitted by:	Date:
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Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 602, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Georgia-Pacific Corporation (GP) owns and operates an oriented strandboard (OSB) facility near Fordyce, Arkansas. This modification makes the following changes:

1. Increases the permitted capacity of the plant from 475 million square feet on a 3/8-inch basis of OSB to 600 million square feet of OSB on a 3/8-inch basis. This increase in throughput is a result of under-estimation of initial equipment capacity. No new equipment is being added to achieve this increase,
2. Allows for GP to convert the Press RTO (SN-02) to a thermal catalytic oxidizer (TCO) by adding catalytic media above the existing ceramic media,
3. Increases the CO emission rates on the Dryer (SN-01) to allow for a lower RTO set temperature. The Dryer RTO set temperatures will change from 1630 to 1550 degrees Fahrenheit in an effort to slow deterioration of the ceramic media, and
4. Updates AP-42 emission factors for Wood Combustion and OSB Manufacturing (Sections 1.6 and 10.6 respectively).

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 Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact Michael H. Watt, Engineer. Both Doug Szenher 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: Doug Szenher. 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

Marcus C. Devine
Director