

ADEQ

ARKANSAS
Department of Environmental Quality

June 21, 2007

DeWayne Henry, Environmental Coordinator
Georgia-Pacific Oriented Strandboard Facility
PO Box 1095
Fordyce, AR 71742

Dear Mr. Henry:

The enclosed Permit No. 1803-AOP-R5 is issued pursuant to the Arkansas Operating Permit Program, Regulation # 26.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 1803-AOP-R5 for the construction, operation and maintenance of an air pollution control system for Georgia-Pacific Oriented Strandboard Facility to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under §2.1.14 of Regulation No. 8, Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, within thirty (30) days after service of this decision.

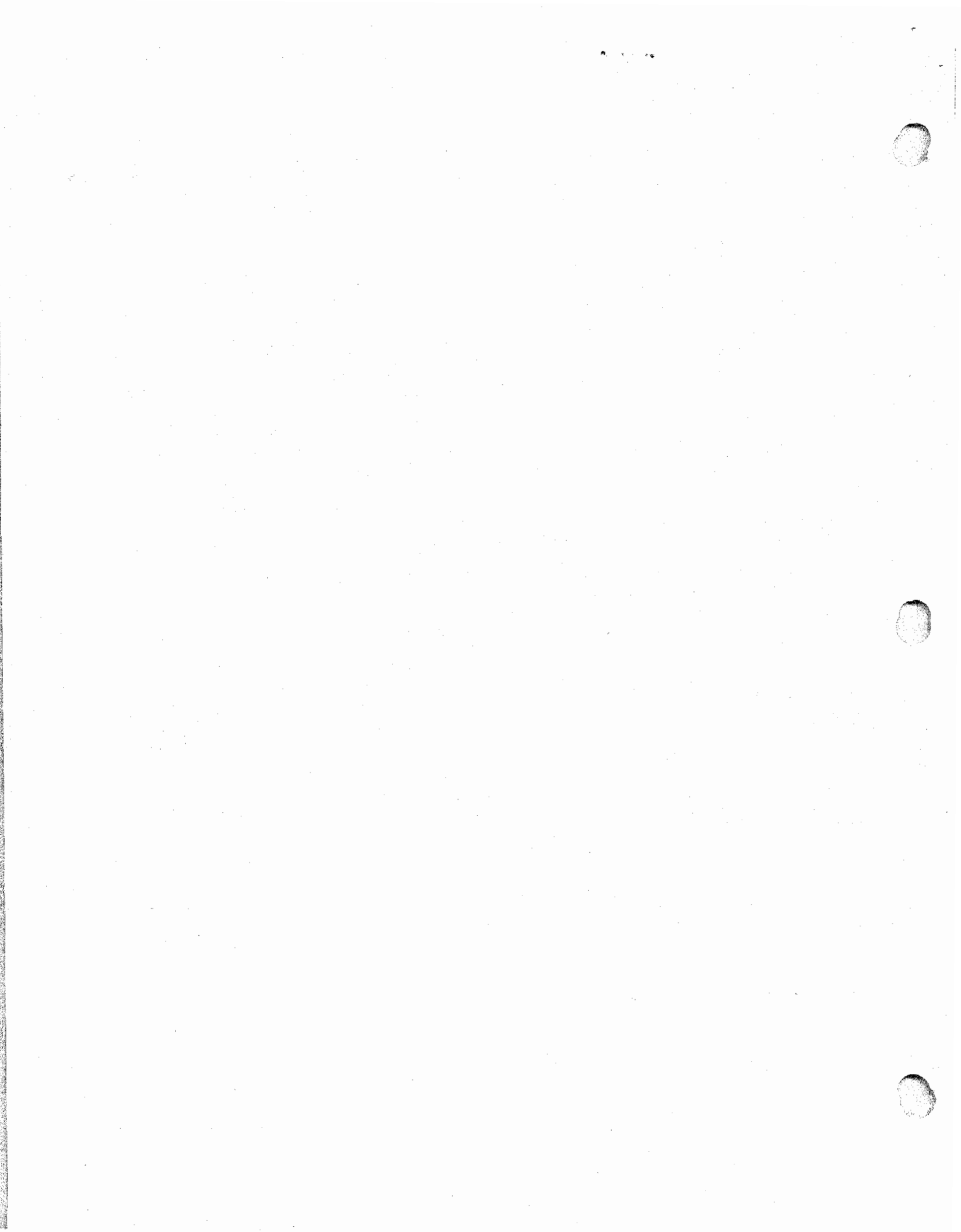
All persons submitting written comments during this thirty (30) day period, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by §2.1.14 of Regulation No. 8.

Sincerely,



Mike Bates
Chief, Air Division

AIR DIVISION



ADEQ OPERATING AIR PERMIT

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

Permit No. : 1803-AOP-R5

IS ISSUED TO:

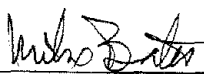
Georgia-Pacific Wood Products, LLC Fordyce OSB
#1 Georgia-Pacific Road
Fordyce, AR 71742
Calhoun County
AFIN: 07-00212

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:

July 8, 2004 AND July 7, 2009

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



Mike Bates
Chief, Air Division

June 21, 2007

Date Modified

Georgia-Pacific Wood Products, LLC Fordyce OSB

Permit #: 1803-AOP-R5

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM10	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Georgia-Pacific Wood Products, LLC Fordyce OSB

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SECTION I: FACILITY INFORMATION

PERMITTEE: Georgia-Pacific Wood Products, LLC Fordyce OSB

AFIN: 07-00212

PERMIT NUMBER: 1803-AOP-R5

FACILITY ADDRESS: #1 Georgia-Pacific Road
Fordyce, AR 71742

MAILING ADDRESS P.O. Box 1095
Fordyce, AR 71742

COUNTY: Calhoun

CONTACT POSITION: Dewayne Henry, Environmental Coordinator

TELEPHONE NUMBER: (870) 352-7252

REVIEWING ENGINEER: Siew Low

UTM North South (Y): Zone 15: 3,735.9 km

UTM East West (X): Zone 15: 558.6 km

SECTION II: INTRODUCTION

Summary of Permit Activity

Georgia-Pacific Wood Products, LLC Fordyce OSB owns and operates an oriented strandboard (OSB) facility near Fordyce, Arkansas. This facility currently has the capacity to produce 600 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 modification includes increase of throughput on the Mat Reject/Flying Saw Pneumatics (SN-05), increase of throughput on the Overlay Project included in the Uncontrolled Emission Sources (SN-10), and updates the insignificant activities list. This modification also allows the facility to reduce CO emissions from SN-01, and requires annual CO testing of both RTOs at SN-01 as required by LIS #06-127. This permit modification will decrease CO emissions by 262.8 tpy.

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.

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 (SN-09) and then stored in a metering bin. From the metering bin, the ground wood fuel is pneumatically transferred (SN-07) 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 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.

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The dryers are also equipped with 40 MMBTU/hr natural gas-fired burners for back-up purposes. 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. The dryers are controlled by two RTOs (SN-01) that are preceded by multiclones.

Forming and Pressing

The dried wood flakes are blended with resin and wax, and are then placed as a mat on the forming line (SN-08) in layers, oriented at right angles, to provide structural integrity. The oriented material is then cut to size (SN-05), and the mat is moved into the thermal-oil-heated press, where it is compressed and heated to bond the resin to the flakes. The press emissions are controlled by a thermal catalytic oxidizer (TCO, SN-02). The TCO was originally constructed and installed as an RTO, but catalytic media has since been added above the ceramic media, converting the unit to a TCO. The thermal oil, that is used to heat the press, is heated to the appropriate temperature in a separate system, consisting of two, wood fuel, suspension-type burners, rated at 40 MMBTU/hr each. Two 30 MMBTU/hr natural gas-fired burners (EP-1A, SN-01A) are included in the thermal oil units as well for back-up purposes. While burning wood, the exhaust gases from the thermal oil system are routed through the dryer system and exit via the multiclones and RTOs. When the thermal oil system is not burning wood and is using the natural gas-fired burners in lieu of the wood fuel burners, emissions from the natural gas-fired burners vent to the atmosphere. Air pollutant emissions associated with the board press operation include PM, VOCs, CO, NO_x and minor quantities of HAPs (e.g. formaldehyde, phenol, and methanol).

Finishing

The pressed mats are cut to size (SN-04), and the edges are sprayed with sealant to prevent swelling. Some product is routed through a specialty saw (SN-06). The finished OSB is then packed and shipped off-site. Bark from the debarkers and other green end material from the log yard is shipped off-site for use as wood fuel or for use in horticultural operations. Dry end material (SN-03) 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. There are times when a limited amount of this wood waste is stockpiled.

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 (SN-03), saw trim and finishing line pneumatics (SN-04), materials reject and flying saw pneumatics (SN-05), specialty saw and sander pneumatics (SN-06), fuel system pneumatics (SN-07), forming bin pneumatics (SN-08), and hammermill system pneumatics (SN-09). The pollutant emissions from these operations are limited to PM. Non-stack sources of air emissions (SN-10) include the bark handling (batch drops and wind erosion from storage piles), paved and unpaved roads, debarkers, bark hog, edge-sealing of finished boards, resin tank, blend house, and finished product storage.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective May 28, 2006
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
40 CFR Part 64 Compliance Assurance Monitoring (CAM)
40 CFR Part 63, Subpart DDDD, <i>National Emissions Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products</i>
40 CFR Part 63, Subpart QQQQ, <i>National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products (SN-10)</i>

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.

Section 112(g) of the Clean Air Act requires that each newly constructed "major" emission source of hazardous air pollutants (HAPs) meets emission limits specified in the applicable 112(d) MACT standard or resulting case-by-case MACT determination when the 112(d) standard has not yet been promulgated for the specified source category. A major source of HAPs is defined as one that emits 10 tons per year or more of a single HAP or 25 tons per year or more of all HAPs combined.

Formaldehyde emissions for this facility are 27.91 tons per year, methanol emissions are 45.60 tons per year, and phenol emissions are 10.54 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 HAP 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 the listed HAPs will be to control emissions to the BACT level. This level of control is consistent with other case-by-case MACT determinations for another facility.

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The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			Lb/hr	tpy
Total Allowable Emissions		PM	216.1	756.4
		PM ₁₀	144.1	558.7
		SO ₂	7.1	30.8
		VOC	211.1	923.5
		CO	212.3	929.7
		NO _x	89.8	393.5
HAPs*		Acetaldehyde*	1.37	4.85
		Formaldehyde*	7.18	27.80
		Methanol*	10.67	45.80
		Phenol*	2.96	10.54
		Vinyl Acetate*	0.36	0.50
01	Dryers	PM ₁₀	94.1	412.2
		SO ₂	7.0	30.7
		VOC	159.5	698.8
		CO	200.0	876.0
		NO _x	73.3	321.1
		PM	94.1	412.2
		Acetaldehyde*	1.21	3.82
		Formaldehyde*	5.00	21.90
		Methanol*	0.84	2.85
Phenol*	2.22	7.30		
01A	Thermal Oil Heaters	PM ₁₀	0.3	1.0
		SO ₂	0.1	0.1
		VOC	0.2	0.8
		CO	3.1	13.3
		NO _x	3.0	13.2
		PM	0.3	1.0

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Source Number	Description	Pollutant	Emission Rates	
			Lb/hr	tpy
02	Press	PM ₁₀	3.5	15.5
		VOC	25.3	110.7
		CO	9.2	40.4
		NO _x	13.5	59.2
		PM	3.5	15.5
		Acetaldehyde*	0.06	0.24
		Formaldehyde*	1.00	4.40
		Methanol*	5.14	22.50
03	Screen Fines/Saw Trim Transfer Pneumatics	PM ₁₀	2.7	11.6
		VOC	7.8	34.2
		PM	2.7	11.6
		Methanol*	0.06	0.27
04	Saw Trim/Finishing Line Pneumatics	PM ₁₀	2.1	9.0
		PM	2.1	9.0
05	Mat Reject/Flying Saw Pneumatics	PM ₁₀	3.8	16.3
		PM	3.8	16.3
06	Specialty Saw/Sander Pneumatics	PM ₁₀	1.3	5.7
		VOC	4.2	18.0
		PM	1.3	5.7
		Formaldehyde*	0.03	0.11
		Methanol*	0.13	0.54
07	Fuel System Pneumatics	PM ₁₀	0.5	1.9
		VOC	4.2	18.0
		PM	0.5	1.9
		Formaldehyde*	0.03	0.11
		Methanol*	0.13	0.54
08	Forming Bins Pneumatics	PM ₁₀	1.2	5.3
		VOC	8.9	39.0
		PM	1.2	5.3
		Formaldehyde*	0.25	1.08
		Methanol*	4.32	18.90
09	Hammermill System Pneumatics	PM ₁₀	2.7	11.6
		PM	2.7	11.6

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			Lb/hr	tpy
10	Non-Stack Emission Sources	PM ₁₀	31.9	68.6
		VOC	1.0	4.0
		PM	103.9	266.3
		Acetaldehyde*	0.18	0.79
		Formaldehyde*	0.11	0.51
		Methanol*	0.05	0.20
		Vinyl Acetate*	0.36	1.58

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

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. For the Dryer (SN-01), an RTO with multiclones was selected as BACT for PM, CO, and VOC emissions, and a low-NO_x burner design was proposed for BACT for NO_x emissions. For the Press (SN-02), RTO is selected as BACT for PM, CO, and VOC emissions, and a low-NO_x burner design is proposed for BACT for NO_x. For the Material Handling Sources, a bagfilter-type dust collector is selected as BACT for PM.

Permit 1803-AOP-R2 was issued to Georgia Pacific Oriented Strandboard Facility on January 7, 2003. This modification made the following changes:

1. Increased 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 was a result of under-estimation of initial equipment capacity. No new equipment was added to achieve this increase.
2. Allowed 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. Increased the CO emission rates on the Dryer (SN-01) to allow for a lower RTO set temperature. The Dryer RTO set temperatures changed from 1,630 to 1,550 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. Updated AP-42 emission factors for Wood Combustion and OSB Manufacturing (Sections 1.6 and 10.6 respectively).
5. Allowed 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 increased the pound per hour and ton per year limits, but the pound per million board foot emission rates remained unchanged except for the increase in CO emissions due to the change in RTO temperature.

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For the Dryers (SN-01), the RTO with multiclones (with a set point temperature of 1550 °F) was selected as BACT for PM, CO, and VOC emissions, and a low-NO_x burner design, combined with fuel enhancement, was proposed for BACT for NO_x. For the Press (SN-02), an RTO/TCO was selected as BACT for PM, CO, and VOC emissions, and a low-NO_x burner design was proposed for BACT for NO_x from the previous PSD permit. For the Material Handling Sources, a bagfilter-type dust collector was selected as BACT for PM.

Permit 1803-AOP-R3 was issued to Georgia Pacific Oriented Strandboard Facility on July 8, 2004. This renewal made the following changes:

1. Reduced the required frequency of emissions testing for the Dryers and Press (SN-01 and SN-02) from once every year to once every five years based on past demonstrations of compliance,
2. Added the emissions associated with natural gas usage in the thermal oil system when the emissions are exhausted out of the bypass stacks (SN-01A),
3. Updated the HAP hourly and annual emission rates based on the most current AP-42 emission factors and stack testing results,
4. Added the CAM plan, and
5. Increased opacity limits from 5% to 10%.

Permit 1803-AOP-R3 was administratively amended on December 6, 2005. This amendment added the Specialty Saw/Sander Pneumatics to the Insignificant Activities list.

Permit 1803-AOP-R4 was issued on September 14, 2006. This minor modification allowed the facility to move the Overlay Project from the insignificant activities table into the Non-Stack Emissions Sources (SN-10). Increases from this modification were 0.8 tons per year of PM, 1.2 tons per year of VOC, 0.20 tons per year of acetaldehyde, 0.49 tons per year of formaldehyde, 0.10 tons per year of methanol, and 0.50 tons per year of vinyl acetate.

SECTION IV: SPECIFIC CONDITIONS

SN-01 Dryers

Source Description

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

Because uncontrolled emissions at this source would be greater than 100 tons per year for PM₁₀, VOC, CO, and NO_x, this source is subject to Compliance Assurance Monitoring (CAM). The CAM plan for this source is monitoring of temperature and air flow, using operational status indicators of the static pressure of each ID fan and the isolation damper position status, and keeping records to demonstrate compliance. Optimal temperature, air flow, static pressure, and damper position values have been determined using stack testing.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #8, #10, #14, and #16, Plantwide Condition #7, and equipment limitations. [§19.901 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	94.1	412.2
VOC	159.5	698.8
CO	200.0	876.0
NO _x	73.3	321.1

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2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #8 and #10, Plantwide Condition #14, and equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
SO ₂	7.0	30.7

3. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #8, #10, and #15, Plantwide Condition #7, and equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	94.10	412.20
Acetaldehyde	1.21	3.82
Formaldehyde	5.00	21.90
Methanol	0.84	2.85
Phenol	2.22	7.30

4. Visible emissions may not exceed (except as noted in Specific Condition #6) the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
01	10%	§18.501 of Regulation #18

5. The permittee shall conduct weekly observations of the opacity from SN-01 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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6. Visible emissions may not exceed the limits specified in the following table of this permit during off-line maintenance functions (i.e., the modified bakeout of the oxidizers) as measured by EPA Reference Method 9. [40 CFR Part 52, Subpart E]

SN	Limit	Regulatory Citation
01	20%	§19.503 of Regulation #19

7. The permittee shall conduct daily observations of the opacity from SN-01 during off-line maintenance functions and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§19.503 of Regulation #19 and 40 CFR Part 52, Subpart E]
8. The Dryer RTOs (SN-01) shall be operated at the minimum temperature set point of 1,550 °F. [§19.303 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
9. The permittee shall maintain continuous records which demonstrate compliance with Specific Condition #8. 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. [§19.705 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, and 40 CFR Part 64]
10. The RTOs shall have a maximum volumetric flow rate of 120% of the maximum air flow established during the compliance test. [§19.303 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
11. The permittee shall maintain continuous records which demonstrate compliance with Specific Condition #10. 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. [§19.705 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, and 40 CFR Part 64]

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12. 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. [§19.705 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, and 40 CFR Part 64]
13. The permittee shall maintain continuous records of 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. [§19.705 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, and 40 CFR Part 64]
14. The permittee shall test one RTO in SN-01 every five years for PM₁₀, NO_x, and VOC emissions using EPA Reference Methods 5, 7E, 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. [§19.702 of Regulation #19, §19.901 et seq. of Regulation #19, and 40 CFR Part 52, Subpart E]
15. The permittee shall test one RTO in SN-01 every five years 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. [§18.1002 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
16. The permittee shall test both RTOs in SN-01 annually for CO emissions using EPA Reference Method 10. 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. [§19.702 of Regulation #19, §19.901 et seq. of Regulation #19, and 40 CFR Part 52, Subpart E]

**SN-01A
Thermal Oil Heaters**

Source Description

The Thermal Oil System (SN-01A) provides heat to the press section (SN-02) where the flakes are compressed to form the board. The thermal oil system that is used to heat the press to the appropriate temperature consists of two wood-fueled, suspension type burners, rated at 40 MMBTU/hr each. Exhaust from these burners is routed through the regenerative thermal oxidizer (SN-01) under normal operating conditions.

However, there are two 30 MMBTU/hr natural gas-fired burners included in the thermal oil system for back-up purposes. These back-up burners would be used to keep the oil within the system warm when the plant is down or in the event the RTOs show signs of back-pressuring due to expected gradual media deterioration within the RTO. Emissions associated with the combustion of natural gas used to power the back-up burners are vented to the atmosphere when in use.

This source quantifies the emissions from the natural gas combustion vented to the atmosphere. Compliance will be shown by using only natural gas when venting directly to the atmosphere.

Specific Conditions

17. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #20 and equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.3	1.0
SO ₂	0.1	0.1
VOC	0.2	0.8
CO	3.1	13.3
NO _x	3.0	13.2

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18. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #20 and equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.3	1.0

19. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this condition is burning only natural gas whenever venting to the atmosphere. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
01A	10%	§18.501 of Regulation #18

20. When venting to the atmosphere, only natural gas may be used as fuel in the Thermal Oil Heaters. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]
21. The permittee shall maintain records of when the Thermal Oil Heaters are vented to the atmosphere and when natural gas was the fuel burned. These records shall be kept on site, updated monthly, provided to Department personnel upon request, and may be used by the Department for enforcement purposes. [§19.705 of Regulation #19, §19.901 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

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 have been determined to be a shared system of multiclones followed by a Thermal Catalytic Oxidizer (TCO).

Because uncontrolled emissions at this source would be greater than 100 tons per year for PM₁₀, VOC, CO, and NO_x, this source is subject to Compliance Assurance Monitoring (CAM). The CAM plan for this source is monitoring of temperature and air flow, using operational status indicators of the static pressure of each ID fan and the isolation damper position status, and keeping records to demonstrate compliance. Optimal temperature, air flow, static pressure, and damper position values have been determined using stack testing.

Specific Conditions

22. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #28, #30, #34, #35, Plantwide Condition #7, and equipment limitations. [§19.901 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

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

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23. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #28, #30, #34, #35, Plantwide Condition #7, and equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	3.5	15.5
Acetaldehyde	0.06	0.24
Formaldehyde	1.00	4.40
Methanol	5.14	22.50
Phenol	0.74	3.24

24. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
02	10%	§18.501 of Regulation #18

25. The permittee shall conduct weekly observations of the opacity from source SN-02 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

26. Visible emissions may not exceed the limits specified in the following table of this permit during off-line maintenance functions (i.e., the modified bakeout of the oxidizers) as measured by EPA Reference Method 9. [40 CFR Part 52, Subpart E]

SN	Limit	Regulatory Citation
02	20%	§19.503 of Regulation #19

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27. The permittee shall conduct daily observations of the opacity from SN-02 during off-line maintenance functions and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§19.503 of Regulation #19 and 40 CFR Part 52, Subpart E]
28. The Press TCO/RTO (SN-02) shall be operated at the minimum temperature set point of 800 °F when operated as a TCO and 1,505 °F when operated as an RTO. [§19.303 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311]
29. The permittee shall maintain continuous records which demonstrate compliance with Specific Condition #28. 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. [§19.705 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, and 40 CFR Part 64]
30. The TCO/RTO shall have a maximum volumetric flow rate of 120% of the maximum air flow established during the compliance test. [§19.303 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
31. The permittee shall maintain continuous records which demonstrate compliance with Specific Condition #30. 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. [§19.705 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, and 40 CFR Part 64]
32. 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. [§19.705 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, and 40 CFR Part 64]

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33. The permittee shall maintain continuous records of 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. [§19.705 of Regulation #19, §19.901 et seq. of Regulation #19, 40 CFR Part 52, Subpart E, and 40 CFR Part 64]
34. The permittee shall test the TCO in SN-02 every five years 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. [§19.702 of Regulation #19, §19.901 et seq. of Regulation #19, and 40 CFR Part 52, Subpart E]
35. The permittee shall test the TCO in SN-02 every five years 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. [§18.1002 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

36. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.901 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	2.7	11.6
VOC	7.8	34.2

37. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	2.7	11.6
Methanol	0.06	0.27

38. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
03	10%	§18.501 of Regulation #18

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39. The permittee shall conduct weekly observations of the opacity from source SN-03 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

40. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.901 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	2.1	9.0

41. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	2.1	9.0

42. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
04	10%	§18.501 of Regulation #18

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43. The permittee shall conduct weekly observations of the opacity from source SN-04 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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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

44. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.901 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	3.8	16.3

45. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	3.8	16.3

46. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
05	10%	§18.501 of Regulation #18

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47. The permittee shall conduct weekly observations of the opacity from source SN-05 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

48. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.901 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	1.3	5.7
VOC	4.2	18.0

49. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	1.3	5.7
Formaldehyde	0.03	0.11
Methanol	0.13	0.54

50. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
06	10%	§18.801 of Regulation #18

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51. The permittee shall conduct weekly observations of the opacity from source SN-06 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

52. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.5	1.9
VOC	4.2	18.0

53. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.5	1.9
Formaldehyde	0.03	0.11
Methanol	0.13	0.54

54. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
07	10%	18.501 of Regulation #18

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55. The permittee shall conduct weekly observations of the opacity from source SN-07 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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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

56. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.901 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	1.2	5.3
VOC	8.9	39.0

57. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	1.2	5.3
Formaldehyde	0.25	1.08
Methanol	4.32	18.90

58. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
08	10%	18.501 of Regulation #18

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59. The permittee shall conduct weekly observations of the opacity from source SN-08 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

60. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.901 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	2.7	11.6

61. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	2.7	11.6

62. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
09	10%	§18.501 of Regulation #18

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63. The permittee shall conduct weekly observations of the opacity from source SN-09 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-10

Non-Stack Emission Sources

Source Description

The material handling operations responsible for non-stack emissions include Debarker (PM), Bark Hog (PM), Blend House (VOC/Formaldehyde), Finished Product Storage (VOC/Formaldehyde), Edge Sealing of boards outside Spray Booth (PM), Resin Storage Tanks (VOC/Formaldehyde), Paved Roads (PM), Unpaved Roads (PM), Outside Bark Storage Area (PM), and Overlay Application Process (VOC/HAPS).

Specific Conditions

64. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.901 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	31.9	68.6
VOC	1.0	4.0

65. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	103.9	266.3
Acetaldehyde	0.18	0.79
Formaldehyde	0.11	0.51
Methanol	0.05	0.20
Vinyl Acetate	0.36	1.58

66. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [40 CFR Part 52, Subpart E]

SN	Limit	Regulatory Citation
10	20%	§19.503 of Regulation #19

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67. The permittee shall conduct weekly observations of the opacity from source SN-10 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§19.503 of Regulation #19 and 40 CFR Part 52, Subpart E]
68. The permittee may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. The permittee must use either the emission rate without add-on controls option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limit in §63.4690 and must use no thinner or cleaning material that contains organic HAP as determined according to this section. Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in §63.4692 and §63.4693, respectively.

To demonstrate initial compliance with the emission limitations using the compliant material option, the permittee must meet all the requirements of this section for the coating operation or group of coating operations using this option. Use the procedures in this section on each coating, thinner, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. The permittee does not need to redetermine the mass of organic HAP in coatings, thinners, or cleaning materials that have been reclaimed onsite and reused in the coating operation(s) for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option. If the mass fraction of organic HAP of a coating equals zero, determined according to paragraph (a) below, and you use the compliant material option, the permittee is not required to comply with paragraphs (b) and (c) of this section for that coating. [40 CFR 63.4741]

- (a) Determine the mass fraction of organic HAP for each material used. The permittee must determine the mass fraction of organic HAP for each coating, thinner, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of this section.
- (1) Method 311 (appendix A to 40 CFR part 63). The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test. If these values cannot

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be determined using Method 311, the owner or operator shall submit an alternative technique for determining their values for approval by the Administrator.

- (i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and at 1.0 percent by mass or more for other organic HAP compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (e.g., 0.379178412 truncates to 0.3791).
- (ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763).

[Regulation No. 18 §18.801 *et seq.* and 40 CFR §63.4741]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Georgia-Pacific Wood Products, LLC Fordyce OSB 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.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [§19.704 of Regulation #19, 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]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [§19.410(B) of Regulation #19 and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [§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]
4. The permittee must provide: [§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]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment.
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [§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]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation #26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. 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. [§19.901 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

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8. 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. [§19.705 of Regulation #19, §19.901 et seq., and 40 CFR Part 52, Subpart E, and 40 CFR Part 52 Subpart E]
9. Prior to April 1, 2008, the facility shall submit an application to the Department which addresses all applicable requirements of 40 CFR 63, Subpart DDDD, National Emissions Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products.

Title VI Provisions

10. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [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.
11. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
 - 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.

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- 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.
12. 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.
13. 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.
14. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

Permit Shield

15. 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 the following table of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated December 2003.

Applicable Regulations

Source No.	Regulation	Description
Facility	Regulation #19	Regulations of the Arkansas Plan of Implementation for Air Pollution Control
Facility	Regulation #26	Regulations of the Arkansas Operations Air Permit Program
Facility	40 CFR 64	Compliance Assurance Monitoring

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The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated December 2003.

Inapplicable Regulations

Source No.	Regulation	Description
SN-01	40 CFR Part 60, Subpart Db	In a memorandum dated November 19, 1992, the US EPA concluded that NSPS Subparts Db and Dc do not apply to process dryers.
SN-01	40 CFR Part 60, Subpart Dc	In a memorandum dated November 19, 1992, the US EPA concluded that NSPS Subparts Db and Dc do not apply to process dryers.

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SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation #26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated November 15, 2006 and a letter dated February 14, 2007.

Description	Category
Portable Heaters	A-1
Used Oil Tank	A-2
Coolant Tank	A-2
Fire Pump Diesel Tank	A-3
Diesel Fueling Tank	A-3
Emergency Generator Diesel Tank	A-3
Gasoline Fueling Tank	A-3
Thermal Oil Tank	A-3
Kerosene Tank	A-3
Maintenance Welding and Cutting	A-7
Emergency Generator	A-13

SECTION VIII: GENERAL PROVISIONS

1. 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. [40 CFR 70.6(b)(2)]
2. 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. [40 CFR 70.6(a)(2) and §26.701(B) of Regulation #26]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will 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. [§26.406 of Regulation #26]
4. 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, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and §26.701(A)(2) of Regulation #26]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) of Regulation #26]
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing 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.

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6. The permittee must retain the records of all required monitoring data and support information for at least five (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. [40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) of Regulation #26]
7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. The permittee shall make an initial report 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 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.

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The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee 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 the report will serve as both the initial report and full report. [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]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will 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. [40 CFR 70.6(a)(5), §26.701(E) of Regulation #26, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. 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, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and §26.701(F)(1) of Regulation #26]
11. 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 to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and §26.701(F)(2) of Regulation #26]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and §26.701(F)(3) of Regulation #26]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26]
14. The permittee must 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 must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and §26.701(F)(5) of Regulation #26]

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15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and §26.701(G) of Regulation #26]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and §26.701(H) of Regulation #26]
17. If the permit allows 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 operational scenario. [40 CFR 70.6(a)(9)(i) and §26.701(I)(1) of Regulation #26]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and §26.702(A) and (B) of Regulation #26]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in §26.2 of Regulation #26. [40 CFR 70.6(c)(1) and §26.703(A) Regulation #26]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and §26.703(B) of Regulation #26]
 - 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 required 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 assuring compliance with this permit or applicable requirements.
21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department.

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All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and §26.703(E)(3) of Regulation #26]

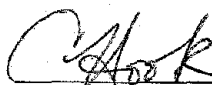
- a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting 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. Nothing in this permit will alter or affect the following: [§26.704(C) of Regulation #26] The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section; the liability of the permittee 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 §408(a) of the Act or, the ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

CERTIFICATE OF SERVICE

I, Cynthia Hook, hereby certify that a copy of this permit has been mailed by first class mail to

Georgia-Pacific Oriented Strandboard Facility, PO Box 1095, Fordyce, AR, 71742, on this

21ST day of June, 2007.



Cynthia Hook, AAIL, Air Division

