ADEQ
OPERATING
AIR PERMIT

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

Permit #: 118-AOP-R3
IS ISSUED TO:
Renewal #1
West Fraser (South), Inc. - Huttig Mill
501 Olin Avenue
Huttig, AR 71747
Union County
CSN: 70-0013

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:

and

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

_____

Keith A. Michaels Date Amended

SECTION I: FACILITY INFORMATION

PERMITTEE:	West Fraser (South), Inc. - Huttig Mill
CSN:	70-0013
PERMIT NUMBER:	118-AOP-R3
FACILITY ADDRESS:	501 Olin Avenue Huttig, AR 71747
COUNTY:	Union
CONTACT POSITION:	Herman Boykin, Mill Manager
TELEPHONE NUMBER:	(870) 943-2211
REVIEWING ENGINEER:	Wesley Crouch
UTM North-South (Y):	Zone 15: 3655.8
UTM East-West (X):	Zone 15: 567.5

SECTION II: INTRODUCTION

Summary of Permit Activity

West Fraser (South), Inc. owns and operates a sawmill at 501 Olin Avenue in Huttig, Arkansas. The sawmill produces pine lumber and wood chips. This is the renewal for the facility's Title V permit. This permit allows SN-08 to be moved to the insignificant activities list and removal of the overs chipper cyclone (SN-04).

Process Description

Logs received by truck are weighed and inspected to determine volume and value. The logs are then taken to the log storage area. Typically, the outdoor log piles are sprayed with water to maintain a high moisture content. At the Sawmill, logs are loaded onto the saw deck. Ring debarkers remove the outer layers of wood and bark. The logs are then cut to length prior to entering the Sawmill. The bark and wood waste produced in this area are conveyed to the Boiler Fuel Storage Silo for use as boiler fuel. Log ends produced by the saws are sent to a chipper. The chips are screened and then loaded into trucks for sale.

The debarked logs are sawn into lumber, edged, and sorted. The larger edge scraps are remanufactured into lumber. The remaining edge scraps are routed from the Sawmill to chippers and are converted into wood chips. The chips are screened and then loaded out for sale. Oversized chips are sent to the Overs Rechipper and then loaded into trucks for sale.

Green sawdust and fines generated at the Sawmill by the sawing and chipping processes are collected by two cyclones, one located at the Boiler Fuel Storage Silo (SN-02) and the other located at the Sawmill truck loading bin (SN-03).

Green lumber from the Sawmill is sorted and stacked prior to kiln drying. The lumber is then dried in one of three lumber kilns (SN-9, SN-10, and SN-20) or one of the three proposed new kilns (SN-21 through SN-23). From the kilns, the dried lumber is transferred to the cooling shed and then to the Planermill. In the Planermill, the dried lumber is planed, graded, packaged, and stored prior to shipment off-site. The dry shavings produced in the Planermill by the planing process are collected by a cyclone (SN-05) at the Planermill truck loading bin.

Wood residues generated on-site or purchased are used as the primary fuel in the existing boiler (SN-01) or in the proposed boiler (SN-24). Metal filing and grinding activities are also conducted at the Huttig Mill to repair saws and knives. These emissions are considered

insignificant. There is one gasoline tank (SN-18) at the mill, which stores gasoline for company vehicle use.

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Regulations

The facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Air Code), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (SIP), and the *Regulations of the Arkansas Operating Air Permit Program* (Title V) because it emits over 100 tons per year of a criteria pollutant. **The facility is considered a major stationary source under the Prevention of Significant Deterioration (PSD) regulations as found in 40 CFR 52.21. As described below and throughout the permit, the facility is subject to PSD requirements.** 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 No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	74.6	325.9	
		PM_{10}	72.7	317.3	
		SO_2	3.8	16.2	
		VOC	97.0	424.8	
		CO	84.2	368.9	
		NO_x	34.9	152.9	
HAPs*		Mercury	5.76E-03	2.56E-02	
		Chlorine	0.2	0.6	
		Methanol	5.4	23.6	
		Acrolein	0.0014	0.0076	
		Formaldehyde	0.5	2.1	
		Arsenic	0.0012	0.0038	
		Beryllium	0.003	0.011	
		Cadmium	0.0003	0.0011	
		Chromium VI	0.0011	0.0036	
		Lead	0.004	0.018	
		Manganese	0.11	0.49	
		Phosphorus	0.025	0.101	

01	Kipper Boiler	PM	57.6	252.0	16
		PM_{10}	57.6	252.0	
		SO_2	3.0	12.9	
		VOC	2.1	8.8	
		$CONO_x$	75.326.0	330.0114	
		Mercury	4.60E-3	.0	
		Chlorine	0.1	2.02E-02	
		Acrolein	0.001	0.5	
		Formaldehyde	0.04	0.006	
		Arsenic	0.001	0.18	
		Beryllium	0.002	0.003	
		Cadmium	0.0002	0.009	
		Chromium VI	0.001	0.0009	
		Lead	0.003	0.003	
		Manganese	0.09	0.014	
		Phosphorus	0.02	0.39	
				0.08	
02	Boiler Fuel Bin Cyclone	PM	0.8	3.4	19
		PM_{10}	0.7	2.7	
03	Sawmill Loading Bin Cyclone				
04	Overs Chipper Cyclone	Source Removed			
05	Planer Mill Cyclone	PM	9.0	39.4	21
		PM_{10}	7.2	31.5	
07	Dry Waste Shavings Bin Cyclone	Source Removed			
08	Filing Room Cyclone	moved to insignificant activities list			
09	High-Temperature Kiln (18 roof vents)				23
10	High-Temperature Kiln (18 roof vents)	VOC	91.9	403.0	
		Formaldehyde	0.42	1.84	
20	High-Temperature	Methanol	5.4	23.6	

through 23	Kilns (18 roof vents)				
24	Wellons Boiler	PM	7.2	31.1	25
		PM_{10}	7.2	31.1	
		SO_2	0.8	3.3	
		VOC	3.0	13.0	
		CO	8.9	38.9	
		NO_x	8.9	38.9	
		Mercury	1.16E-03	5.06E-03	
		Chlorine	0.1	0.1	
		Acrolein	0.0004	0.0016	
		Formaldehyde	0.01	0.04	
		Arsenic	0.0002	0.0008	
		Beryllium	0.001	0.002	
		Cadmium	0.0001	0.0002	
		Chromium 6	0.0001	0.0006	
		Lead	0.001	0.004	
		Manganese	0.02	0.1	
		Phosphorus	0.005	0.021	

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

SECTION III: PERMIT HISTORY

Permit **118-A** was the initial air permit for Manville Forest Products. The permit was issued on May 26, 1972 for the installation of a 80,000 lb/hr steam boiler equipped with sand classifier and multiclone dust collector.

Permit **118-AR-1** was issued to Manville Forest Products on March 26, 1982. The facility modified the existing permit, 118-A, to include the following changes:

1. Incorporate the purchase of a sawmill and plywood mill formerly owned by Olinkraft Corporation.
2. Install new equipment and reconfigure existing equipment in order to decrease particulate matter emissions.

Permit **118-AR-2** was issued to Riverwood International (Div. of Manville Corporation) on November 13, 1991. The facility modified the existing permit, 118-AR-1, to update and consolidate the permit to include all sources located at the facility.

Permit **118-AR-3** was issued to Plum Creek Manufacturing, L.P. on March 11, 1997. The facility modified the existing permit, 118-AR-2, to include the following changes:

1. Incorporate the purchase of Riverwood International by Plum Creek Manufacturing.
2. Incorporate latest data for VOC emissions from lumber drying kilns;
3. Re-identify point sources in numerical order;
4. Increase the hours of operation;
5. Re-permit particulate emissions (PM/PM_{10}) from wood handling cyclones incorporating latest AP-42 data.

Air permit **118-AOP-R0** is the initial operating permit for this facility. No physical modification or change in the method of operation prompted the issuance of this permit. In this permit, the facility is including the hazardous air pollutant (HAP) emissions associated with the Kipper Boiler (SN-01) and deleting the Dry Waste Transfer Cyclone (SN-06).

Air permit **118-AOP-R1** was issued on March 16, 2001. The facility modified their permit to remove seven conventional kilns and install one new, high temperature lumber kiln. Emissions and production levels remained unchanged.

Air Permit **118-AOP-R2** was issued on November 7, 2002. The facility modified their permit to install a new wood fired boiler, three additional high temperature drying kilns, and to increase the production capacity from 147,000 thousand board feet per year to 230,000 thousand board

feet per year. Also, the facility removed SN-07 from service and change the method in which the particulate emissions from the cyclone are calculated. This modification resulted in an increase of 68.8 tpy of VOC.

Prevention of Significant Deterioration

As a part of the PSD review for the Huttig mill, a Best Available Control Technology (BACT) analysis was required. A BACT determination is a case-by-case analysis that addresses the technological question of whether a proposed control technique can be considered BACT for the particular application or whether a more stringent level of emission control should be used. This determination involves an assessment of the availability of applicable technologies capable of sufficiently reducing a specific pollutant emission, as well as weighing the economic, energy, and environmental impacts using each technology.

The methodology used by the permittee to determine BACT followed the "top-down" approach. The "top-down" BACT contains the following elements:

- Determination of the most stringent control alternatives potentially available.
- Discussion of the technical and economic feasibility of each alternative.
- Assessment of energy and environmental impacts, including toxic and hazardous pollutant impacts, of feasible alternatives.
- Selection of the most stringent control alternative that is technically and economically feasible and that provides the best overall control of all pollutants.

The selected BACT must be at least as stringent as New Source Performance Standards for the source.

A BACT analysis was performed for each regulated pollutant emitted in amounts that exceed the PSD significance levels. BACT applies to each emissions unit at which a significant net emissions increase in the pollutant would occur as a result of a physical change or change in the method of operation in the unit. Therefore, the BACT analysis for the Huttig mill considers emission controls for PM, PM_{10}, and VOC. The following sources were required to undergo a BACT analysis:

- High Temperature Drying Kilns (SN-20 through SN-23)
- Wellons Boiler (SN-24)

BACT Analysis for High Temperature Drying Kilns

VOC

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The permittee proposed the following as possible VOC control options:

-Thermal oxidation
-Catalytic incineration
-Condensation
-Biofiltration
-Proper design and operation of kilns

The permittee states that add-on control devices are technically infeasible for drying kilns due to the inherent variability of lumber kiln vent flow rate, composition, and temperature. Attempts to direct the kiln vent air flows to an emission control device would disrupt the necessary ventilation and circulation patterns necessary to maintain proper moisture content and temperature during the various drying cycle stages. This makes thermal oxidation, catalytic incineration, condensation, and biofiltration technically infeasible control options. Therefore, proper design and operation of kilns qualifies as BACT for the VOC emissions from the high temperature drying kilns. The Huttig mill has chosen a BACT limit of 3.5 lb/MBf. This limit is lower than any current value in the RBLC.

BACT Analysis for Wellons Boiler

The following is a list of potential control technologies that were considered for reduction of emissions from the Wellons boiler.

CO
Catalytic Oxidation
Thermal Oxidation
Good Combustion Practice

NO_x
Selective Catalytic Reduction (SCR)
$SCONO_x$
Selective Non-Catalytic Reduction (SNCR)
Overfire Air/Low NO_x Combustion System

PM/PM_{10}
Fabric Filter Baghouse
Electrostatic Precipitator (ESP)
Multiple Cyclones (multiclones)

VOC

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Catalytic Oxidation
Thermal Oxidation
Good Combustion Practice

An analysis of the technical feasibility of these control options showed that catalytic oxidation is technically infeasible as a control for VOC and CO. If a catalyst bed were installed on the Wellons boiler exhaust, particulate matter would blind the catalyst pores and potentially poison the catalyst. Also, supplemental heating would be required to raise the exhaust temperature (initially at 350 EF) into the effective catalytic temperature range (400 to 800 EF). This would result in increased levels of combustion pollutants. SCONOx and SCR were also ruled technically infeasible due to catalyst poisoning. SCR has the added difficulty of controlling the ammonia feedrate. Maintaining the necessary control would require unique and advanced controls that have not been demonstrated for this application. Finally, a baghouse cannot be used for particulate control for wood fired boilers since the boiler exhaust contains fine cinders that would burn through the bags and could potentially ignite the filter cake.

The remaining control technologies are:

Pollutant	**Control technology**	**Potential control efficiency**
CO	Thermal oxidation Good combustion practice	60-90% Base case
NO_x	SNCR Overfire air/low NO_x combustion system	50-75% Base case
PM/PM_{10}	ESP Multiclones	99.9% Base Case
VOC	Thermal oxidation Good combustion practice	60-90% Base case

These remaining technologies were evaluated on the basis of economic, energy, and environmental considerations.

CO and VOC control technologies:
Thermal Oxidation

Thermal oxidizers require operating temperatures in the 1,200 to 2,000 EF range to insure conversion of CO to CO_2. The exhaust from the Wellons boiler will be at 350 EF. Thus, a

substantial amount of heat would be required to raise the exhaust temperature to the thermal oxidation temperature range. Thermal oxidation is considered infeasible for CO and VOC control for the Wellons boiler.

Good Combustion Practice

If sufficient combustion air supply, temperature, residence time and mixing are incorporated into the combustion design and operation, CO and VOC emissions are minimized. The Wellons boiler will be equipped with controls to adjust for changes in air and fuel conditions. Good combustion is the industry standard CO and VOC control method for wood fired boilers. The RBLC lists this option as the only BACT control method. West Fraser proposes good combustion practice as BACT for the Wellons boiler. The proposed BACT limits are 0.3 lb/MMBtu for CO and 0.1 lb/MMBtu for VOC.

NO_x Control Technologies
Selective Non-Catalytic Reduction (SNCR)

SNCR requires an operating temperature range of 1,600 to 2,000 EF. The exhaust from the Wellons boiler will be 350 EF. Therefore, additional fuel would need to be combusted to raise the exhaust temperature above 1,600 EF. SNCR is infeasible for NO_x control for the Wellons boiler due to associated negative environmental impacts.

Overfire Air/Low NO_x Combustion System

The Wellons boiler will be equipped with an overfire air/low NO_x combustion system. This is the only type of control listed in the RBLC for NO_x . West Fraser proposes a BACT limit of 0.3 lb/MMBtu.

PM/PM_{10} Control Technologies
Electrostatic Precipitator (ESP)

Even though it may be theoretically possible to install an ESP on a boiler this small, there is no record of one being installed on a boiler less than 50 MMBtu/hr. (The RBLC list sources at a Louisiana-Pacific facility in Maine with a heat input of 24.6 MMBtu/hr that use ESPs to control particulate emissions. This ESP actually controls emissions from these sources combined giving a total heat input to 54.2 MMBtu/hr.) An ESP on this boiler is estimated to cost $6,126 per ton of particulate removed. Considering the lack of ESP on similar sized boilers, the small amount

of particulate it would remove, and the cost, an ESP has been determined not to be feasible for this boiler.

Multiple Cyclones (Multiclones)

The Wellons boiler will be equipped with a multiclone rated at 80% efficiency by the vendor. West Fraser proposes multiclones as BACT with a proposed BACT emission rate of 0.24 lb/MMBtu.

BACT Summary

The following control technologies are considered BACT for the Wellons boiler.

Pollutant	BACT	BACT emission limit (lb/MMBtu)
CO	Good Combustion Practice	0.3
NO_x	Overfire Air/Low NO_x Combustion	0.3
PM_{10}	Multiclones	0.24
VOC	Good Combustion Practice	0.1

Air Quality Analysis

In the significance analysis, the maximum ground-level concentrations of PM_{10}, NO_2, and CO resulting from the proposed project are estimated. These maximum impacts are compared to the applicable MSLs. If the emissions of a particular pollutant are shown to have a significant impact, a full impact analysis is required for that pollutant. For this air quality analysis, PM_{10} is the only pollutant with impacts above an applicable MSL. The following table lists the results of the analysis.

Pollutant	Averaging Period	Year of Maximum Impact (Grid)	Location of Maximum		Maximum Modeled Concentration(Fg/m^3)	Modeling Significance Level (Fg/m^3)
			UTM East (m)	UTM West (m)		
PM_{10}	24-hour	1999 (fine)	576,466.1	3,655,725	21.2	5

	Annual	1996 (fine)	576,579.3	3,656,774	1.81	1.0
NO_x	Annual	1996 (fine)	576,579.3	3,656,774	0.82	1.0
CO	1-hour	2000 (fine)	576,915	3,655,665	59.7	2,000
	8-hour	1997 (fine)	576,878.1	3,656,500	30.7	500

PM_{10} NAAQS Analysis

Results of the multi-source modeling showed that the net emissions from the proposed modifications to this facility do not result in a significant ambient impact for any modeled pollutant at any point in the modeled domain. Outside of this property boundary, the NAAQS were not exceeded for PM_{10} emissions. The table below summarizes the NAAQS modeling results.

Averaging Period	Year of Maximum Impact	Location of Maximum		Maximum Modeled Concentration (Fg/m^3)	Total Concentration (Fg/m^3)	NAAQS (Fg/m^3)
		UTM East (m)	UTM West (m)			
24-hour	2000	576,353.9	3,655,834	42.5	94.5	150
Annual	1998	576,286.6	3,656,073	6.46	30.9	50

PSD Increment

Results of the multi-source modeling showed that the net emissions from the proposed modifications to this facility do not result in a significant ambient impact for any modeled pollutant at any point in the modeled domain. The maximum contribution by the proposed West Fraser was 24.1 μg/m^3. This contribution represents 80% of the 30 μg/m^3 available for PM_{10} using the highest second high modeling results and is therefore not a limiting factor in the construction of the proposed facility. The table below summarizes the PSD Increment modeling results. The Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) states in Section 19.904(C)(4) that an air quality impact analysis is required to also verify that no individual major source would result in the consumption of 50% of any available annual increment or 80% of any short term increment. Each pollutant's contribution is below the Regulation 19 requirements.

Averaging	Year of		Maximu	PSD	% of

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Period	Maximum Impact	Location of Maximum		m Modeled Concentration (Fg/m^3)	Class II Increment (Fg/m^3)	Increment
		UTM East (m)	UTM West (m)			
24-hour	1999	576,329.5	3,655,829	24.1	30	80
Annual	1999	576,286.6	3,656,073	-0.35	17	0

Additional Impacts Analysis

PSD permits are required to assess the impacts of air, ground, and water pollution on soils, vegetation, and visibility caused by any increase in emissions of any regulated pollutant from the source or modification under review, and from associated growth.

Growth Analysis

Although West Fraser is proposing a large increase in the facility's lumber production, the additional labor necessary to facilitate the expansion is small. The only additional effect of this project is the slightly increased truck traffic needed to supply and ship from the Huttig Mill. The anticipated industrial, commercial, and residential growth in the local area due to this project is negligible.

Class I Area and Visibility Analysis

The nearest Class I area is the Caney Creek Wilderness Area located in southwestern Arkansas. It is located more than 180 kilometers from the Huttig Mill. Since the Class I area is more than 100 kilometers away, no further Class I area analysis is required.

Soils and Vegetation Analysis

As demonstrated by the ambient impact analysis, the maximum ambient impacts from the expansion are below the secondary NAAQS. Thus, it can be concluded that any impact on soil and vegetation will be negligible.

SECTION IV: EMISSION UNIT INFORMATION

SN-01
Kipper Boiler

Source Description

Source SN-01 is a wood fired boiler that produces steam for the facility. The Kipper Boiler is rated by the manufacturer at 80,000 pounds per hour (lb/hr) of steam production. Test results from January 1992 indicate that the actual heat capacity of the boiler is 118 million British thermal units per hour (MMBtu/hr). Particulate emissions from this source are controlled by a cyclone with an efficiency of 80% for PM_{10} emissions. This equipment was installed in 1972.

Specific Conditions

3. Pursuant to §19.501 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 through compliance with Specific Condition #5.

Pollutant	lb/hr	tpy
PM_{10}	57.6	252.0
SO_2	3.0	12.9
VOC	2.1	8.8
CO	75.3	330.0
NO_X	26.0	114.0

4. 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 through compliance with Specific Condition #5.

Pollutant	lb/hr	tpy
PM	57.6	252.0

Mercury	4.6E-03	2.02E-2
Chlorine	0.1	0.5
AcroleinFormaldehyd	0.0010.04	0.0060.18
e	0.001	0.003
Arsenic	0.002	0.009
Beryllium	0.0002	0.0009
Cadmium	0.001	0.003
Chromium VI	0.003	0.014
Lead	0.09	0.39
Manganese	0.02	0.08
Phosphorus		

5. Pursuant to §19.503 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-01. Compliance shall be demonstrated through compliance with Specific Condition #4.

6. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-01 shall be conducted by a person trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.

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

7. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not exceed an average of 80,000 pounds per hour of steam production in any consecutive seven day period from the boiler. Compliance shall be demonstrated through compliance with Specific Condition #6.

8. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain a strip chart recorder on SN-01 and maintain records which demonstrate compliance with the steam production limit set in Specific Condition 5. These records shall be updated on a weekly basis, kept on site, and provided to Department personnel upon request. An annual total and each individual week's data shall be submitted in accordance with General Provision 7.

SN-02 & SN-03
Boiler Fuel Bin and Sawmill Loading Bin Cyclone

Source Description

Source SN-02 is a fuel bin which houses the wood residues used as fuel for the Kipper Boiler. Green sawdust and fines generated at the Sawmill by the sawing and chipping processes are collected by two cyclones, one of the cyclones is located at the Boiler Fuel Storage Silo and the other is located at the Sawmill Loading Bin. This equipment was installed in 1983. SN-03 is a loading bin where trucks are loaded with wood chips that are produced in the Sawmill. Green sawdust and fines generated at the Sawmill by the sawing and chipping processes are collected by two cyclones, one of the cyclones is located at the Sawmill truck loading bin. This equipment was installed in 1983. These sources share a single blower and cannot operate simultaneously.

Specific Conditions

9. Pursuant to §19.501 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 through compliance with Specific Condition #11.

SN	Pollutant	lb/hr	tpy
02 03	PM_{10}	0.7	2.7

10. 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 through compliance with Specific Condition #11.

SN	Pollutant	lb/hr	tpy
02 03	PM	0.8	3.4

11. Pursuant to §19.503 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-02 or SN-03. Compliance shall be demonstrated through compliance with Specific Condition #10.

12. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-02 and SN-03 shall be conducted by a person trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.

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

13. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall perform testing of this source to verify the emission rates listed above. This testing shall be performed within 180 days of permit issuance. A copy of these test results shall be maintained on site. A copy of the testing results shall be submitted to the Department in accordance with Plantwide Condition #3.

SN-05
Planer Mill Cyclone

Source Description

In the Planermill, the dried lumber is planed, graded, packaged, and stored prior to shipment off-site. The dry shavings produced in the Planermill by the planing process are collected by a cyclone (SN-05) at the Planermill truck loading bin.

Specific Conditions

14. Pursuant to §19.501 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 through compliance with Specific Condition #16.

Pollutant	lb/hr	tpy
PM_{10}	7.2	31.5

15. 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 through compliance with Specific Condition #16.

Pollutant	lb/hr	tpy
PM	9.0	39.4

16. Pursuant to §19.503 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-05. Compliance shall be demonstrated through compliance with Specific Condition #15.

17. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-05 shall be conducted by a person trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with

this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.

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

18. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall perform testing of this source to verify the emission rates listed above. This testing shall be performed within 180 days of permit issuance. A copy of these test results shall be maintained on site. A copy of the testing results shall be submitted to the Department in accordance with Plantwide Condition #3.

SN-09, 10, and 20-23
High Temperature Kilns

Source Description

Green lumber from the Sawmill is sorted and stacked prior to kiln drying. The lumber is then dried in one of 6 steam heated lumber kilns (SN-09, SN-10, and SN-20 through SN-23). From the kilns, the dried lumber is transferred to the cooling shed and then to the Planermill. The lumber kilns emit naturally occurring volatile organic compounds which would be emitted during the natural growth process of a tree. Lumber kiln SN-09 was last modified in 1986, and lumber kiln SN-10 was last modified in 1988. Lumber kilns SN-21, -22, and -23 are being installed through this modification.

Specific Conditions

19. Pursuant to §19.501 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 through compliance with Specific Condition #19.

Pollutant	lb/hr	tpy
VOC	91.9	403.0

20. 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 through compliance with Specific Condition #19.

Pollutant	lb/hr	tpy
Methanol Formaldehyde	5.4 0.42	23.6 1.84

21. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not exceed 230 million board feet per year based on a rolling twelve month total for sources SN-09, SN-10, and SN-20 through SN-23. Compliance shall be demonstrated through compliance with Specific Condition #20.

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

SN-24
Wellons Boiler

Source Description

Source SN-24 is a wood fired boiler that produces steam for the facility. The Wellons Boiler is a 29.63 MMBtu/hr. Particulate emissions from this source are controlled by a cyclone with an efficiency of 80% for PM_{10} emissions.

Specific Conditions

23. Pursuant to §19.501 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 through compliance with Specific Condition #25.

Pollutant	lb/hr	tpy
PM_{10}	7.2	31.1
SO_2	0.8	3.3
VOC	3.0	13.0
CO	8.9	38.9
NO_X	8.9	38.9

24. 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 through compliance with Specific Condition #25.

Pollutant	lb/hr	tpy
PM	7.2	31.1

Mercury	1.16E-03	5.06E-03
Chlorine	0.1	0.1
Acrolein	0.0004	0.0016

Formaldehyde	0.01	0.04
Arsenic	0.0002	0.0008
BerylliumCadmium	0.0010.0001	0.0020.0002
Chromium 6	0.0001	0.0006
Lead	0.001	0.004
Manganese	0.02	0.1
Phosphorus	0.005	0.021

25. Pursuant to §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall demonstrate compliance with the following limits. Compliance shall be demonstrated through compliance with Specific Condition #24.

Pollutant	**Emission Limit (lb/MMBtu)**
CO	0.3
NO_x	0.3
PM_{10}	0.24
VOC	0.1

26. Pursuant to §19.702 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall test the exhaust stack of the boiler in order to show compliance with the criteria pollutant emission limits contained in this permit. The exhaust shall be tested for particulate matter, nitrogen oxide, carbon monoxide, and volatile organic compound emissions and opacity. All emissions shall be measured with an approved test method. EPA Reference Methods 5, 7E, 10, and 25A shall be used to determine particulate matter, nitrogen oxide, carbon monoxide, and volatile organic compound concentrations respectively. EPA Reference Method 9 shall be used to determine opacity. The test shall be performed within 180 days of start-up of the source, and the permittee shall give the Department written notification of the scheduled date of compliance testing at least fifteen calendar days in advance.

27. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not exceed an average of 20,700 pounds per hour of steam production in any consecutive seven day period from the boiler. Compliance shall be demonstrated through compliance with Specific Condition #26.

28. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain a strip chart recorder on SN-24 and maintain records which demonstrate compliance with the steam production limit set in Specific Condition #25. The records shall be updated on a weekly basis, kept on site, and provided to Department personnel upon request. An annual total and each individual week's data shall be submitted in accordance with General Provision 7.

29. Pursuant to §19.503 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-24. Compliance shall be demonstrated through compliance with Specific Condition #27.

30. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-24 shall be conducted by a person trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.

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

SECTION V: COMPLIANCE PLAN AND SCHEDULE

West Fraser (South), Inc. - Huttig Mill is in compliance with the applicable regulations cited in the permit application. West Fraser (South), Inc. - Huttig Mill 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. 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.

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.

Acid Rain (Title IV)

7. Pursuant to §26.701 of Regulation #26 and 40 CFR 70.6(a)(4), the permittee is prohibited from causing any emissions which exceed any allowances that the source lawfully holds under Title IV of the Act or the regulations promulgated thereunder. No permit revision is required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. This permit establishes no limit on the number of allowances held by the permittee. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement of this permit or the Act. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Act.

Title VI Provisions

8. 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.

9. 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.

10. 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.

11. 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.

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

Permit Shield

13. 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 December 9, 1996.

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

B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated December 9, 1996.

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
Regulations for 111(d) designated facilities	Arkansas Regulation 19.8	Facility wide	This facility is not identified in the list of sources regulated by 111(d).
Regulations for the control of volatile organic compounds	Arkansas Regulation 19.10	Facility wide	This facility is not located in Pulaski County.
Standards of Performance for Storage Vessels for Petroleum and/ or Volatile Organic Liquids	40 CFR Part 60, Subparts K, Ka, and Kb	Facility wide	All storage tanks have capacities less than 19,815 gallons.
Accidental Release Program	40 CFR Part 68	Facility wide	This facility does not store flammable or toxic material above the specified de minimis thresholds.

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.

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 December 9, 1996.

Description	Category
One hundred vertical fixed roof tanks, each with a capacity less than 10,000 gallons and true vapor pressure less than 0.5 psia.	A3
Ash and sawdust piles and associated handling systems and activities.	A13
Chipping and debarking operations.	A13
Totally enclosed conveyors.	A13
Storage handling and handling equipment for bark and wood residues not subject to fugitive dispersion offsite.	A13
A 1,800 gallon above ground, vertical, fixed roof gasoline storage tank.	A13
Stenciling Process	A9
Filing Room	A13

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.

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.

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

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.

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.

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.

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.