ADEQ
OPERATING
AIR PERMIT

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

Permit #: 736-AOP-R3

IS ISSUED TO:

Georgia-Pacific Studmill and Plywood Plant
101 Plywood Mill Road Highway 82 East
Crossett, AR 71635
Ashley County
AFIN: 02-00005

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

June 21, 1999 and June 20, 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE:	Georgia-Pacific Studmill and Plywood Plant
AFIN:	02-00005
PERMIT NUMBER:	736-AOP-R3
FACILITY ADDRESS:	101 Plywood Mill Road Highway 82 East Crossett, AR 71635
COUNTY:	Ashley
CONTACT POSITION:	Robert S. Murphy
TELEPHONE NUMBER:	
REVIEWING ENGINEER:	Melisha Griffin
UTM North-South (Y):	Zone 15 [3667]
UTM East-West (X):	Zone 15 [597]

Georgia-Pacific Studmill and Plywood Plant
Permit #: 736-AOP-R3
AFIN #: 02-00005

SECTION II: INTRODUCTION

Georgia-Pacific Corporation owns and operates a plywood plant and studmill facility located at 101 Plywood Mill Road Highway 82 East near Crossett, Arkansas. In a letter dated June 19, 2000 and a letter dated September 27, 2000, the facility proposes the following modification:

1. The re-routing of glue-line hog material from SN-C12 to SN-C11. There will be no effect on emissions, this is simply moving from one source to a larger capacity source.

2. The replacement of cyclone SN-C12 with a high efficiency cyclone. This will result in a decrease in emissions.

3. The redirecting of the new chipper from the surge-bin to the new SN-C15 cyclone. The chipper output results in an addition of 58 dry tons per month and 82 wet tons per month to SN-C15. This results in an increase in particulate emissions of 0.13 tons per year. The old cyclone to be replaced is not a high efficiency cyclone. The new cyclone at SN-C15 is high efficiency and will overall reduce emissions.

4. Change the lumber drying narrative source description of SN-100, SN-101, and SN-102. Kiln SN-100 is referred to as high-temperature, and SN-101 is labeled as conventional. However, kiln SN-100 should be labeled as conventional, and kiln SN-101 should be labeled as high-temperature.

5. The removal of cyclone C-16 from the permit since it is no longer in operation.

6. The removal of cyclone C-6 from the permit. The facility plans to install a screw conveyor to transport the related material to a belt-driven mechanical system. Using this system, the material will be conveyed to the boiler.

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PROCESS DESCRIPTION

Crossett, Arkansas, Plywood Facility
Process Description

Georgia-Pacific's Crossett Plywood Facility receives logs for processing into plywood. This facility is divided into two plants, both of which produce plywood panels. The following discussion details the process flow in each plant.

The incoming logs are unloaded in the logyard debarking area. The log debarkers (SN-00l) remove the bark from the logs before the logs are sent to the cutoff saws. The bark is mechanically conveyed to the bark shredder where it is shredded before being conveyed to the fuel bin. The cutoff saws (SN-002) trim the raw debarked logs to the desired length. The logs are sent to either Plant 1 or Plant 2 for processing. The trimmed-off ends of the logs are sent to the lilypad chippers where they are chipped before being sent to the fuel bin for transfer to the boilers. The shaker screen, which is also located between the plants, receives chips from the core chippers, the roundup chippers, and the veneer chippers. Oversized chips are sent to the rechipper and then back to the shaker screen. The green chips are shipped off site via rail car or trucks and the throughs are pneumatically conveyed to the fuel bin via cyclone C18 (SN-C18). The sized logs proceed to the soaking vats for conditioning. After soaking in the vats, the logs are mechanically conveyed to the green end processes, which include the lathes and the veneer clippers. The Green veneer is then dried in the veneer dryers (SN-100). Dry veneer is transferred to the Gluelines where the plywood is laid up and glue is applied to the veneer. After glueing, the panels are pressed at the Presses. After pressing, the panels are finished by the skinnersaws, spec saws or sanders.

Plant 2

In Plant 2, the lathes peel the logs into thin pieces of green veneer, which are then clipped to the desired size by the veneer clippers. If the log core that remains after the veneer is peeled off is of high quality, it is shipped offsite. The lower quality log cores are chipped at the core chipper. The chips are then conveyed to the shaker screen. The veneer trimmings from the veneer clipper are chipped by the veneer chipper and also conveyed to the shaker screen (the process flow from the shaker screen was discussed in the preceding paragraph). If the clipped green veneer is of high quality, it proceeds directly to the veneer dryers (SN-100B). Lower quality veneer is cut into smaller strips by the green fishtail saws before being dried. Wood residuals from the green fishtail saw are sent to the veneer chipper. The higher quality veneer will form the faces of the plywood panel, while the smaller strips of veneer will form the core. The green fishtail saws are attached to a pneumatic system that conveys the sawdust that is generated to the fuel bin through two cyclones in series, C9 (SN-C9) and C3 (SN-C3). In the dryers, the veneer is dried using steam that is generated by the wood-fired boilers. The wood-fired boilers combust the wood residuals generated by both

Plants 1 and 2. The combustion exhaust from each boiler passes through a multiclone and a scrubber (SN-WB1 and SN-WB2) before being released to the atmosphere. In the dryers, the veneer is dried to a lower moisture content in the hot section before being cooled in the cooling section. The rough, wavy sheets will be sent to the dry core saw, which cuts the load in half to be used as core material. This saw is connected to a pneumatic system that conveys the sawdust that is generated to the fuel bin via two cyclones in series, C9 (SN-C9) and C3 (SN-C3). If the veneer has not been damaged, it proceeds to the glueline, SN-003. Glue is applied to the veneer before core strips are applied. Glue is applied again before the other sheet of veneer is placed on top of the core strips. This process is repeated until the desired thickness is achieved. Any wood residuals generated in the glueline are hogged in the dry residuals hog and pneumatically conveyed to the fuel bin via two cyclones in series, C9 (SN-C9) and C3 (SN-C3). The unpressed plywood panel then proceeds to the pre-presses and presses (SN-004). In the presses, the combination of heat and pressure that is applied to the panels cures the glue and forms the plywood panel. After the presses, the panels may be temporarily stored in the plywood storage area (SN-005) before being trimmed by the skinner saw, or proceed to the patch line, the specialty saw/sander, the 6-head sander for finishing prior to being shipped offsite. The wood residuals generated by the skinner saw are hogged by the skinner saw hog before being pneumatically conveyed to the fuel bin via two cyclones in series, C9 (SN-C9) and C3 (SN-C3). The 6-head sander is attached to a pneumatic system, and the sanderdust that is generated by the system is pneumatically transported to the two wood-fired boilers via two fabric filters in series, F24 (SN-F24) and F21 (SN-F21) and a closed loop relay cyclone, C7B (SN-C7B).

The specialty saw cuts the panels to product specification, which varies by demand. The specialty saw and sander are attached to a pneumatic system. Any sawdust that is generated by this machine is pneumatically conveyed to the fuel bin by three cyclones in series, C13 (SN-C 13), C9 (SN-C9), and C3 (SN-C3). Any sanderdust that is generated by this machine is pneumatically conveyed to the two wood-residuals boilers via two fabric filters in series, F22 (SN-F22) and F21 (SN-F21) and a closed loop relay cyclone, C7B (SN-C7B). Some of the panels may be sent to edge sealing, where they are stacked, and the ends of the stacks are spray painted and stenciled with the Georgia-Pacific logo. The plywood panels may then be shipped offsite.

Plant 1

The manufacture of plywood in Plant I uses similar equipment and manufacturing processes as Plant 2.

Plywood Production Line

The Plant 1 plywood production line utilizes two lathes to peel the logs into thin pieces of green veneer, which are then clipped to the desired size by the veneer clippers. If the log core that remains

after the veneer is peeled off is of high quality, it is shipped offsite. The lower quality logs are chipped at the core chipper. The chips are then conveyed to the shaker screen. The veneer trimmings from the veneer clipper are chipped by the veneer chipper and are also conveyed to the shaker screen (the process flow from the shaker screen was discussed previously). If the clipped green veneer is of high quality, it proceeds directly to the veneer dryers (SN-100A). Lower quality veneer is cut into smaller strips by the green fishtail saw, center cut saw, fishtail saw, or green cut back saw. The higher quality veneer will form the faces of the plywood panel, while the smaller strips of veneer will form the core. The green fishtail and the cut back saws are attached to a pneumatic system that conveys the sawdust that is generated to the fuel bin through two cyclones in series C11 (SN-C11) and CS (SN-C5). Green veneer sheets are picked up by a vacuum lift to assist the dryer tenders in feeding the veneer dryers. In the dryers (SN-100), the veneer is dried using steam that is generated by the wood-fired boilers (the emission points associated with the boilers were discussed earlier). The veneer is dried to a lower moisture content in the hot section of the dryers before being cooled in the cooling section. The rough, wavy sheets are sent to the dry core saw which cut the veneer in half to be used as core material. The dry core saw is connected to the pneumatic system that conveys the sawdust that is generated to the fuel bin via two cyclones in series, C12 (SN-C12) *[SN-C12 is replaced with a high efficiency Clone with this modification]* and C5 (SN-C5). If the veneer has not been damaged, it proceeds directly to the layup line and then to the glueline, SN-003. Glue is applied to the veneer before the core strips are applied. Glue is applied again before the other sheet of veneer is placed on top of the core strips. This process is repeated until the desired thickness is achieved. Any wood residuals generated in the glueline are hogged in the dry residuals hog and pneumatically conveyed to the fuel bin via two cyclones in series, C11 (SN-C11) and C5 (SN-C5). The unpressed plywood panel then proceeds to the pre-presses and presses (SN-004). In the presses, the combination of heat and pressure that is applied to the panels cures the glue and forms the plywood panel. After the presses, the panels may be temporarily stored in the plywood storage area (SN-005), or trimmed at the skinner saw, or proceed to the specialty saw/sander, the 4-head sander, or the dual patch line.

Sanderdust generated by the 8' specialty saw/sander is pneumatically conveyed to two fabric filters in series, F-10 (SN-F10) and F-21(SN-F21) or may be diverted to C5 (SN-C5). Sawdust generated by the 8' specialty saw/sander is pneumatically conveyed to two cyclones in series, C11 (SN-C11) and C5 (SN-C5).

The primary route for sanderdust generated by the 4-head sander and the specialty saw is pneumatic conveyance to the boiler fuel bins via two fabric filters in series, F-10 (SN-F10) and F21 (SN-F21). An alternate route for sanderdust generated by the 4-head sander and specialty saw is pneumatic conveyance to the fuel bin via fabric filter F-10 (SN-F10), through the C-11 cyclone blower, then to the cyclone C-5 (SN-C5), located on top of the fuel bin where the long belt conveys the woodwaste to the fuel house at the boiler.

Pressed panels are then sent to the skinner saw. The wood residuals generated by the skinner saw are pneumatically conveyed to the skinner saw hog and hogged before being pneumatically conveyed to the fuel house via a fabric filter and cyclone in series, F23 (SN-F23) and C20 (SN-C20).

The 10' specialty saw cuts the panels to product specification, which varies by demand. The 10' specialty saw/sander is attached to a pneumatic system. Any woodwaste that is generated by this machine is pneumatically conveyed to the fuel house by a fabric filter and cyclone in series, F23 (SN-F23) and C20
(SN-C20).

Sawdust generated by the cut-to-size saw is pneumatically conveyed by a dust-pickup attached to the main 40" inlet to F23 (SN-F23) baghouse and then to C20 (SN-C20).

Cyclones SN-C3, SN-C5, SN-C18 (Plywood plant) all empty into the fuel bin. The new source Bin-Vent Bagfilter SN-F25 will reduce fugitive dust and the high positive pressure in the fuel bin by drawing air from the inside and filtering it through 64 filter bags.

Some panels may go to the patch line for further processing prior to being run through the 4-head sander. Some of the panels may be sent to edge sealing, where they are stacked, and the ends of the stacks are spray painted and stenciled with the Georgia-Pacific logo. The plywood panels may then be shipped offsite.

Crossett, Arkansas Studmill Facility
Process Description

Cores from offsite sources are unloaded in the wood yard. Low quality cores are shipped offsite. The cores of higher quality proceed to the sawing and sizing process where both ends of the cores are trimmed to the desired length, and the cores are cut according to product specifications. Wood residuals and sawdust from this operation are mechanically conveyed to the chipper, which chips the wood residuals into smaller pieces. These pieces are then conveyed to a shaker screen. The throughs from the screen are shipped offsite while the fines mechanically conveyed to the boiler. The green lumber proceeds to either the conventional kiln (SN-100), the high temperature kiln (SN-101), or the conventional kiln (SN-102). The kilns, which are indirectly heated using steam generated from the boiler at the plywood facility, dry the wood to the desired moisture content. The roughcut dry lumber is planed before being sent to the retrim saw or the rip and chop saws, which trim the wood to customer specifications. The planer shavings generated by the planer are pneumatically conveyed to the dry residuals surge bin via cyclone C15 (SN-C15). The dry residuals in the surge bin are pneumatically conveyed to truck loading via cyclone C-25 (SN-C25) and then shipped offsite. Some lumber may be sent to edge sealing operations where the ends are spray painted and stenciled with the Georgia-Pacific logo. Studs may be stored prior to being shipped

offsite.

APPLICABLE REGULATIONS

Georgia-Pacific Studmill and Plywood Plant is subject to the provisions of 40 CFR 52.21 (Prevention of Significant Deterioration), the *Arkansas Air Pollution Control Code* (Regulation 18), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulations of the Arkansas Operating Air Permit Program* (Regulation 26).

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	122.9[1]	531.5	N/A
		PM_{10}	91.4[1]	390.3	
		SO_2	128.2	45.0	
		VOC	83.9[1]	555.6	
		CO	517.4	2266.2	
		NO_x	98.6	431.8	
		Pb	0.340	0.142	
		Phenols	14.02[1]	57.63	
		POM	0.02	0.06	
		Formaldehyde	2.69[1]	12.78	
			0.22	0.90	
		Benzene	0.044	0.194	
		Arsenic	0.002	0.010	
		Beryllium	0.006	0.028	
		Cadmium	0.36	1.62	
		Chlorine	0.02	0.04	
		Cobalt	0.42	1.84	
		Manganese	0.002	0.010	
		Mercury	0.08	0.12	
		Nickel	1.24[1]	6.04	
		Acetaldehyde	0.78[1]	3.22	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
		MEK	7.98	31.08	
		Methanol	1.19	4.59	
		Toluene	0.06	0.20	
		Acrolein	0.02	0.03	
		Xylene			
WB1	Wood Residuals Boiler #1	PM	19.0	83.3	20
		PM_{10}	19.0	83.3	
		SO_2	64.0	22.0	
		VOC	5.2	23.0	
		CO	250.0	1095.0	
		NO_x	45.0	197.1	
		Pb	0.17	0.071	
		Phenols	0.01	0.04	
		POM	0.01	0.03	
		Formaldehyd	0.16	0.69	
		e	0.09	0.37	
		Benzene	0.022	0.097	
		Arsenic	0.001	0.005	
		Beryllium	0.003	0.014	
		Cadmium	0.18	0.81	
		Chlorine	0.01	0.02	
		Cobalt	0.21	0.92	
		Manganese	0.001	0.005	
		Mercury	0.04	0.06	
		Nickel			
WB2	Wood Residuals Boiler #2	PM	19.0	83.3	25
		PM_{10}	19.0	83.3	
		SO_2	64.0	22.0	
		VOC	5.2	23.0	
		CO	250.0	1095.0	
		NO_x	45.0	197.1	
		Pb	0.17	0.071	
		Phenols	0.01	0.04	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
		POM	0.01	0.03	
		Formaldehyde	0.16	0.69	
			0.09	0.37	
		Benzene	0.022	0.097	
		Arsenic	0.001	0.005	
		Beryllium	0.003	0.014	
		Cadmium	0.18	0.81	
		Chlorine	0.01	0.02	
		Cobalt	0.21	0.92	
		Manganese	0.001	0.005	
		Mercury	0.04	0.06	
		Nickel			
F10	Sanding (4-head sander/specialty machine and sanding)	PM PM_{10}	3.7 3.7	16.0 16.0	30
F21	Relay Filter from SN-C7b	PM PM_{10}	0.4 0.4	1.5 1.5	30
F22	Single-Head Sander and Specialty Machine	PM PM_{10}	1.7 1.7	7.4 7.4	30
F24	6-Head Sander	PM PM_{10}	1.3 1.3	5.5 5.5	30
C3	Skinner Saw / Glueline Hog / Specialty Saw and Sander	PM PM_{10}	3.3 1.7	14.3 7.2	32
C5	Skinner Saw, Specialty Saw Kerf, and Glueline	PM PM_{10}	3.6 1.8	16.0 7.8	32
C9	Glueline, Skinner Saw/Specialty Saw Kerf	PM PM_{10}	9.7 4.9	42.0 21.0	32
C11	Skinner Saw, Glueline	PM	4.2	19.1	32

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
	Hog, Cutback Saw, and 8' Spec Saw Kerf	PM_{10}	2.2	9.6	
C12	Glueline Flying Saw, Core Saw & Plunger Saw	PM PM_{10}	5.2 2.6	23.0 11.3	32
C13	Specialty Machine	PM PM_{10}	3.1 1.6	13.5 6.8	32
C18	Shaker Screen	PM PM_{10}	1.6 0.8	7.0 3.5	32
C20	8' Skinner Saw/10' Specialty Saw and Sander	PM PM_{10}	0.4 0.4	1.7 1.7	32
F23	8' Skinner Saw/10' Specialty Saw and Sander	PM PM_{10}	1.7 1.7	7.4 7.4	32
F25	Fuel Bin Bagfilter	PM PM_{10}	0.4 0.4	1.5 1.5	32
03	Glueline	VOC Benzene Formaldehyde Methanol Toluene Xylene	0.4 0.01 0.01 0.30 0.04 0.01	1.4 0.02 0.02 1.10 0.15 0.02	35
04	Plywood Presses	PM PM_{10} VOC Acetaldehyde Benzene Formaldehyde MEK	3.0 3.0 19.0 0.65 0.01 0.54 0.33 5.00	12.0 12.0 76.0 2.60 0.04 2.17 1.32 20.0	35

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
		Methanol Phenols Toluene Xylene	14.00 0.31 0.01	55.95 1.24 0.01	
100A	Veneer Dryers #1, #2, #3, and #4	PM PM_{10} SO_2 VOC CO NO_x Acetaldehyde Acrolein Benzene Formaldehyde Methanol MEK Toluene	6.0 6.0 0.1 11.5 8.7 4.3 0.40 0.03 0.01 0.15 1.30 0.12 0.40	22.6 22.6 0.5 43.4 38.1 18.8 1.51 0.09 0.05 0.57 4.71 0.45 1.51	37
100B	Veneer Dryers #5, #6, #7, and #8	PM PM_{10} SO_2 VOC CO NO_x Acetaldehyde Acrolein Benzene Formaldehyde Methanol MEK Toluene	6.6 6.6 0.1 12.7 8.7 4.3 0.44 0.03 0.01 0.17 1.38 0.13 0.44	25.3 25.3 0.5 48.5 38.1 18.8 1.69 0.11 0.05 0.63 5.27 0.51 1.69	37

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
100C	Veneer Dryers Cooling Vents (23 Vents)	PM PM_{10} VOC Acetaldehyde Formaldehyde MEK	6.8 6.8 10.5 0.40 1.00 0.20	26.0 26.0 40.0 1.60 3.60 0.80	37
100D	Veneer Dryers Infeed Vents (7 Vents)	VOC	10.7	39.5	37
02	Cutoff Saws	PM PM_{10}	7.2 0.5	31.0 2.0	43
05	Storage Area after Presses	VOC Formaldehyde	8.7 0.50	38.0 2.17	44
C6	No Longer in Service				
C15	Planing and Hogging	PM PM_{10}	13.4 5.2	58.4 22.4	45
C16	No Longer In Service				
C25	Truck Loading	PM PM_{10}	1.4 0.1	6.1 0.4	45
100	Conventional Kiln[2]	PM PM_{10} VOC Formaldehyde Phenols Acetaldehyde MEK	3.8 3.8 654.0 6.54 4.65 3.62 0.37	0.3 0.3 40.0 0.40 0.29 0.22 0.03	47

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
101	High Temperature Kiln[2]	PM PM_{10} VOC Formaldehyde Phenols Acetaldehyde MEK	3.8 3.8 654.0 6.54 4.65 3.62 0.37	0.9 0.9 143.2 1.44 1.02 0.80 0.08	47
102	Conventional Kiln[2]	PM PM_{10} VOC Formaldehyde Phenols Acetaldehyde MEK	3.8 3.8 654.0 6.54 4.65 3.62 0.37	0.3 0.3 39.6 0.40 0.29 0.22 0.03	47
01	Haul Roads at Studmill[3]	PM PM_{10}	33.0 16.0	6.1 3.0	50

SECTION III: PERMIT HISTORY

Permit #157-A was issued to Georgia-Pacific Corporation, Crossett Division on June 28, 1973. This permit allowed for the installation of a 100 hp boiler. The facility was permitted to burn 5% natural gas, 5% #2 fuel oil, and 90% #6 fuel oil in this boiler.

On May 2, 1981, the United States Environmental Protection Agency issued permit PSD-AR-317 to Georgia-Pacific Corporation's existing wood processing plant located in Crossett, Arkansas. This permit allowed for the installation of two wood waste fired boilers. Emission limits for carbon monoxide (24 lb/hr) and oxides of nitrogen (26 lb/hr) were set.

On October 1, 1981, permit PSD-AR-317M-1 was issued. This permit allowed the facility to burn natural gas or #2 fuel oil in the two wood waste fired boilers during startup times and emergencies.

Permit #736-A was issued to Georgia-Pacific Corporation on July 26, 1984. This permit was issued to consolidate all active air permits for this facility and to increase the boiler emission limits set in the previous PSD permit. The emission limits set in this permit for the boilers were 250 lb/hr of carbon monoxide and 45 lb/hr of oxides of nitrogen.

Permit #736-AR-1 was issued to Georgia-Pacific Corporation on November 1, 1985. This permit allowed for the installation of a Globe sander/specialty machine, a pneumatic conveying system, and a fabric filter.

Permit #736-AR-2 was issued to Georgia-Pacific Corporation on March 2, 1988. This modified permit was issued to allow for the installation of a new sawline, a specialty machine, and wood waste hog. Also, an existing multiclone was replaced with a fabric filter.

Permit #736-AR-3 was issued to Georgia-Pacific Corporation, Mid-Continent Division, on February 23, 1990. This modified permit was issued to allow the emissions from the new dual inlet cyclone to be vented directly to the atmosphere instead of to an existing fabric filter.

Permit # 736-AR-4 was issued to Georgia-Pacific Corporation, Mid-Continent Division, on May 22, 1990. This modified permit allowed the facility to modify the plywood plant by installing a new planer shavings truck bin and high efficiency cyclone. The modification allowed the facility to sell planer shavings and end trim material generated at the planer mill.

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Permit #736-AOP-R0 was issued to Georgia-Pacific Studmill and Plywood Plant on June 21, 1999. Several changes from the previous permit (#736-AR-4) are being made in this Title V permit. These changes include, but are not limited to, the following: (1) Several previously unpermitted sources will now be permitted, (2) Annual emission rates will be included for every source, (3) Hourly emission rates for every source will now be listed in the permit, (4) Two regenerative thermal oxidizers will be permitted to control emissions from the veneer dryers, and (5) A new drying kiln will be permitted at the studmill.

Permit #736-AOP-R1 was issued on October 21, 1999. Georgia-Pacific replaced the #7 veneer dryer at its Plywood Plant #2. Although the new dryer was similar in size and design to the one it replaced, it had a slightly higher production rate. The higher production rate caused an increase in actual emissions from several sources at this facility. Below is a table of the net emission increases that occurred as a result of the modifications.

Pollutant	Net Emission Increase (tpy)	PSD Significant Emission Increase (tpy)
PM	9.03	25.0
PM_{10}	3.62	15.0
VOC	33.84	40.0
CO	141.33	100.0

Because the only source at which the carbon monoxide was increasing were the boilers which were not being modified, a BACT review was not required.

The results of the significance analysis are contained in the table below. As can be seen, the MSLs were not exceeded. Therefore, no ambient monitoring requirements need to be addressed nor does the full impact analysis need to be performed.

Pollutant	Averaging Period	Modeled Concentration ($\mu g/m^3$)	PSD Modeling Significance Level ($\mu g/m^3$)	PSD Monitoring DeMinimis Concentrations ($\mu g/m^3$)
CO	8-hour	46	500	575
	1-hour	138	2,000	------

Georgia-Pacific Studmill and Plywood Plant
Permit #: 736-AOP-R3
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Permit #736-AOP-R1 was administratively amended on December 20, 1999, to correct the emission rates for source SN-101 in the Total Allowable Emissions Table and the permitted throughputs for sources SN-100 and SN-101 to agree with information submitted to the Department on November 13, 1997.

Permit #736-AOP-R2 is the third operating permit issued to Georgia-Pacific Studmill and Plywood Plant under Regulation 26. Under this permit, the facility installed a new cut-to-size saw that discharges into an existing baghouse, a new baghouse on the existing fuel bin, and a new chipper that discharges directly into the surge bin. The facility also capped a cyclone so that it would no longer be considered an emission point. Permitted emissions of particulate matter increased by less than two tons per year.

SECTION IV: EMISSION UNIT INFORMATION

Georgia-Pacific Studmill and Plywood Plant
Permit #: 736-AOP-R3
AFIN #: 02-00005

SN-WB1
Wood Residual Boiler #1

Source Description

Wood residual boiler #1 was installed in 1981 under a PSD permit issued by the United States Environmental Protection Agency. At this time, the carbon monoxide and oxides of nitrogen emissions underwent a PSD review. This boiler is a 211.2 MMBTU/hr, wood waste fired unit. Wood residual boiler #1 provides steam to several sources throughout the plywood plant and the studmill. The wood waste fired in this boiler consists of bark, plywood sanderdust, plywood trim, log vat debris, and glueline residuals.

The permittee is allowed to burn natural gas or #2 fuel oil instead of wood waste during startup or emergency conditions. Previously, the permittee could only use these alternative fuels for a limited number of hours per year. In order to make record keeping requirements easier and more effective, the alternative fuel usage will be limited by gallons of fuel oil. The maximum allowable amount of fuel oil was calculated by multiplying the maximum amount of fuel oil that could be fired in one hour by the number of hours that the permittee was limited to in permit #736-AR-4. Although the permittee may still burn natural gas instead of wood waste, no limit has been set for this alternative fuel as emissions will be greater when the other permitted fuels are being fired in the boiler and the limits in previous permits did not specify separate limits for fuel oil and natural gas.

This boiler is not subject to any NSPS subpart. The boiler is less than 250 MM BTU/hr and is therefore exempt from 40 CFR Part 60, Subpart D. The boiler is exempt from 40 CFR Part 60, Subpart Db because of the date of installation. Due to boiler size and date of installation, the boiler is also exempt from 40 CFR Part 60, Subpart Dc.

Only hourly emission rates for particulate matter, carbon monoxide, and oxides of nitrogen were in previous permits. However, in this permit, the three other criteria pollutants as well as several hazardous air pollutants will also be quantified. Although the actual emissions from this boiler will be increasing due to increased steam demand due to the replacement of the #7 veneer dryer, the permitted emissions from this boiler will not be increasing.

Emissions from this boiler are controlled by a scrubber and a multiclone. Compliance with the emission rates will be shown through compliance with the fuel usage limits and Specific Conditions 7 and 10, and operation of the control equipment as outlined in the permit application. Annual testing is also required for particulate matter.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-WB1.

Pollutant	lb/hr	tpy
PM_{10}	19.0	83.3
SO_2	64.0	22.0
VOC	5.2	23.0
Pb	0.17	0.071

2. Pursuant to §19.501 et seq and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at source SN-WB1.

Pollutant	lb/hr	tpy
CO	250.0	1095.0
NO_x	45.0	197.1

3. 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 at source SN-WB1. The HAP emission rates listed below were based upon published emission factors available at the time of permit issuance. Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

Pollutant	lb/hr	tpy
PM	19.0	83.3
Phenols	0.01	0.04
POM	0.01	0.03
Formaldehyde	0.16	0.69
Benzene	0.09	0.37
Arsenic	0.022	0.097
Beryllium	0.001	0.005
Cadmium	0.003	0.014

Chlorine	0.18	0.81
Cobalt	0.01	0.02
Manganese	0.21	0.92
Mercury	0.001	0.005
Nickel	0.04	0.06

4. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-WB1 as measured by EPA Reference Method 9.

5. Pursuant to §19.703 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 permittee shall establish parametric monitoring ranges for liquid flow rate to the scrubber during the stack testing required by Specific Condition 9. The permittee shall be required to maintain the minimum flow rate to verify compliance with the opacity and the particulate matter limits.

6. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the liquid flow rate in order to demonstrate compliance with Specific Condition 5 and which may be used by the Department for enforcement purposes. The permittee shall record the liquid flow rate a minimum of once per hour. These records shall be kept on site and made available to Department personnel upon request. Monthly records shall be submitted to the Department in accordance with General Provision 7.

7. Pursuant to §19.703 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain the flue gas oxygen monitor in the flue of SN-WB1 to continuously monitor a representative sample of the flue gas. During each hour of operation of SN-WB1, oxygen readings shall be recorded at intervals of five minutes or less and shall be averaged to arrive at an hourly oxygen concentration for this boiler. Operation of this boiler with an average hourly flue gas oxygen concentration, as measured by the monitor, less than 4.0% or greater than 10.7% shall be considered a violation of this permit.

8. Pursuant to §19.705 and§19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the average hourly flue gas oxygen concentration. These records shall be kept on site and made available to Department personnel upon request. The permittee will be required to submit records pertaining to the flue gas oxygen concentration based on the Department's CEMS standards rather than General Provision 7. This will require submittals every three months rather than every six months.

9. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall

conduct annual testing for particulate matter using EPA Reference Method 5. These tests shall be conducted in accordance with Plantwide Condition #3.

10. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall only fire a wood/bark mixture in source SN-WB1 except as outlined in Specific Condition 13. The permittee may also fire a limited amount of used oil and oil absorbent material.

11. Pursuant to §19.705 and §19.901 et seq of Regulation 19, 40 CFR Part 52, Subpart E, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not fire in excess of 12,500 gallons of used oil at source SN-WB1 in any consecutive twelve month period.

12. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, the permittee shall maintain records of the amount of used oil fired at source SN-WB1 in order to demonstrate compliance with Specific Condition 11 and which may be used by the Department for enforcement purposes. These records shall be updated monthly, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

13. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall fire natural gas or #2 fuel oil only during startup or emergency conditions at SN-WB1.

14. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not fire in excess of 661,380 gallons of #2 fuel oil at SN-WB1 in any consecutive twelve month period.

15. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of #2 fuel oil fired at SN-WB1 in order to demonstrate compliance with Specific Condition 14 and which may be used by the Department for enforcement purposes. These records shall be updated monthly, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.

16. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall test

source SN-WB1 for carbon monoxide using EPA Reference Method 10. This test shall take place no later than December 18, 1999. This test was required by permit #736-AOP-R0. If this test has been performed since the issuance of Permit #736-AOP-R0 but prior to the issuance of Permit #736-AOP-R1, the permittee will not be required to perform this test again. The permittee shall operate the boiler within 10% of the rated capacity of the equipment. Failure to test within this range shall limit the permittee to operating within 10% above the tested rate.

17. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-204 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the sulfur content of the fuel oil burned during startup or emergency conditions at SN-WB1 shall not exceed 0.5% by weight.

18. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall either test each batch of fuel oil received for sulfur content using a Department approved method or obtain a manufacturer's certification of the sulfur content of the fuel oil in order to demonstrate compliance with Specific Condition 17. The permittee shall maintain the records of the sulfur content of the fuel oil on site and shall make these records available to Department personnel upon request.

Georgia-Pacific Studmill and Plywood Plant
Permit #: 736-AOP-R3
AFIN #: 02-00005

SN-WB2
Wood Residual Boiler #2

Source Description

Wood residual boiler #2 was installed in 1981 under a PSD permit issued by the United States Environmental Protection Agency. At this time, the carbon monoxide and oxides of nitrogen emissions underwent a PSD review. This boiler is a 211.2 MMBTU/hr, wood waste fired unit. Wood residual boiler #2 provides steam to several sources throughout the plywood plant and the studmill. The wood waste fired in this boiler consists of bark, plywood sanderdust, plywood trim, log vat debris, and glueline residuals.

The permittee is allowed to burn natural gas or #2 fuel oil instead of wood waste during startup or emergency conditions. Previously, the permittee could only use these alternative fuels for a limited number of hours per year. In order to make record keeping requirements easier and more effective, the alternative fuel usage will be limited by gallons of fuel oil. The maximum allowable amount of fuel oil was calculated by multiplying the maximum amount of fuel oil that could be fired in one hour by the number of hours that the permittee was limited to in permit #736-AR-4. Although the permittee may still burn natural gas instead of wood waste, no limit has been set for this alternative fuel as emissions will be greater when fuel oil is being fired in the boiler and the limits in previous permits did not specify separate limits for fuel oil and natural gas.

This boiler is not subject to any NSPS subpart. The boiler is less than 250 MM BTU/hr and is therefore exempt from 40 CFR Part 60, Subpart D. The boiler is exempt from 40 CFR Part 60, Subpart Db because of the date of installation. Due to boiler size and date of installation, the boiler is also exempt from 40 CFR Part 60, Subpart Dc.

Only hourly emission rates for particulate matter, carbon monoxide, and oxides of nitrogen were in previous permits. However, in this permit, the three other criteria pollutants as well as several hazardous air pollutants will also be quantified. Although the actual emissions from this boiler will be increasing due to increased steam demand due to the replacement of the #7 veneer dryer, the permitted emissions from this boiler will not be increasing.

Emissions from this source are controlled by a scrubber and a multiclone. Compliance with the emission rates will be demonstrated through compliance with the fuel usage limits and Specific Conditions 25 and 28, and operation of the control equipment as outlined in the permit application. Annual testing is also required for carbon monoxide.

Specific Conditions

19. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-WB2.

Pollutant	lb/hr	tpy
PM_{10}	19.0	83.3
SO_2	64.0	22.0
VOC	5.2	23.0
Pb	0.17	0.071

20. Pursuant to §19.501 et seq and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at source SN-WB2.

Pollutant	lb/hr	tpy
CO	250.0	1095.0
NO_x	45.0	197.1

21. 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 at source SN-WB2. The HAP emission rates listed below were based upon published emission factors available at the time of permit issuance. Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

Pollutant	lb/hr	tpy
PM	19.0	83.3
Phenols	0.01	0.04
POM	0.01	0.03
Formaldehyde	0.16	0.69
Benzene	0.09	0.37
Arsenic	0.022	0.097
Beryllium	0.001	0.005
Cadmium	0.003	0.014

Chlorine	0.18	0.81
Cobalt	0.01	0.02
Manganese	0.21	0.92
Mercury	0.001	0.005
Nickel	0.04	0.06

22. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-WB2 as measured by EPA Reference Method 9.

23. Pursuant to §19.703 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 permittee shall establish parametric monitoring ranges for liquid flow rate to the scrubber during the stack testing required by Specific Condition 27. The permittee shall be required to maintain the minimum flow rate to verify compliance with the opacity and the particulate matter limits.

24. Pursuant to §19.703 and §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the liquid flow rate in order to demonstrate compliance with Specific Condition 23 and which may be used by the Department for enforcement purposes. The permittee shall record the liquid flow rate a minimum of once per hour. These records shall be kept on site and made available to Department personnel upon request. Monthly records shall be submitted to the Department in accordance with General Provision 7.

25. Pursuant to §19.703 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain the flue gas oxygen monitor in the flue of SN-WB2 to continuously monitor a representative sample of the flue gas. During each hour of operation of SN-WB2, oxygen readings shall be recorded at intervals of five minutes or less and shall be averaged to arrive at an hourly oxygen concentration for this boiler. Operation of this boiler with an average hourly flue gas oxygen concentration, as measured by the monitor, less than 4.0% or greater than 10.7% shall be considered a violation of this permit.

26. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the average hourly flue gas oxygen concentration. These records shall be kept on site and made available to Department personnel upon request. The permittee will be required to submit records pertaining to the flue gas oxygen concentration based on the Department's CEMS standards rather than General Provision 7. This will require submittals every three months rather than every six months.

27. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing for particulate matter using EPA Reference Method 5. These tests shall be conducted in accordance with Plantwide #3.

28. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall only fire a wood/bark mixture in source SN-WB2 except as outlined in Specific Condition 31. The permittee may also fire a limited amount of used oil and oil absorbent material.

29. Pursuant to §19.705 and §19.901 et seq of Regulation 19, 40 CFR Part 52, Subpart E, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not fire in excess of 12,500 gallons of used oil at source SN-WB2 in any consecutive twelve month period.

30. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, the permittee shall maintain records of the amount of used oil fired at source SN-WB2 in order to demonstrate compliance with Specific Condition 29 and which may be used by the Department for enforcement purposes. These records shall be updated monthly, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

31. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall fire natural gas or #2 fuel oil only during startup or emergency conditions at source SN-WB2.

32. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not fire in excess of 661,380 gallons of #2 fuel oil in any consecutive twelve month period at source SN-WB2.

33. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of #2 fuel oil fired during startup or emergency conditions at source SN-WB2 in order to demonstrate compliance with Specific Condition 32 and which may be used by the Department for enforcement purposes. These records shall be updated monthly, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision #7.

34. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall test source SN-WB2 for carbon monoxide using EPA Reference Method 10. This test shall take place no later than December 18, 1999. This test was required by permit #736-AOP-R0. If this test has been performed since the issuance of Permit #736-AOP-R0 but prior to the issuance of Permit #736-AOP-R1, the permittee will not be required to perform this test again. The permittee shall operate the boiler within 10% of the rated capacity of the equipment. Failure to test within this range shall limit the permittee to operating within 10% above the tested rate.

35. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-204 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the sulfur content of the fuel oil burned during startup or emergency conditions at SN-WB2 shall not exceed 0.5% by weight.

36. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall either test each batch of fuel oil received for sulfur content using a Department approved method or obtain a manufacturer's certification of the sulfur content of the fuel oil in order to demonstrate compliance with Specific Condition 35. The permittee shall maintain the records of the sulfur content of the fuel oil on site and shall make these records available to Department personnel upon request.

SN-F10, SN-F21, SN-F22, & SN-F24
Sanderdust Collection System

Source Description

These four fabric filters are each part of the pneumatic conveying system located at Plywood Plants #1 and #2. These fabric filters are used to convey the finer wood particles (sanderdust) to the fuel bin for storage prior to being fired in the two wood waste boilers.

These sources are permitted to operate at capacity for 8,760 hours per year. Therefore, no production records are required to be kept.

Specific Conditions

37. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/hr	tpy
F10	PM_{10}	3.7	16.0
F21	PM_{10}	0.4	1.5
F22	PM_{10}	1.7	7.4
F24	PM_{10}	1.3	5.5

38. 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 at the designated sources.

SN-#	Pollutant	lb/hr	tpy
F10	PM	3.7	16.0
F21	PM	0.4	1.5
F22	PM	1.7	7.4

SN-#	Pollutant	lb/hr	tpy
F24	PM	1.3	5.5

39. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from sources SN-F10, SN-F21, SN-F22, and SN-F24 as measured by EPA Reference Method 9.

40. Pursuant to§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct weekly observations of the opacity from sources SN-F10, SN-F21, SN-F22, and SN-F24 and keep a record of these observations. If visible emissions are detected, the permittee shall immediately take action to identify and correct the cause of the visible emissions. After the corrective action has been implemented, the permittee shall document that no visible emissions are present from the source in question. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. These records shall be kept on site and made available to Department personnel upon request.

Georgia-Pacific Studmill and Plywood Plant
Permit #: 736-AOP-R3
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SN-C3, SN-C5, SN-C9, SN-C11, SN-C12, SN-C13, SN-C18, SN-C20, SN-F23, & SN-F25
Residuals Collection System

Source Description

These eight cyclones and two fabric filters are part of the pneumatic conveying system located at the plywood plant. One fabric filter (SN-F23) is used to convey the finer wood particles (sanderdust) to the fuel bin. Source SN-F23 also controls the emissions generated by a cut-to-size saw installed under this permit. The new fabric filter (SN-F25) controls emissions from the existing fuel bin. The eight cyclones are used mainly to convey the larger wood particles (sawdust) to the fuel bin.

These sources are permitted to operate at capacity for 8,760 hours per year. Therefore, no throughput records are required to be kept for these sources.

Specific Conditions

41. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/hr	tpy
C3	PM_{10}	1.7	7.2
C5	PM_{10}	1.8	7.8
C9	PM_{10}	4.9	21.0
C11	PM_{10}	2.2	9.6
C12	PM_{10}	2.6	11.3
C13	PM_{10}	1.6	6.8
C18	PM_{10}	0.8	3.5
C20	PM_{10}	0.4	1.7
F23	PM_{10}	1.7	7.4
F25	PM_{10}	0.4	1.5

42. 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 at the designated sources.

SN-#	Pollutant	lb/hr	tpy
C3	PM	3.3	14.3
C5	PM	3.6	16.0
C9	PM	9.7	42.0
C11	PM	4.4	19.1
C12	PM	5.2	23.0
C13	PM	3.1	13.5
C18	PM	1.6	7.0
C20	PM	0.4	1.7
F23	PM	1.7	7.4
F25	PM	0.4	1.5

43. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from sources SN-C3, SN-C5, SN-C11, SN-C12, SN-C13, SN-C18, and SN-C9 as measured by EPA Reference Method 9.

44. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from sources SN-C20, SN-F25, and SN-F23 as measured by EPA Reference Method 9.

45. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct weekly observations of the opacity from sources SN-C20, SN-F25, and SN-F23 and keep a record of these observations. If visible emissions are detected, the permittee shall immediately take action to identify and correct the cause of the visible emissions. After the corrective action has been implemented, the permittee shall document that no visible emissions are present from the source in question. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken.

These records shall be kept on site and made available to Department personnel upon request.

46. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from sources SN-C3, SN-C5, SN-C11, SN-C12, SN-C13, SN-C18, and SN-C9 shall be conducted by personnel familiar with the permittee's visible emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9 after training is held in April 1999. 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.

SN-03 and SN-04
Plywood Production

Source Description

The glueline at this facility has been designated as source SN-03. The glue is applied to the veneer before and after the core strips are added to the veneer.

The plywood presses have been designated as source SN-04. The presses apply a combination of heat and pressure to the panels to cure the glue and form the plywood panel.

Compliance with these emission rates will be shown by compliance with Specific Conditions 49 and 51. Testing is required for volatile organic compounds and formaldehyde.

Specific Conditions

47. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/hr	tpy
03	VOC	0.4	1.4
04	PM_{10} VOC	3.0 19.0	12.0 76.0

48. 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 at the designated sources. The HAP emission rates listed below were based upon published emission factors available at the time of permit issuance. Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

SN-#	Pollutant	lb/hr	tpy
03	Benzene Formaldehyde Methanol	0.01 0.01 0.30	0.02 0.02 1.10

SN-#	Pollutant	lb/hr	tpy
	Toluene	0.04	0.15
	Xylene	0.01	0.02
04	PM	3.0	12.0
	Acetaldehdye	0.65	2.60
	Benzene	0.01	0.05
	Formaldehyde	0.54	2.17
	MEK	0.33	1.32
	Methanol	5.00	20.00
	Phenols	14.00	55.95
	Toluene	0.31	1.24
	Xylene	0.01	0.01

49. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-204 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, throughput of plywood shall not exceed 799,349 Msf on a 3/8" basis in any consecutive twelve month period at source SN-04.

50. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the plywood throughput at source SN-04 in order to demonstrate compliance with Specific Condition 49. These records shall be updated no later than the tenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7.

51. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-204 as referenced by §8-4-304 and §8-4-311, formaldehyde content of the glue used at source SN-03 shall not exceed 0.1% by weight. Compliance with this condition shall be verified by maintaining the appropriate MSDS sheet on site and providing it to Department personnel upon request.

Georgia-Pacific Studmill and Plywood Plant
Permit #: 736-AOP-R3
AFIN #: 02-00005

SN-100A, SN-100B, SN-100C, & SN-100D
Veneer Dryers

Source Description

On July 16, 1996, a Consent Decree (Civil Action No. 1 96-CV-1818) between the United States of America acting on behalf of the United States Environmental Protection Agency and Georgia-Pacific Corporation was executed. In accordance with this decree, Georgia-Pacific submitted a permit application to install two new regenerative thermal oxidizers on the veneer dryers to control emissions of volatile organic compounds.

This consent decree required that the permittee install one or more regenerative thermal oxidizers or some other type of control equipment to be approved by the EPA. Georgia-Pacific has chosen to install two thermal oxidizers to control the emissions of volatile organic compounds.

Source SN-100A is the regenerative thermal oxidizer controlling the emissions produced by the four veneer dryers located at Plant #1. Source SN-100B is the regenerative thermal oxidizer controlling the emissions produced by the four veneer dryers located at Plant #2. The hourly rates for both of these sources are based upon the maximum capacity of the equipment.

Under permit #736-AOP-R1, Georgia-Pacific is replacing the #7 veneer dryer. Although the new dryer is very similiar to the one it is replacing, the new dryer will have a slightly higher production capacity. Therefore, permitted hourly and annual emissions of particulate matter and volatile organic compounds will be increasing slightly.

Source SN-100C accounts for the emissions emitted at the veneer dryers cooling vents. Source SN-100D accounts for the emissions emitted at the veneer dryer infeed vents. No infeed vent will be associated with the new veneer dryer. Therefore, permitted emissions from source SN-100D will be decreasing.

Specific Conditions

1. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The hourly emission rates were based upon the maximum capacity of the equipment. Compliance with these emission rates will be demonstrated through compliance with the required testing and parametric monitoring program.

SN-#	Pollutant	lb/hr	tpy
100A	PM_{10}	6.0	22.6
	SO_2	0.1	0.5
	VOC	11.5	43.4
	CO	8.7	38.1
	NO_x	4.3	18.8
100B	PM_{10}	6.6	25.3
	SO_2	0.1	0.5
	VOC	12.7	48.5
	CO	8.7	38.1
	NO_x	4.3	18.8
100C	PM_{10}	6.8	26.0
	VOC	10.5	40.0
100D	VOC	10.7	39.5

2. 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 at the designated sources. The hourly emission rates were based upon the maximum capacity of the equipment. Compliance with these emission rates will be demonstrated through compliance with parametric monitoring program for the VOC emissions at this source. The HAP emission rates listed below were based upon published emission factors available at the time of permit issuance. Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

SN-#	Pollutant	lb/hr	tpy
100A	PM	6.0	22.6

SN-#	Pollutant	lb/hr	tpy
	Acetaldehyde	0.40	1.51
	Acrolein	0.03	0.09
	Benzene	0.01	0.05
	Formaldehyde	0.15	0.57
	Methanol	1.30	4.71
	MEK	0.12	0.45
	Toluene	0.40	1.51
100B	PM	6.6	25.3
	Acetaldehyde	0.44	1.69
	Acrolein	0.03	0.11
	Benzene	0.01	0.05
	Formaldehyde	0.17	0.63
	Methanol	1.38	5.27
	MEK	0.13	0.51
	Toluene	0.44	1.69
100C	PM	6.8	26.0
	Acetaldehyde	0.40	1.75
	Formaldehyde	1.00	3.60
	MEK	0.20	0.88

3. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity at sources SN-100A and SN-100B as measured by EPA Reference Method 9.

4. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, weekly observations of the opacity from sources SN-100A and SN-100B shall be conducted by personnel familar with the permittee's visible emissions. The permittee shall accept such observations as demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9 after training is held in April 1999. 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.

5. Pursuant to Civil Action No. 1 96-CV-1818, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-3114, and 40 CFR 70.6, the permittee shall operate the regenerative thermal oxidizers in such a manner as to capture all VOC emissions from the "hot zone" stacks of the veneer dryers.

6. Pursuant to Civil Action No. 1 96-CV-1818, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-3114, and 40 CFR 70.6, the permittee shall achieve a minimum 90% destruction efficiency for the captured VOC emissions except as described in Specific Condition 58.

7. Pursuant to Civil Action No. 1 96-CV-1818, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-3114, and 40 CFR 70.6, the permittee need not maintain the required 90% destruction efficiency during periods when the dryers are not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts), and Force Majeure events (including malfunctions which qualify as Force Majeure events). These startup and shutdown periods shall not exceed the minimum amount of time necessary for these events. During these events, the permittee shall minimize emissions to the greatest extent practicable.

8. Pursuant to Civil Action No. 1 96-CV-1818, §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall, at the beginning of every month, record its maintenance schedule for that month. To the greatest practical extent, the permittee shall schedule startup and shutdown of control technology systems during times when process equipment is also shutdown for routine maintenance.

9. Pursuant to Civil Action No. 1 96-CV-1818, §19.705 of Regulation 19, A.C.A. §8-4-203 as

referenced by §8-4-304 and §8-4-3114, and 40 CFR 70.6, the permittee shall complete shake-down and debugging and commence full time operation of the two regenerative thermal oxidizers no later than September 18, 1998.

10. Pursuant to Civil Action No. 1 96-CV-1818, §19.702 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall test sources SN-100A and SN-100B for VOC destruction efficiency no later than January 18, 1999, and every two years thereafter. The tests shall be conducted in accordance with Plantwide Condition 3 and in accordance with the testing protocol set forth in the Consent Decree. The results of the test shall be submitted to both the Department and the US EPA within thirty days of the test taking place.

11. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 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 permittee shall conduct a parametric monitoring program study, to commence no later than December 31, 1998, and to last no longer than 180 days, to establish the parameters needed to be controlled and monitored as well as the appropriate operating criteria to be maintained for each such parameter in order to ensure proper operation of the control technology system. This study shall establish for the affected units an appropriate relationship between two or more operational parameters and the required destruction efficiency in Specific Condition 57. The permittee shall include in the study the proposed process parameters to be monitored and the appropriate operating criteria. The permittee may use data gathered in studies for other facilities affected by the Consent Decree as approved by the EPA.

12. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall submit the results of the study required by Specific Condition 62 to the US EPA and to the Department for review and approval no later than six months from the date of the initial compliance testing required by Specific Condition 61.

13. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall have the necessary data recording equipment to implement the parametric monitoring program installed and operating or have established manual data record keeping procedures within 180 days of receiving the US EPA's approval of the parametric monitoring program.
14. Pursuant to Civil Action No. 1 96-CV-1818, §19.303 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall operate the regenerative thermal oxidizers and all parametric monitoring equipment within manufacturer's specifications.

15. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 of Regulation 19, A.C.A. §8-4-203 as

referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall begin monitoring and recording the parameters required by the parametric monitoring program within 180 days of receiving approval of the program from the US EPA.

16. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall monitor and record each parameter at least once every 15 minutes and shall average the readings over a 12-hour period.

17. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall provide the US EPA and the Department with a summary of the parametric monitoring data in order to demonstrate compliance and which may be used for enforcement purposes. These records shall be updated daily, shall be kept on site, and shall be made available to Department personnel upon request.

18. Pursuant to Civil Action No. 1 96-CV-1818, §19.703 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall calibrate or reevaluate the parametric monitoring devices based on the compliance demonstration tests required by Specific Condition 61. The permittee shall provide the US EPA and the Department with an annual report documenting its calibration or review of the parameters and proposed changes if necessary.

19. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-204 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall only use natural gas to fire the burners associated with the regenerative thermal oxidizers.

SN-02
Cutoff Saws

Source Description

These saws cut the debarked logs to the desired length. Emissions for this source were calculated based upon the throughput and emission factors. The emission factor was based upon mass balance, SCC emission factors, and facility experience with representative similar sources.

The hourly and the annual rates are based upon the maximum capacity of the equipment.

Specific Conditions

20. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-02.

Pollutant	lb/hr	tpy
PM_{10}	0.5	2.0

21. 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 at source SN-02.

Pollutant	lb/hr	tpy
PM	7.2	31.0

SN-05
Storage Area after Presses

Source Description

Plywood panels are stored prior to being shipped out to customers or transferred to another area for further processing. Emissions consist of volatile organic compounds from the glue used earlier in the process. Compliance with these emission rates will be shown by compliance with the plywood production limit set for the plywood presses.

Specific Conditions

22. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-05.

Pollutant	lb/hr	tpy
VOC	8.7	38.0

23. 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 at SN-05. The HAP emission rates listed below were based upon published emission factors available at the time of permit issuance. Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

Pollutant	lb/hr	tpy
Formaldehyde	0.50	2.17

SN-C15 & SN-C25
Wood Residuals Collection System

Source Description

These two cyclones are part of the pneumatic conveying system located at the studmill plant. The wood residuals are transported by a screw conveyor to a belt driven mechanical system. Using this system, the material is conveyed to the boiler. Sources SN-C15 convey wood residuals to the dry residuals surge bin. Source SN-C25 conveys the wood residuals stored in the dry residuals surge bin to the truck loading station.

Under the previous permit, the facility installed a new chipper. It is located adjacent to and discharges directly into the surge bin.

Specific Conditions

24. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/hr	tpy
C15	PM_{10}	5.2	22.4
C25	PM_{10}	0.1	0.4

25. 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 at the designated sources.

SN-#	Pollutant	lb/hr	tpy
C15	PM	13.4	58.4
C25	PM	1.4	6.1

26. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from sources SN-C15 and SN-C25 as measured by EPA Reference Method 9.

27. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from sources SN-C15 and SN-C25 shall be conducted by personnel familiar with the permittee's visible emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9 after training is held in April 1999. 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.

SN-100, SN-101, and SN-102
Lumber Drying

Source Description

The conventional drying kiln has been designated as source SN-100 while the high temperature drying kiln has been designated as source SN-101. Due to the variability in emissions throughout one charge, no hourly emission rates have been assigned to the kilns. Instead, a lb/charge limit has been assigned. It is expected that an average charge will take approximately 72 hours in the conventional kiln (SN-100) and 20 hours in the high temperature kiln (SN-101). Compliance with the annual emission rates set forth in this section will be demonstrated through the limits and recordkeeping requirements set forth in Specific Conditions 81 and 83. Compliance with the lb/charge rates are based upon the maximum capacity of the kilns.

In mid-1998, the permittee reconstructed a kiln already on site so that it could be used once again. This is a conventional kiln, designated as source SN-102, which will take approximately 72 hours to dry a charge to the desired moisture content. Compliance with the annual emission rates for this kiln will be demonstrated through compliance with Specific Condition 85. Compliance with the lb/charge rates are based upon the maximum capacity of the kilns.

Specific Conditions

28. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/charge	tpy
100	PM_{10} VOC	3.8 654.0	0.3 40.0
101	PM_{10} VOC	3.8 654.0	0.9 143.2
102	PM_{10} VOC	3.8 654.0	0.3 39.6

29. 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 at the designated sources. The HAP emission rates listed below were based upon published emission factors available at the time of permit issuance. Any changes in these emission factors will not constitute a violation of the HAP emission rates listed below.

SN-#	Pollutant	lb/charge	tpy
100	PM	3.8	0.3
	Formaldehyde	6.54	0.40
	Phenols	4.65	0.29
	Acetaldehyde	3.62	0.22
	MEK	0.37	0.03
101	PM	3.8	0.9
	Formaldehyde	6.54	1.44
	Phenols	4.65	1.02
	Acetaldehyde	3.62	0.80
	MEK	0.37	0.08
102	PM	3.8	0.3
	Formaldehyde	6.54	0.40
	Phenols	4.65	0.29
	Acetaldehyde	3.62	0.22
	MEK	0.37	0.03

30. 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 dry more than 20.816 million board feet of lumber at source SN-100 in any consecutive twelve month period.

31. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of lumber in board feet dried at source SN-100 in order to demonstrate compliance with Specific Condition 81 and which may be used by the Department for enforcement purposes. These records shall be updated monthly, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

32. 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 dry more than 75.35 million board feet of lumber at source SN-101 in any consecutive twelve month period.

33. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of lumber in board feet dried at source SN-101 in order to demonstrate compliance with Specific Condition 83 and which may be used by the Department for enforcement purposes. These records shall be updated monthly, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

34. Pursuant to §19.705 and §19.901 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not dry in excess of 20.816 million board feet of lumber at source SN-102 in any consecutive twelve month period. (Note: Although the addition of this kiln did not require a PSD review, the limits are listed as pursuant to the PSD regulations because an exceedance of these limits could indicate a violation of the PSD regulations.)

35. Pursuant to §19.702 and §19.901 et seq of Regulation 19 and 40 CFR 52.21, the permittee shall maintain records of the amount of lumber in board feet dried at source SN-102 in order to demonstrate compliance with Specific Condition 85 and which may be used by the Department for enforcement purposes. These records shall be updated monthly, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

SN-01
Haul Roads at Studmill

Source Description

Emissions from the haul roads are reduced by watering the roads as necessary. Due to the intermittent use of the haul roads, it was determined that a lb/hr particulate matter emission rate would not be suitable for this source. Instead, a lb/day limit has been set.

Specific Conditions

36. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-01. Compliance with these emission rates will be demonstrated through compliance with Specific Condition 107.

Pollutant	lb/day	tpy
PM_{10}	16.0	3.0

37. 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 at source SN-01.

Pollutant	lb/day	tpy
PM	33.0	6.1

38. 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 water all unpaved haul roads as necessary in order to reduce fugitive emissions.

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Georgia-Pacific Studmill and Plywood Plant is in compliance with the applicable regulations cited in the permit application. Georgia-Pacific Studmill and Plywood Plant 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. 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.

SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated January 10, 1997.

-- Tanner Gas Storage Tank - 55 gallon drum

-- Used Oil Storage Tank - 55 gallon drum

-- Air Tool Oil Storage Tank - 110 gallon above ground storage tank

-- Chipper

-- Block Hog

-- Log Debarking

-- Bark Shredder

-- Plant #1 10' Length Saw

-- Lilypad Chipper

-- Layup Line

-- Diesel Storage Tank - 8,000 gallons

-- Gasoline Storage Tank - 1,000 gallons

-- Hydraulic Oil Storage Tank - 10,000 gallons

-- Panel Oil Tank - 7,180 gallons

-- 10 Hydraulic Oil Tanks - 500 gallons each

-- 2 Resins Tanks - 18,800 gallons

-- 2 Resins Tanks - 1,500 gallons

Pursuant to §26.304 of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

1. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.

2. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.

3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

4. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.

5. Consumer use of office equipment and products, not including commercial printers or business primarily involved in photographic reproduction.

6. Janitorial services and consumer use of janitorial products.

7. Internal combustion engines used for landscaping purposes.

8. Laundry activities, except for dry-cleaning and steam boilers.

9. Bathroom/toilet emissions.

10. Emergency (backup) electrical generators at residential locations.

11. Tobacco smoking rooms and areas.

12. Blacksmith forges.

13. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.

14. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.[1]

15. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface-coating or products.

16. Portable electrical generators that can be "moved by hand" from one location to another.[2]

17. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.

18. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.[3]

19. Air compressors and pneumatically operated equipment, including hand tools.

20. Batteries and battery charging stations, except at battery manufacturing plants.

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[1] Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

[2] "Moved by hand" means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

[3] Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

21. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.[4]

22. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and no volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
23. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.

24. Drop hammers or presses for forging or metalworking.

25. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.

26. Vents from continuous emissions monitors and other analyzers.

27. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

28. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.

29. Lasers used only on metals and other materials which do not emit HAPs in the process.

30. Consumer use of paper trimmers/binders.

31. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.

32. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.

33. Laser trimmers using dust collection to prevent fugitive emissions.

34. Bench-scale laboratory equipment used for physical or chemical analysis not including lab

[4] Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

fume hoods or vents.

35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.

36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.

37. Hydraulic and hydrostatic testing equipment.

38. Environmental chambers not using hazardous air pollutant gases.

39. Shock chambers, humidity chambers, and solar simulators.

40. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.

41. Process water filtration systems and demineralizers.

42. Demineralized water tanks and demineralizer vents.

43. Boiler water treatment operations, not including cooling towers.

44. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.

45. Oxygen scavenging (de-aeration) of water.

46. Ozone generators.

47. Fire suppression systems.

48. Emergency road flares.

49. Steam vents and safety relief valves.

50. Steam leaks.

51. Steam cleaning operations.

52. Steam and microwave sterilizers.

53. Site assessment work to characterize waste disposal or remediation sites.

54. Miscellaneous additions or upgrades of instrumentation.

55. Emissions from combustion controllers or combustion shutoff devices but not combustion units itself.

56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).
57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.

58. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.

59. Residential wood heaters, cookstoves, or fireplaces.

60. Barbecue equipment or outdoor fireplaces used in connection with any residence or recreation.

61. Log wetting areas and log flumes.

62. Periodic use of pressurized air for cleanup.

63. Solid waste dumpsters.

64. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.

65. Natural gas odoring activities unless the Department determines that emissions constitute air pollution.

66. Emissions from engine crankcase vents.

67. Storage tanks used for the temporary containment of materials resulting from an emergency reporting of an unanticipated release.

68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding

compounds where all materials charged are in paste form.

69. Mixers, blenders, roll mills, or calenders for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.

70. The storage , handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to the equipment only).

71. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.

72. Tall oil soap storage, skimming, and loading.

73. Water heaters used strictly for domestic (non-process) purposes.

74. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.

75. Agricultural operations, including onsite grain storage, not including IC engines or grain elevators.

76. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.

2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.

3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.

4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.

5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:

    a. The date, place as defined in this permit, and time of sampling or measurements;
    b. The date(s) analyses were performed;
    c. The company or entity that performed the analyses;
    d. The analytical techniques or methods used;

e. The results of such analyses; and
f. The operating conditions existing at the time of sampling or measurement.

6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

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

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §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 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 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A.§8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.

10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.

14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.

15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.

16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.

17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.

18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.

20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:

    a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
    d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.

21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:

    a. The identification of each term or condition of the permit that is the basis of the certification;
    b. The compliance status;
    c. Whether compliance was continuous or intermittent;
    d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
    e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.

22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:

    a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;

b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

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

APPENDIX A

Report/Plan
Parametric Monitoring System
CAA Section 114 Consent Decree
Georgia-Pacific Corporation
Crossett, Arkansas Plywood Facility

APPENDIX B

APPENDIX C

APPENDIX D