

# ADEQ

ARKANSAS  
Department of Environmental Quality

**AUG 31 2010**

Kelly Olivier, EHS Coordinator  
Anthony Forest Products Company  
P.O. Box 724  
Strong, AR 71765

Dear Mr. Olivier:

The enclosed Permit No. 1681-AOP-R10 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 6/14/2010.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 1681-AOP-R10 for the construction, operation and maintenance of an air pollution control system for Anthony Forest Products Company to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates  
Chief, Air Division

## **RESPONSE TO COMMENTS**

**Anthony Forest Products Company**

**Permit No.: 1681-AOP-R10**

**AFIN: 70-00473**

On July 16, 2010 the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, the facility submitted written comments, data, views, or arguments on the draft permitting decision. The Department's response to these issues is as follows:

Comment #1

The plant wide condition for the permit shield at the last of the PWCs is indicated as #2 while it should be #12.

Response to Comment #1

The typographical error has been corrected.

# ADEQ OPERATING AIR PERMIT

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

Permit No. : 1681-AOP-R10

IS ISSUED TO:

Anthony Forest Products Company  
1236 Urbana Road  
El Dorado, AR 71768  
Union County  
AFIN: 70-00473

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:

November 3, 2008 AND November 2, 2013

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

Signed:

  
\_\_\_\_\_  
Mike Bates  
Chief, Air Division

AUG 31 2010  
\_\_\_\_\_  
Date

Anthony Forest Products Company  
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40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units*

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#### List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO <sub>2</sub>	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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**SECTION I: FACILITY INFORMATION**

PERMITTEE: Anthony Forest Products Company

AFIN: 70-00473

PERMIT NUMBER: 1681-AOP-R10

FACILITY ADDRESS: 1236 Urbana Road  
El Dorado, AR 71768

MAILING ADDRESS: P.O. Box 724  
Strong, AR 71765

COUNTY: Union County

CONTACT NAME: Kelly Olivier

CONTACT POSITION: EHS Coordinator

TELEPHONE NUMBER: 870-962-3206

REVIEWING ENGINEER: Charles Hurt, P.E.

UTM North South (Y): Zone 15: 3669126.84 m

UTM East West (X): Zone 15: 551893.98 m

## **SECTION II: INTRODUCTION**

### **Summary of Permit Activity**

Anthony Forest Products Company (AFIN: 70-00473) operates a sawmill and ancillary operations in Urbana, Arkansas. Anthony submitted an application to replace two existing planer cyclones (SN-03 and SN-04) with a higher capacity cyclone in series with a baghouse (SN-21). Permitted PM and PM<sub>10</sub> limits decreased by 29.8 tpy and 11.9 tpy, respectively.

### **Process Description**

Logs are taken by truck to the Sawmill (SN-06) where they are debarked and sawed into cants or rough lumber. The lumber is then edged and trimmed. Trimmings and edgings are routed to a chipper. Chips are pneumatically conveyed to shake screens where blocks and fines are removed. The chips are then belt conveyed to a chip bin and eventually loaded into tractor trailers. Bark and sawdust are conveyed to the boiler fuel storage. Excess material is routed to loading stations loaded into tractor trailers, and transported off site for use as fuel.

Blocks are routed back to the chipper. Chipper fines are routed to boiler fuel storage or to a trailer loader for shipment off-site. The blower, which conveys the materials to the shaker screen, has an associated cyclone, which vents inside the sawmill building.

From the Sawmill, the lumber is stored and stacked. The lumber is then dried in kilns (Dry Kilns #2 and #3). The dry kilns are heated by steam generated in wood burning boilers.

Water vapor, volatile organic compounds (VOCs), and hazardous air pollutants (HAPs) are evaporated from the wood in the lumber drying process. Dry Kiln #2 is designated as SN-02; and Dry Kiln #3 is designated as SN-14. These kilns are steam heated, exhausting only water vapor, VOC, and HAPs evaporated from the wood.

The wood-fuel boilers burn southern pine sawdust, bark, and other wood residue, including shavings. The boiler stacks (designated as SN-12, SN-13, and SN-16) exhaust products of combustion.

Dried lumber is stored in protected areas before planing. The dried lumber is planed in the planer mill prior to shipping. Two planers, a hammer hog, a trimmer, a rip saw, and a re-saw are located in the Planer Mill. This equipment vents to a cyclone which collects material (primarily shavings and sawdust). The cyclone has three duct inlets: one from planer #1, one from planer #2, and one from the baghouse dust relay system. The outlet of the cyclone vents to a baghouse (SN-21). Shavings and sawdust from the cyclones are dropped into a woodwaste storage bin (insignificant activity) where it is then loaded onto a truck and shipped off-site or, as needed, transferred through a closed pipe to the green wood fuel silo to be burned as fuel in the wood fuel boilers.

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### Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective January 25, 2009
40 CFR Part 60, Subpart Dc – <i>Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units</i>
40 CFR Part 63, Subpart DDDD – <i>National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*</i>

\* The facility is subject to the subpart. Other than initial notification, there are no applicable requirements of the subpart.

### Emission Summary

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

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	38.8	168.6
		PM <sub>10</sub>	16.4	71.1
		SO <sub>2</sub>	1.5	6.6
		VOC	70.6	244.4
		CO	45.0	197.1
		NO <sub>x</sub>	25.6	112.3
Total Allowable Non-Criteria Pollutant Emissions (included in VOC totals unless noted otherwise)		Acetaldehyde	0.77	2.64
		Acrolein	0.73	2.21
		Benzene	0.60	1.80
		Cadmium	2.02E-03	8.84E-03
		Chromium	1.86E-03	8.15E-03
		Formaldehyde	1.00	2.90
		HCl <sup>c</sup>	1.26	5.46
		Lead	2.29E-03	0.01
		Manganese	0.20	0.88
		Mercury	1.28E-04	5.62E-04
		Methanol	4.10	13.90
		Nickel	4.45E-03	1.95E-02
		Styrene	0.30	0.90

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
02	Dry Kiln #2	VOC	31.3 <sup>B</sup>	236.3 <sup>A</sup>
		Acetaldehyde	0.35 <sup>B</sup>	2.64 <sup>A</sup>
		Acrolein	0.06 <sup>B</sup>	0.41 <sup>A</sup>
		Methanol	1.90 <sup>B</sup>	13.90 <sup>A</sup>
		Formaldehyde	0.20 <sup>B</sup>	1.10 <sup>A</sup>
06	Sawmill	PM	13.9	60.8
		PM <sub>10</sub>	0.4	1.3
12	Wood-Fired Boiler #1 (29.56 MMBTU/hr)	PM	5.2	22.4
		PM <sub>10</sub>	4.3	18.7
		SO <sub>2</sub>	0.5	2.2
		VOC	0.6	2.7
		CO	15.0	65.7
		NO <sub>x</sub>	8.5	37.3
		Acrolein	0.2	0.6
		Benzene	0.2	0.6
		Cadmium	6.71E-04	2.94E-03
		Chromium	6.19E-04	2.71E-03
		Formaldehyde	0.2	0.6
		HCl	0.42	1.82
		Lead	7.61E-04	3.33E-03
		Manganese	7.32E-02	0.32
		Mercury	4.25E-05	1.87E-04
Nickel	1.48E-03	6.47E-03		
Styrene	0.1	0.3		
13	Wood-Fired Boiler #2 (29.56 MMBTU/hr)	PM	5.2	22.4
		PM <sub>10</sub>	4.3	18.7
		SO <sub>2</sub>	0.5	2.2
		VOC	0.6	2.7
		CO	15.0	65.7
		NO <sub>x</sub>	8.5	37.3
		Acrolein	0.2	0.6
		Benzene	0.2	0.6
		Cadmium	6.71E-04	2.94E-03
		Chromium	6.19E-04	2.71E-03
		Formaldehyde	0.2	0.6
		HCl	0.42	1.82
		Lead	7.61E-04	3.33E-03
		Manganese	6.77E-02	0.32
		Mercury	4.25E-05	1.87E-04
Nickel	1.48E-03	6.47E-03		
Styrene	0.1	0.3		

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
14	Dry Kiln #3	VOC	37.5 <sup>B</sup>	236.3 <sup>A</sup>
		Acetaldehyde	0.42 <sup>B</sup>	2.64 <sup>A</sup>
		Acrolein	0.07 <sup>B</sup>	0.41 <sup>A</sup>
		Methanol	2.20 <sup>B</sup>	13.90 <sup>A</sup>
		Formaldehyde	0.20 <sup>B</sup>	1.10 <sup>A</sup>
16	Wood-Fired Boiler #3 (29.75 MMBTU/hr)	PM	5.2	22.6
		PM <sub>10</sub>	4.3	18.8
		SO <sub>2</sub>	0.5	2.2
		VOC	0.6	2.7
		CO	15.0	65.7
		NO <sub>x</sub>	8.6	37.7
		Acrolein	0.2	0.6
		Benzene	0.2	0.6
		Cadmium	6.75E-04	2.96E-03
		Chromium	6.23E-04	2.73E-03
		Formaldehyde	0.2	0.6
		HCl	0.42	1.82
		Lead	7.66E-04	3.35E-03
		Manganese	5.38E-02	0.24
		Mercury	4.28E-05	1.88E-04
Nickel	1.49E-03	6.51E-03		
Styrene	0.1	0.3		
20	Log Yard Road	PM	5.6	24.2
		PM <sub>10</sub>	1.6	7.0
21	Planer Cyclone and Baghouse	PM	3.7	16.2
		PM <sub>10</sub>	1.5	6.6

<sup>A</sup> Total emissions for Dry Kilns #2 and #3.

<sup>B</sup> Maximum average hourly emission rate based on maximum kiln cycle capacity.

<sup>C</sup> Not included in VOC total.

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### SECTION III: PERMIT HISTORY

The initial permit #1681-A was issued on March 3, 1996. A Title V permit application was submitted for the Urbana sawmill on July 15, 1996, which included the following proposed changes to the existing SIP permit:

1. An increase in annual production at the facility;
2. Installation of two wood-fired boilers.
3. Installation of a third dry kiln, a cyclone, and other equipment.

The original Title V permit, #1681-AOP-R0, was issued on September 12, 1997. It included some provisions in the specific conditions dealing with visible emissions from the boilers that reflected new EPA enforcement guidelines. These conditions were not included in the original Draft permit that had been submitted to Anthony Forest Products, and the company challenged these changes because they had been denied an opportunity to respond.

A revised version was prepared after discussion with the applicant, and issued as 1681-AOP-R1 on January 13, 1998.

Permit #1681-AOP-R2 was issued on August 6, 1999. This permit changed the required hourly steam readings in the wood-fired boilers from hourly readings to a maximum 24 hour rate of 489,600 pounds per day.

Permit #1681-AOP-R3 was issued on September 18, 2001. The Lumber Dry Kiln #1 (SN-01) has been removed from service as a result of a fire that destroyed the kiln and combustion equipment in April 2000. The permit minor modification also allowed increased production capacity for the Planer Mill (SN-03, 04, 07, and 15) and the two remaining Dry Kilns (SN-02 and 14). VOC annual emissions from Dry Kilns #2 and #3 have increased by 19.25 tpy, with decreases in other criteria pollutants based on revised estimates. There were no new emission sources.

Permit #1681-AOP-R4 was issued on June 14, 2002. Anthony requested to add a 29.8 MMBtu/hr wood-fired boiler (SN-16), a lumber drying kiln (SN-17), and to increase the permitted production capacity to 650,000 tons per year for the planer mill and the lumber kilns to 135,000,000 board feet per year to account for the increased production from the installation of a new kiln. Anthony also requested Planer Cyclone #3 (SN-15) to be removed because the cyclone was never installed. The source descriptions for the Planer Cyclone #1 and the Planer Mill emissions were revised. The emissions from the sawmill were declared as an insignificant activity in the previous permits; however, these emissions from the sawmill do not classify as an insignificant activity and will be included in this revision as a permitted emission source. Emissions generated from the bark and saw dust storage piles (SN-18) will also be included in the permit as a permitted emission source.

Permit #1681-AOP-R5 was issued on December 16, 2003. This was the first Title V Renewal for the facility. The facility also requested to install a completely enclosed air lock system to route shavings and sawdust from the Planer Mill (SN-07) to an existing fuel storage bin on an as

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needed basis. PM emissions did not change due to the installation of the air lock system, and the total waste from the Planer Mill did not increase. PM and VOC emissions increased by 48.2 tpy and 39.7 tpy, respectively. PM<sub>10</sub> and Heavy Metals emissions decreased by 23.5 tpy and 1.5 tpy, respectively. Changes in emissions are due to revised methods of calculation and updated emission factors.

Permit #1681-AOP-R6 was issued on March 23, 2007 to incorporate the applicable requirements of 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters* and to revise the particulate matter emission limits in order to account for emission control provided by the building enclosure. The VOC and HAP emission limits were also revised in order to correct a rounding error in the previous estimates. Dry Kiln #4 (SN-17) was removed. The two remaining dry kilns consumed the production capacity of Dry Kiln #4. Permitted PM and HAPs decreased by 25.1 tpy and 5.91 tpy, respectively. Permitted PM<sub>10</sub> and VOC increased by 2.4 tpy and 2.7 tpy, respectively.

Permit #1681-AOP-R7 was issued on July 31, 2007 which incorporated the applicable requirements of 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*. No physical changes or changes to method of operation were requested.

Permit #1681-AOP-R8 was issued on November 3, 2008. Emission calculations for PM<sub>10</sub> for several sources were revised based on updated emission factors and estimate methodology. As a result of these changes the permitted PM<sub>10</sub> emission from planer cyclones (SN-03 and SN-04) and the sawmill (SN-06) were reduced, and the permitted emissions from the bark (SN-18A), sawdust (SN-18B), and ash (SN-19) storage pile and the planer mill woodwaste bin (SN-07) were reclassified as insignificant activities (A-13). Emissions from the log yard road (SN-20) were identified and quantified for the first time. Anthony also requested to modify the PM and PM<sub>10</sub> emission limits by increasing the limits for all three boilers because Boiler #3 (SN-16) failed the required stack test. Overall, permitted PM and PM<sub>10</sub> emission limits decreased by 0.9 tpy and 58.9 tpy, respectively.

Permit #1681-AOP-R9 was issued on December 11, 2009 to use water instead of a chemical dust suppressant to control haul road dust emissions. Permitted PM and PM<sub>10</sub> limits increased 9.7 tpy and 2.8 tpy, respectively.

**SECTION IV: SPECIFIC CONDITIONS**

SN-02 and SN-14

Dry Kiln #2 and Dry Kiln #3

Source Description

Dry kilns #2 and #3 dehydrate lumber continuously, 8,760 hours per year. The kilns are permitted to produce 135 MMBF/yr of dried lumber. They operate exclusively on the steam from the three wood-fired boilers.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 19 §19.501 *et seq.* and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
02	VOC	31.3 <sup>B</sup>	
14	VOC	37.5 <sup>B</sup>	
Total	VOC	-	236.3 <sup>A</sup>

A Total VOC emissions for Dry Kilns #2 and #3.

B Maximum average hourly emission rate based on maximum kiln cycle capacity.

2. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 18 §18.801 and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
02	Acetaldehyde	0.35 <sup>B</sup>	-
	Acrolein	0.06 <sup>B</sup>	
	Methanol	1.90 <sup>B</sup>	
	Formaldehyde	0.20 <sup>B</sup>	
14	Acetaldehyde	0.42 <sup>B</sup>	-
	Acrolein	0.07 <sup>B</sup>	
	Methanol	2.20 <sup>B</sup>	
	Formaldehyde	0.20 <sup>B</sup>	
Total	Acetaldehyde	-	2.64 <sup>A</sup>
	Acrolein		0.41 <sup>A</sup>
	Methanol		13.90 <sup>A</sup>
	Formaldehyde		1.10 <sup>A</sup>

A Total VOC emissions for Dry Kilns #2 and #3.

B Maximum average hourly emission rate based on maximum kiln cycle capacity.

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3. The facility shall not exceed more than a total of 135 MMBF of kiln dried lumber produced in any consecutive 12 month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
  
4. The facility shall maintain records which demonstrate compliance with the limit set in Specific Condition #3 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's kiln production data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

SN-06

Sawmill

### Source Description

Logs are taken by truck to the sawmill where they are debarked and sawed into cants or rough lumber. The lumber is then edged and trimmed. Trimmings and edgings are routed to a chipper. Chips are pneumatically conveyed to shaker screens where blocks and fines are removed. The chips are then belt conveyed to a chip bin and eventually loaded into tractor trailers. Bark and sawdust are conveyed to boiler fuel storage. Excess material is routed to the loading stations, loaded into tractor trailers, and transported off-site for the use fuel.

Blocks are routed back to the chipper. Chipper fines are routed to the boiler fuel storage, or to a tractor trailer loader for shipment off-site. The blower which conveys the materials to the shaker screens has an associated cyclone which vents inside the sawmill building.

### Specific Conditions

5. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 19 §19.501 *et seq.* and 40 CFR Part 52, Subpart E]

Source Number	Pollutant	lb/hr	tpy
06	PM <sub>10</sub>	0.4	1.3

6. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 18 §18.801 and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311]

Source Number	Pollutant	lb/hr	tpy
06	PM	13.9	60.8

SN-12, SN-13, and SN-16

Wood Fired Boilers #1, #2, and #3

Source Description

The wood-fired boilers supply steam to the kilns, and burn southern pine sawdust, bark, and other wood residue, including shavings. The products of combustion are exhausted through three boiler stacks (SN-12, SN-13, and SN-16). Each boiler is equipped with a cyclone to control particulate emissions.

The three boilers, supplied by Wellons, Inc., are affected facilities as defined in Paragraph 60.40c of NSPS Subpart Dc- (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units). The two older boilers have a maximum design input capacity of 29.56 MMBtu/hr each, and the newest boiler has a design input capacity of 29.75 MMBtu/hr. The boilers are below the 30 MMBtu/hr threshold limit for the particulate standard contained in Paragraph 60.7 of the NSPS regulations. Based on the maximum throughput rate of 20,400 lb/hr of 422 °F steam at 300 psig, and feed water at 220 °F for Boiler #1 and Boiler #2 actual heat output has been calculated at 20.8 MMBtu/hr. Based on the maximum throughput rate of 20,700 lb/hr of 366 °F steam at 150 psig, and feed water at 220 °F for Boiler #3, actual heat output has been calculated at 20.9 MMBtu/hr.

Specific Conditions

7. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #9. [Regulation No. 19 §19.501 *et seq.* and 40 CFR Part 52, Subpart E]

Source Number	Pollutant	lb/hr	tpy
12	PM <sub>10</sub>	4.3	18.7
	SO <sub>2</sub>	0.5	2.2
	VOC	0.6	2.7
	CO	15.0	65.7
	NO <sub>x</sub>	8.5	37.3
13	PM <sub>10</sub>	4.3	18.7
	SO <sub>2</sub>	0.5	2.2
	VOC	0.6	2.7
	CO	15.0	65.7
	NO <sub>x</sub>	8.5	37.3
16	PM <sub>10</sub>	4.3	18.8
	SO <sub>2</sub>	0.5	2.2
	VOC	0.6	2.7
	CO	15.0	65.7
	NO <sub>x</sub>	8.6	37.7

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8. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #9. [Regulation No. 18 §18.801 and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311]

Source Number	Pollutant	lb/hr	tpy
12	PM	5.2	22.4
	Acrolein	0.2	0.6
	Benzene	0.2	0.6
	Cadmium	6.71E-04	2.94E-03
	Chromium	6.19E-04	2.71E-03
	Formaldehyde	0.2	0.6
	HCl	0.42	1.82
	Lead	7.61E-04	3.33E-03
	Manganese	7.32E-02	0.32
	Mercury	4.25E-05	1.87E-04
	Nickel	1.48E-03	6.47E-03
	Styrene	0.1	0.3
13	PM	5.2	22.4
	Acrolein	0.2	0.6
	Benzene	0.2	0.6
	Cadmium	6.71E-04	2.94E-03
	Chromium	6.19E-04	2.71E-03
	Formaldehyde	0.2	0.6
	HCl	0.42	1.82
	Lead	7.61E-04	3.33E-03
	Manganese	6.77E-02	0.32
	Mercury	4.25E-05	1.87E-04
	Nickel	1.48E-03	6.47E-03
	Styrene	0.1	0.3
16	PM	5.2	22.6
	Acrolein	0.2	0.6
	Benzene	0.2	0.6
	Cadmium	6.75E-04	2.96E-03
	Chromium	6.23E-04	2.73E-03
	Formaldehyde	0.2	0.6
	HCl	0.42	1.82
	Lead	7.66E-04	3.35E-03
	Manganese	5.38E-02	0.24
	Mercury	4.28E-05	1.88E-04
	Nickel	1.49E-03	6.51E-03
	Styrene	0.1	0.3

9. The amount of steam produced in each wood-fired boiler shall be limited according to the following table. Compliance with this condition shall be demonstrated through compliance with Specific Condition #10. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

Source Number	Description	Daily Limit (lb Steam/day)	Annual Limit (MM lb/12 month)
12	Boiler #1	489,600	178.7
13	Boiler #2	489,600	178.7
16	Boiler #3	489,600	178.7

10. The facility shall maintain records which demonstrate compliance with the limits set in Specific Condition #9 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's steam production data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]
  
11. The permittee shall not cause to be discharged to the atmosphere from sources SN-12, SN-13 and SN-16 visible emissions which exhibit an opacity greater than 20%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A. [Regulation No. 19 §19.501 and 40 CFR Part 52, Subpart E]
  
12. Weekly observations of the opacity from SN-12, SN-13, and SN-16 shall be conducted by personnel familiar with the visual emissions at the facility. The permittee shall accept such observation for demonstration of compliance. The permittee shall maintain personnel trained, but not necessarily certified, in EPA Reference 9. If visible emissions in excess of the permitted opacity are detected the permittee shall immediately take corrective action to identify the cause of the visible emissions, implement corrective actions, and document that visible emissions comply with the permitted opacity following the corrective action. The permittee shall maintain records which demonstrate compliance with Specific Condition #11. The records shall be updated weekly, kept on site, and made available to Department personnel upon request. The permittee shall maintain the following records: [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]
  - a. The date and time of the observation;
  - b. Detection of visible emissions over the permitted limits;
  - c. The cause of the exceedance of the opacity limit;
  - d. The corrective action taken;
  - e. The opacity after corrective action was taken; and
  - f. The name of the person conducting the opacity observations.
  
13. The permittee shall test source SN-16 for PM<sub>10</sub> while the source is operating at or above 90% of rated capacity using EPA Reference Methods 201A with 202. These tests shall be conducted within one hundred twenty (120) days of issuance of Permit No. 1681-

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AOP-R8. If the facility passes the PM<sub>10</sub> tests, the tests shall then be repeated once every five years. Failure of any test will require the permittee to repeat the testing every other year. Test results shall be maintained on-site, made available to Department personnel upon request, and shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]

SN-20

Log Yard Road

Source Description

Logs are delivered to the mill at the log yard located north of the main mill site. An unpaved road circles the log yard and is approximately 0.6 mi long. Emissions of particulate matter result from log truck traffic on this road.

Specific Conditions

14. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 19 §19.501 *et seq.* and 40 CFR Part 52, Subpart E]

Source Number	Pollutant	lb/hr	tpy
20	PM <sub>10</sub>	1.6	7.0

15. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 18 §18.801 and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311]

Source Number	Pollutant	lb/hr	tpy
20	PM	5.6	24.2

16. The permittee shall not operate in a manner such that emissions from the log yard roads (SN-20) would cause a nuisance off-site or allow visible emissions from extending beyond the property boundary. Under normal conditions, off-site opacity less than or equal to 5% shall not be considered a nuisance provided that there are no complaints received by the Department regarding dust from the facility. [§18.501 and A.C.A. §8 4-203 as referenced by §8-4-304 and §8-4-311]
17. The permittee shall water the roads as necessary to control emissions from extending beyond the property boundary. The permittee shall water the roads once per month or more frequently as determined by weekly observations. The permittee shall maintain records of observations and dates when water is applied. The permittee shall update these records following each observation and application. These records shall be kept onsite and be made available to Department personnel upon request. [§18.1004 and A.C.A. §8 4-203 as referenced by §8-4-304 and §8-4-311]
18. Dust suppression activities should be conducted in a manner and at a rate of application that will not cause runoff from the area being applied. Best Management Practices (40 CFR §122.44(k)) should be used around streams and waterbodies to prevent the dust

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suppression agent from entering Waters of the State. Except for potable water, no agent shall be applied within 100 feet of wetlands, lakes, ponds, springs, streams, or sinkholes. Failure to meet this condition may require the permittee to obtain a National Pollutant Discharge Elimination System (NPDES) permit in accordance with 40 CFR §122.1(b). [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-21

Planer Cyclone and Baghouse

Source Description

Dried lumber is stored in protected areas before planing. The dried lumber is planed in the planer mill prior to shipping. Two planers, a hammer hog, a trimmer, a rip saw, and a re-saw are located in the Planer Mill. This equipment vents to a cyclone which collects material (primarily shavings and sawdust). The cyclone has three duct inlets: one from planer #1, one from planer #2, and one from the baghouse dust relay system. The outlet of the cyclone vents to a baghouse (SN-21). Shavings and sawdust from the cyclones are dropped into a woodwaste storage bin (insignificant activity) where it is then loaded onto a truck and shipped off-site or, as needed, transferred through a closed pipe to the green wood fuel silo to be burned as fuel in the wood fuel boilers.

Specific Conditions

19. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 19 §19.501 *et seq.* and 40 CFR Part 52, Subpart E]

Source Number	Pollutant	lb/hr	tpy
21	PM <sub>10</sub>	1.5	6.6

20. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 18 §18.801 and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311]

Source Number	Pollutant	lb/hr	tpy
21	PM	3.7	16.2

21. The permittee shall not cause to be discharged to the atmosphere visible emissions from SN-21 which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A. [Regulation No. 19 §19.501 and 40 CFR Part 52, Subpart E]
22. Monthly observations of the opacity from SN-21 shall be conducted by personnel familiar with the visual emissions at the facility. The permittee shall accept such observation for demonstration of compliance. The permittee shall maintain personnel trained, but not necessarily certified, in EPA Reference 9. If visible emissions in excess of the permitted opacity are detected the permittee shall immediately take corrective action to identify the cause of the visible emissions, implement corrective actions, and document that visible emissions comply with the permitted opacity following the

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corrective action. The permittee shall maintain records which demonstrate compliance with Specific Condition #21. The records of each observation shall be updated by the 15<sup>th</sup> of the month following the month to which the records pertain, kept on site, and made available to Department personnel upon request. The permittee shall maintain the following records: [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

- a. The date and time of the observation;
- b. Detection of visible emissions over the permitted limits;
- c. The cause of the exceedance of the opacity limit;
- d. The corrective action taken;
- e. The opacity after corrective action was taken; and
- f. The name of the person conducting the opacity observations.

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## **SECTION V: COMPLIANCE PLAN AND SCHEDULE**

Anthony Forest Products Company will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

## SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide:
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms; and
  - d. Utilities for sampling and testing equipment.

[Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

### Title VI Provisions

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7. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
  - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
  
8. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC like appliance” as defined at §82.152)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  - 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.
  
9. 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.
  
10. 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

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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.

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

Permit Shield

- 12. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in the following table of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated May 12, 2008.

Applicable Regulations

Source No.	Regulation	Description
12, 13, 16	40 CFR 60, Subpart Dc	Standards of Performance for Small Industrial Commercial – Institutional Steam Generating Units
Facility	40 CFR Part 63, Subpart DDDD	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products

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### SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated May 12, 2008.

Description	Category
1000 gallon AST (gasoline)	A-13
500 gallon AST (diesel fuel)	A-3
1000 gallon AST (diesel fuel)	A-3
1000 gallon AST (diesel fuel)	A-3
Bark Storage Piles	A-13
Sawdust Piles	A-13
Boiler Ash Piles	A-13
Planer Mill Woodwaste Storage Bins	A-13

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## SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26)]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

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6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below:

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
  - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
    - i. The facility name and location;
    - ii. The process unit or emission source deviating from the permit limit;
    - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
    - iv. The date and time the deviation started;
    - v. The duration of the deviation;
    - vi. The average emissions during the deviation;
    - vii. The probable cause of such deviations;
    - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
    - ix. The name of the person submitting the report.

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

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]

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14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
  - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

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- d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
  
21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The compliance status;
  - c. Whether compliance was continuous or intermittent;
  - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
  - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
  
22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
  - 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. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  
24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
  - a. Such an extension does not violate a federal requirement;
  - b. The permittee demonstrates the need for the extension; and
  - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

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[Regulation 18, §18.314(A), Regulation 19, §19.416(A), Regulation 26, §26.1013(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
- a. Such a request does not violate a federal requirement;
  - b. Such a request is temporary in nature;
  - c. Such a request will not result in a condition of air pollution;
  - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
  - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
  - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

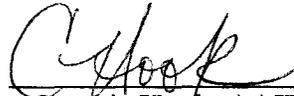
[Regulation 18, §18.314(B), Regulation 19, §19.416(B), Regulation 26, §26.1013(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
  - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
  - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), Regulation 26, §26.1013(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

**CERTIFICATE OF SERVICE**

I, Cynthia Hook, hereby certify that a copy of this permit has been mailed by first class mail to Anthony Forest Products Company, P.O. Box 724, Strong, AR, 71765, on this 31<sup>st</sup> day of August, 2010.



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Cynthia Hook, AAIL, Air Division