ADEQ

OPERATING

AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation No. 26:

Permit No. : 0193-AOP-R2

Renewal #1

IS ISSUED TO:

H. G. Toler & Son Lumber Company, Inc.
Hwy. 229
Leola, AR 72084
Grant County
AFIN: 27-00008

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

AND

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date

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List of Acronyms

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate matter
PM_{10}	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO_2	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	H. G. Toler & Son Lumber Company, Inc.
AFIN:	27-00008
PERMIT NUMBER:	0193-AOP-R2
FACILITY ADDRESS:	Hwy. 229
	Leola, AR 72084
MAILING ADDRESS	P.O. Box 125
	Leola, AR 72084
COUNTY:	Grant County
CONTACT POSITION:	Murry Toler
TELEPHONE NUMBER:	(870) 765-2211
REVIEWING ENGINEER:	Karen Cerney
UTM Zone	15
UTM North - South (Y):	3782.25
UTM East - West (X):	537.5

Section II: INTRODUCTION

Summary of Permit Activity

H. G. Toler & Son Lumber Company Inc. (Toler) owns and operates a lumber mill in Leola, Arkansas. This permitting action is a renewal with a modification to the facility's permit. This permit removes sources SN-06 and SN-09, increases hours of operation for SN-01 and SN-04, and updates emission factors. The proposed changes result in permitted emission increases of 1.7 tons per year (tpy) of SO_2, 14.5 tpy of NO_X, 0.3 tpy of Lead, and 10.5 tpy of HAPs. These HAP emissions are from existing sources, but were just not accounted for in previous permits.

Process Description

Whole logs are brought into the storage area. Depending on need, the logs may be stored on-site in the log yard, or routed directly into the process. From the log yard, the whole logs are fed onto the infeed deck by a loader. The infeed deck sends the logs to a cut-off saw where they are cut to the desired length.

The cut logs are then conveyed to a debarker, where the bark is mechanically removed. Material that is removed at this station and the sawdust from the cut-off saw are routed to the fuel house. The material will be used as fuel for the on-site boilers (SN-01 thru SN-03). The boilers are used only to provide steam to the on-site dry kilns.

When the cut, debarked logs arrive at the sawmill, they are transported to the saw carriage by chains. The logs are then sawn into lumber and cants. The cants are routed to a gangsaw and resaw where they are sawn into lumber. Transport to the saws is by chain conveyors.

Lumber from the saw carriage, gangsaw, and resaw which needs to be edged is sent to the edger by a belt conveyor and a series of chains. Lumber which has been edged is sent to the trimmer line by belt conveyors where the lumber is cut to the desired length.

Sawdust produced by the carriage bandsaw, resaw, gangsaw, edger, and trimmer is sent by belt or chain conveyor to the hog, and then to the boiler fuel house for stockpile until it is burned in the boilers.

Cutoffs from the gangsaw, resaw, trimmer, and edger are routed to a chipper by a series of chain conveyors. Once chipped, they are sized and blown to a loading bin by means of a six inch blow pipe. Emissions from this process are controlled by a cyclone (SN-07). Undersized chips are routed by a conveyor to the fuel house and will be used for boiler fuel.

Green, rough sawn lumber is then sorted and stacked for transportation to the main stacker. This is accomplished by chains and forklift trucks. The lumber is then stickered (stacked on small spacer pieces for better airflow) and sent to the dry kilns.

Lumber is then wheeled into the kiln on the railcarts and is dried by steam produced by the on-site boilers. The dry kilns (SN-09A, SN-09B, and SN-09C) have numerous roof vents and have no control equipment.

When the lumber has been dried to the necessary moisture content, the railcarts are removed from the dry kilns and are transported by forklift to the planer mill. Once dumped from the forklift, the dried lumber is then fed into the planer by chains. The planer surface finishes the dried lumber. Emissions from this source are controlled by a cyclone (SN-04). The surfaced lumber is then fed to a trimmer for final sizing. The finished trimmed lumber is then stacked for shipping.

A resaw is used to make shipping and stacking sticks. The cutoffs and sawdust from the resaw and trimmer are transported by a 16 inch diameter blowpipe to a cyclone (SN-08) on top of the boiler fuel house. Shavings from the planer mill are transported by a 16 inch diameter blowpipe to a cyclone (SN-05) located on top of the loading bin northwest of the planer mill.

There are two on site liquid fuel storage tanks. One tank holds diesel and is an insignificant source. The other tank holds gasoline and is shown as SN-10.

Boilers at this facility are not subject to 40 CFR Part 60, Subpart Dc due to the size and age of the equipment.

Regulations

The following table contains the regulations applicable to this permit.

Regulations

Source No.	Regulation Citations
Facility	Regulation 18, Arkansas Air Pollution Control Code
Facility	Regulation 19, Regulations of the Arkansas Plan of Implementation for Air Pollution Control
Facility	Regulation 26, Regulations of the Arkansas Operating Air Permit Program

The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

Emission Summary

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	42.8	109.8	N/A
		PM_{10}	41.3	102.7	
		SO_2	0.6	2.8	
		VOC	75.7	97.2	
		CO	15.7	69.1	
		NO_x	5.8	25.4	
		Lead*	0.3	0.3	
	HAPs	Acrolein*	0.11	0.47	
		Arsenic*	0.03	0.03	
		Benzene*	2.69	0.52	
		Chlorine*	0.03	0.08	
		Chromium VI*	0.03	0.03	
		Cumene*	0.52	0.01	
		Formaldehyde*	0.33	0.95	
		Hydrogen Chloride	0.50	2.20	
		Manganese*	0.05	0.19	
		Methanol*	2.88	5.66	
		Methyl-tert butyl ether*	7.90	0.09	
		Styrene*	0.05	0.22	
		Toluene*	7.93	0.20	
		Xylene*	6.34	0.10	
01	Stand-by Wood	PM	4.2	18.2	14

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
	Waste Boiler (150 Hp)	PM_{10}	3.7	16.3	
		SO_2	0.2	0.8	
		VOC	0.1	0.5	
		CO	4.3	18.9	
		NO_x	1.6	7.0	
		Lead*	0.1	0.1	
		Acrolein*	0.03	0.13	
		Arsenic*	0.01	0.01	
		Benzene*	0.03	0.13	
		Chlorine*	0.01	0.02	
		Chromium VI*	0.01	0.01	
		Formaldehyde*	0.03	0.14	
		Hydrogen Chloride	0.14	0.60	
		Manganese*	0.01	0.05	
		Styrene*	0.01	0.06	
		Toluene*	0.01	0.03	
		Xylene*	0.01	0.01	
02	Wood Waste Boiler (200 Hp)	PM	5.5	24.3	14
		PM_{10}	5.0	21.7	
		SO_2	0.2	1.0	
		VOC	0.2	0.7	
		CO	5.7	25.1	
		NO_x	2.1	9.2	

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
		Lead*	0.1	0.1	
		Acrolein*	0.04	0.17	
		Arsenic*	0.01	0.01	
		Benzene*	0.04	0.18	
		Chlorine*	0.01	0.03	
		Chromium VI*	0.01	0.01	
		Formaldehyde*	0.04	0.19	
		Hydrogen Chloride	0.18	0.80	
		Manganese*	0.02	0.07	
		Styrene*	0.02	0.08	
		Toluene*	0.01	0.04	
		Xylene*	0.01	0.01	
03	Wood Waste Boiler (200 Hp)	PM	5.5	24.3	14
		PM_{10}	5.0	21.7	
		SO_2	0.2	1.0	
		VOC	0.2	0.7	
		CO	5.7	25.1	
		NO_x	2.1	9.2	
		Lead*	0.1	0.1	
		Acrolein*	0.04	0.17	
		Arsenic*	0.01	0.01	
		Benzene*	0.04	0.18	
		Chlorine*	0.01	0.03	

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
		Chromium VI*	0.01	0.01	
		Formaldehyde*	0.04	0.19	
		Hydrogen Chloride	0.18	0.80	
		Manganese*	0.02	0.07	
		Styrene*	0.02	0.08	
		Toluene*	0.01	0.04	
		Xylene*	0.01	0.01	
04	Planer Mill Cyclone	PM	6.9	12.9	19
		PM_{10}	6.9	12.9	
05	Shavings Bin Cyclone	PM	6.9	12.9	19
		PM_{10}	6.9	12.9	
06	Shavings Bin Loadout Cyclone	Removed			
07	Load Out Chip Bin Cyclone	PM	6.9	8.6	19
		PM_{10}	6.9	8.6	
08	Boiler House Fuel Cyclone	PM	6.9	8.6	22
		PM_{10}	6.9	8.6	
09A-C	Dry Kilns	VOC	48.0	94.3	24
		Formaldehyde*	0.22	0.43	
		Methanol*	2.88	5.66	
09D	Dry Kiln	Out of Service			
10	Storage Tank	VOC	27.2	1.0	26
		Benzene*	2.58	0.03	

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
		Cumene*	0.52	0.01	
		Methyl-tert butyl ether*	7.90	0.09	
		Toluene*	7.90	0.09	
		Xylene*	6.31	0.07	

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

Section III: PERMIT HISTORY

H. G. Toler received their initial permit, 193-A, for an existing facility on October 25, 1973. This permit included the addition of a wood fired boiler that has the capability to burn approximately 37.5 tons of bark and green sawdust per hour. The Department conducted a visual inspection of the boiler and concluded that it would meet Section 4 of the Arkansas Air Pollution Control Code as amended July 7, 1972, except during start-up.

H. G. Toler received their second permit, 193-AR-1, on April 12, 1996. This modification allowed the facility to be in compliance with the State Implementation Plan. This included adding emission limits and specific conditions that were not included in the previous permit and permitting all equipment that was not currently permitted.

H. G. Toler received their first operating air permit (Title V), 193-AOP-R0, for the facility under Regulation #26 on June 1, 1999. This facility was classified as a major source due to VOC emissions exceeding the 100 ton per year (tpy) threshold. This permit allowed the facility to construct a new Planer Mill, increase production through existing Dry Kilns and permit an existing gasoline storage tank. Overall emissions were increased due to different emission factors and additional equipment.

H. G. Toler & Son Lumber Company, Inc. received their first modification to their Title V permit, 193-AOP-R1, on November 15, 2000. This permit modification allowed the wood fired boilers to operate under the less stringent opacity regulations for wood fired boilers in Regulation 18, §18.501, and Regulation 19, §19.503. Additionally, the boilers (SN-01 thru -03) were now permitted at maximum capacity in order to eliminate the recordkeeping of material sent to the boiler fuel house (SN-08), and the permitted amount of lumber processed through the dry kilns (SN-09A thru -09D) had been reduced to what could be dried with the existing boiler capacity.

Section IV: SPECIFIC CONDITIONS

Source No. SN-01 through SN-03
Wood Waste Boilers

Description

Toler operates three boilers at their facility in Leola. The Stand-by Wood Waste Boiler (SN-01) has a maximum heat input capacity of 7.2 MMBtu/hr (150 HP) with the other two Wood Waste Boilers (SN-02 and -03) having a maximum heat input capacity of 9.6 MMBtu/hr (200 HP) each. SN-01 was installed in 1957, SN-02 in 1963, and SN-03 in 1973.

None of these boilers have any control equipment associated with them and are restricted to burning only wood waste as fuel. Cutoffs and sawdust from the wood working areas will be stored on-site as fuel for the boilers or sold to another facility for fuel. The boilers are used only to provide steam to the on-site dry kilns.

Specific Conditions

1. The permittee will not exceed the emission rates set forth in the following table. The pollutant emission rate limits are based upon the maximum capacity of the equipment. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999 and 40 CFR Part 52, Subpart E]

SN-01 through SN-03 Maximum Criteria Emission Rates

SN	Description	Pollutant	lb/hr	tpy
01	Stand-by Wood Waste Boiler (150 Hp)	PM_{10}	3.7	16.3
		SO_2	0.2	0.8
		VOC	0.1	0.5
		CO	4.3	18.9
		NO_X	1.6	7.0
		Lead	0.1	0.1
02	Wood Waste Boiler (200 Hp)	PM_{10}	5.0	21.7
		SO_2	0.2	1.0
		VOC	0.2	0.7
		CO	5.7	25.1
		NO_X	2.1	9.2
		Lead	0.1	0.1
03	Wood Waste Boiler	PM_{10}	5.0	21.7

SN	Description	Pollutant	lb/hr	tpy
	(200 Hp)	SO_2	0.2	1.0
		VOC	0.2	0.7
		CO	5.7	25.1
		NO_X	2.1	9.2
		Lead	0.1	0.1

2. The permittee will not exceed the emission rates set forth in the following table. The pollutant emission rate limits are based upon the maximum capacity of the equipment. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-01 through SN-03 Maximum Non-Criteria Emission Rates

SN	Description	Pollutant	lb/hr	tpy
01	Stand-by Wood Waste Boiler (150 Hp)	PM	4.2	18.2
		Acrolein	0.03	0.13
		Arsenic	0.01	0.01
		Benzene	0.03	0.13
		Chlorine	0.01	0.02
		Chromium VI	0.01	0.01
		Formaldehyde	0.03	0.14
		Hydrogen Chloride	0.14	0.60
		Manganese	0.01	0.05
		Styrene	0.01	0.06
		Toluene	0.01	0.03
		Xylene	0.01	0.01
02	Wood Waste Boiler (200 Hp)	PM	5.5	24.3
		Acrolein	0.04	0.17
		Arsenic	0.01	0.01
		Benzene	0.04	0.18

SN	Description	Pollutant	lb/hr	tpy
		Chlorine	0.01	0.03
		Chromium VI	0.01	0.01
		Formaldehyde	0.04	0.19
		Hydrogen Chloride	0.18	0.80
		Manganese	0.02	0.07
		Styrene	0.02	0.08
		Toluene	0.01	0.04
		Xylene	0.01	0.01
03	Wood Waste Boiler (200 Hp)	PM	5.5	24.3
		Acrolein	0.04	0.17
		Arsenic	0.01	0.01
		Benzene	0.04	0.18
		Chlorine	0.01	0.03
		Chromium VI	0.01	0.01
		Formaldehyde	0.04	0.19
		Hydrogen Chloride	0.18	0.80
		Manganese	0.02	0.07
		Styrene	0.02	0.08
		Toluene	0.01	0.04
		Xylene	0.01	0.01

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method

SN-01 through SN-03 Visible Emissions

SN	Limit	Regulatory Citation
01	40%	§19.503 of Regulation 19
02	40%	§19.503 of Regulation 19

SN	Limit	Regulatory Citation
03	20%	§19.503 of Regulation 19

4. Daily observations of the opacity from sources SN-01, SN-02, and SN-03 will be conducted by a person trained, but not necessarily certified, in EPA Reference Method 9. The observations on the weekend may be conducted by a person who is familiar with the emissions from the boiler, but not necessarily formally trained in EPA Reference Method 9. If emissions which appear to be in excess of 40% (SN-01 and SN-02) and 20% (SN-03) are observed, the permittee will take immediate action to identify and correct the cause of the visible emissions. After corrective action has been taken, the permittee will conduct another observation of the opacity from the source in question. If visible emissions which appear to be in excess of the 20% and 40% limits are present after corrective action has been taken, the permittee will conduct another observation of the opacity from the source in question. If visible emissions which appear to be in excess of the limits are still observed, a 6 minute visible emissions reading will be conducted by a person certified in EPA Reference Method 9 to determine if the opacity is less than the permitted limit. If no Method 9 reading is conducted despite emissions appearing to be in excess of the permitted limit after corrective action has been taken, the permittee will be considered to be out of compliance with the opacity limit for that day. The Department reserves the right to specify the time within which Method 9 reading must take place if visible emissions appearing to be in excess of the permitted limit are observed after the corrective action has taken place. The permittee will maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records will be updated daily, kept on site, and made available to Department personnel upon request.

   a. The date and time of all observations.

   b. If visible emissions which appeared to be above the permitted level were detected.

   c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, if the visible emissions appeared to be below the permitted limit after the corrective action was taken, and the results of any EPA Reference Method 9 readings.

   d. The name of the person conducting the opacity observations.

5. The permittee will use only wood to fuel the boilers. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Source No. SN-04 through SN-07
Wood Working

Description

Whole logs are brought into the storage area when needed. They are fed onto the infeed deck by a loader. The infeed deck sends the logs to a cut-off saw, where they are cut to the desired length. The cut logs are then conveyed to a debarker, where the bark is mechanically removed. Material that is removed at this station and the sawdust from the cut-off saw are routed to the fuel house. When the cut, debarked logs arrive at the sawmill they are transported to the saw carriage by chains. The logs are then sawn into lumber and cants. The cants are routed to a gangsaw and resaw where they are sawn into lumber. Lumber from the saw carriage, gangsaw, and resaw which needs to be edged is sent to the edger by a belt conveyor and a series of chains. Lumber which has been edged is sent to the trimmer line by belt conveyors where the lumber is cut to the desired length. Sawdust produced by the carriage bandsaw, resaw, gangsaw, edger, and trimmer is sent by belt or chain conveyor to the hog. From the hog, sawdust goes to the boiler fuel house for stockpile until it is burned in the boilers. Cutoffs from the gangsaw, resaw, trimmer, and edger are routed to a chipper by a series of chain conveyors. Once chipped, they are sized and blown to a loading bin by means of a six inch blow pipe. Undersized chips are routed by a conveyor to the fuel house and will be used for boiler fuel.

When the lumber has been dried to the necessary moisture content, the railcarts are removed from the dry kilns and are transported by forklift to the planer mill. Once dumped from the forklift the dried lumber is then fed into the planer by chains. The planer surface finishes the dried lumber. The surfaced lumber is then fed to a trimmer for final sizing. The finished trimmed lumber is then stacked for shipping. A resaw is used to make shipping and stacking sticks. The cutoffs and sawdust from the resaw and trimmer are transported by a 16 inch diameter blowpipe to a cyclone on top of the boiler fuel house. Shavings from the planer mill are transported by a 16 inch diameter blowpipe to two cyclones located on top of the loading bin northwest of the planer mill.

Specific Conditions

6. The permittee will not exceed the emission rates set forth in the following table. The pollutant emission rate limits are based upon the maximum capacity of the equipment. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999 and 40 CFR Part 52, Subpart E]

SN-04 through SN-07 Maximum Criteria Emission Rates

SN	Description	Pollutant	lb/hr	tpy
04	Planer Mill Cyclone	PM_{10}	6.9	12.9
05	Shavings Bin Cyclone	PM_{10}	6.9	12.9
06	Shavings Bin Loadout Cyclone	Removed		
07	Loadout Chip Bin Cyclone	PM_{10}	6.9	8.6

7. The permittee will not exceed the emission rates set forth in the following table. The pollutant emission rate limits are based upon the maximum capacity of the equipment. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-04 through SN-07 Maximum Non-Criteria Emission Rates

SN	Description	Pollutant	lb/hr	tpy
04	Planer Mill Cyclone	PM	6.9	12.9
05	Shavings Bin Cyclone	PM	6.9	12.9
06	Shavings Bin Loadout Cyclone	Removed		
07	Loadout Chip Bin Cyclone	PM	6.9	8.6

8. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN-04 through SN-07 Visible Emissions

SN	Limit	Regulatory Citation
04	10%	§18.501 of Regulation 18
05	10%	§18.501 of Regulation 18
07	10%	§18.501 of Regulation 18

9. Weekly observations of the opacity from sources SN-04 through SN-07 will be conducted by a person familiar with the permittee's visible emissions The permittee will accept such observations for demonstration of compliance. The permittee will maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee will 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 will maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records will be updated weekly, kept on site, and made available to Department personnel upon request.

   a. The date and time of all observations.

   b. If visible emissions which appeared to be above the permitted level were detected.

   c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.

   d. The name of the person conducting the opacity observations.

Source No. SN-08
Boiler House Fuel

Description

A cyclone is used to control particulate emissions from the wood waste used as boiler house fuel.

Specific Conditions

10. The permittee will not exceed the emission rates set forth in the following table. The pollutant emission rate limits are based upon the maximum capacity of the equipment. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999 and 40 CFR Part 52, Subpart E]

SN-08 Maximum Criteria Emission Rates

SN	Description	Pollutant	lb/hr	tpy
08	Boiler House Fuel Cyclone	PM_{10}	6.9	8.6

11. The permittee will not exceed the emission rates set forth in the following table. The pollutant emission rate limits are based upon the maximum capacity of the equipment. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-08 Maximum Non-Criteria Emission Rates

SN	Description	Pollutant	lb/hr	tpy
08	Boiler House Fuel Cyclone	PM	6.9	8.6

12. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN-08 Visible Emissions

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

13. Weekly observations of the opacity from sources SN-08 will be conducted by a person familiar with the permittee's visible emissions. The permittee will accept such observations for demonstration of compliance. The permittee will maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee will 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 will maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records will be updated weekly, kept on site, and made available to Department personnel upon request.

    a. The date and time of all observations.

    b. If visible emissions which appeared to be above the permitted level were detected.

c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.

d. The name of the person conducting the opacity observations.

Source No. SN-09A through 09D
Dry Kilns

Description

Lumber from the sawmill is stacked on small spacer pieces of cut lumber for better airflow when it is sent to the Dry Kilns. These stacks of lumber are then wheeled into the kiln on railcarts and dried by steam produced by the on-site boilers. When the lumber has been dried to the necessary moisture content, the railcarts are removed from the Dry Kilns and are transported by forklift to the planer mill. The dry kilns have numerous roof vents and have no control equipment. Hourly emissions for these four kilns are based on an hourly throughput of 4,566 board feet per kiln.

Specific Conditions

14. The permittee will not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Specific Condition 16. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999 and 40 CFR Part 52, Subpart E]

SN-9A through SN-09D Maximum Criteria Emission Rates

SN	Description	Pollutant	lb/hr	tpy
09A-09C	Primary and Secondary Dry Kilns	VOC	48.0	94.3
09D	Secondary Dry Kiln	Removed from Service		

15. The permittee will not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by Specific Condition 16. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-09A through SN-09D Maximum Non-Criteria Emission Rates

SN	Description	Pollutant	lb/hr	tpy
09A-09C	Primary and Secondary Dry Kilns	Formaldehyde	0.22	0.43
		Methanol	2.88	5.66
09D	Secondary Dry Kiln	Removed from Service		

16. The permittee will not exceed a total throughput of 53.9 million board feet (MM bd ft) in any twelve consecutive month period for SN-09A through SN-09C combined. Compliance with this condition is shown through Specific Condition 17. [Regulation 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

17. The permittee will maintain records that show compliance with Specific Condition 16. These records will be updated by the fifth day of the month following the month for which the records pertain. These records will be maintained onsite and submitted in accordance with General Provision 7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

Source No. SN-10
Storage Tank

Description

Toler operates a 5,000 gallon gasoline storage tank on-site to supply various machinery and equipment with fuel.

Specific Conditions

18. The permittee will not exceed the emission rates set forth in the following table. The pollutant lb/hr emission rate limits are based upon the maximum capacity of the equipment. The permittee will demonstrate compliance with the annual emission rate limits by compliance with Specific Condition 20. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999 and 40 CFR Part 52, Subpart E]

SN-10 Maximum Criteria Emission Rates

SN	Description	Pollutant	lb/hr	tpy
10	Storage Tank	VOC	27.2	1.0

19. The permittee will not exceed the emission rates set forth in the following table. The pollutant lb/hr emission rate limits are based upon the maximum capacity of the equipment. The permittee will demonstrate compliance with the annual emission rate limits by compliance with Specific Condition 20. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-10 Maximum Non-Criteria Emission Rates

SN	Description	Pollutant	lb/hr	tpy
10	Storage Tank	Benzene	2.58	0.03
		Cumene	0.52	0.01
		Methyl-tert butyl ether	7.90	0.09
		Toluene	7.90	0.09
		Xylene	6.31	0.07

20. The permittee will not receive in excess of 25,000 gallons of unleaded gasoline in any twelve consecutive month period. Compliance with this condition is shown through Specific Condition 21. [Regulation 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

21. The permittee will maintain records that show compliance with Specific Condition 20. These records will be updated by the fifth day of the month following the month for which the records pertain. These records will be maintained onsite and submitted in accordance with General Provision 7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

Section V: COMPLIANCE PLAN AND SCHEDULE

H. G. Toler & Son Lumber Company, Inc. currently has a drafted Consent Administrative Order (CAO) LIS 04-106 that will be effective September 10, 2004. The facility will submit a report to fulfill the requirements of the CAO. The facility will continue to operate in compliance with the 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: PLANT WIDE CONDITIONS

1. The permittee will 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 No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §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 No. 19 §19.410(B) and 40 CFR Part 52, Subpart E]

3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No. 19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

4. The permittee must provide: [Regulation No. 19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

    a. Sampling ports adequate for applicable test methods;

    b. Safe sampling platforms;

    c. Safe access to sampling platforms; and

    d. Utilities for sampling and testing equipment.

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No. 19 §19.303 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. If any changes are proposed which would require a PSD review if the facility were a major source, a determination will be made as to whether the facility has been operating as a major source for PSD. To do this, the facility will test the boilers (SN's 01-03) for CO using EPA Reference Method 10. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]

Title VI Provisions

8. 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.

9. 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.

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

Section VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §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 **4/23/04** and a letter dated **August 16, 2004.**

Insignificant Activities

Description	Category
Diesel Storage Tank, 5,000 gallons	A-3

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

Section VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 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), effective August 10, 2000]

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 No. 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 No. 26 §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]

    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.

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 No. 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: [40 C.F.R. 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation No. 26]

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

8. The permittee will 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 19.601), 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.

   The permittee will 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 will 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 in the initial and full report required in 8a.

[40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A.§8-4-203, as referenced by §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 No. 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 No. 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 No. 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 No. 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 No. 26 §26.701(F)(4)]

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 No. 26 §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 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 No. 26 §26.701(H)]

17. If the permit allows different operating scenarios, the permittee will, 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 No. 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 No. 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 No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 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 No. 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

    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 will 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 No. 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 No. 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 §8-4-304 and §8-4-311]