OPERATING AIR PERMIT

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

Permit #: 463-AOP-R1

IS ISSUED TO:

International Paper Company
Highway 67 North
Gurdon, AR 71743
Clark County
CSN: 10-0005

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:

December 16, 1998 and December 15, 2003

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Modified Date

SECTION I: FACILITY INFORMATION

PERMITTEE:	International Paper Company
CSN:	10-0005
PERMIT NUMBER:	463-AOP-R1
FACILITY ADDRESS:	Highway 67 North Gurdon, Arkansas 71743
COUNTY:	Clark
CONTACT PERSON:	Tim Newton
TELEPHONE NUMBER:	(870) 353-5342
REVIEWING ENGINEER:	Melissa Patangia
UTM North-South (X):	3756.42 North
UTM East-West (Y):	468.22 East
LATITUDE:	33° 57' 0" North
LONGITUDE:	93° 8' 54" West

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Permit #: 463-AOP-R1
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SECTION II: INTRODUCTION

The International Paper Company (IP) owns and operates a wood products plant near Gurdon, Clark County, Arkansas to manufacture plywood, lumber, and landscaping timbers (SIC codes 2421, 2436). The processes at the facility include log sawing, debarking, veneer peeling, plywood gluing and pressing, and lumber drying.

Process Description

The process at this facility begins when the logs are delivered to the plant by truck. The logs are examined in order to determine what portion will be cut into sawlogs or plyblocks. Low quality logs are debarked, chipped, and sent to a paper mill. Plyblocks and sawlogs are transferred to a ring debarker. All the bark is shredded and sent to a fuel storage building at the powerhouse.

The sawlogs are moved onto the sawmill where they are cut into rough green lumber. The green lumber is placed in one of three steam heated drying kilns. Green lumber from other facilities is received at the Gurdon facility for drying. The dried lumber is placed in cooling sheds to await further processing. From the cooling sheds, the rough lumber enters the planer mill where it is planed to its finished dimensions. The planer shavings are collected by a cyclone and baghouse and are either sold as a by-product or conveyed to the fuel storage building at the powerhouse.

In the manufacture of plywood, the plyblocks go first to the plyblock heating vats for heating prior to the veneer peeling process. The plyblocks are rotated as a blade cuts a thin continuous layer of wood, a veneer, from the plyblock. The veneer is passed through one of three veneer dryers to reduce the moisture content. The drying process releases volatile organic compounds of which 95% are captured and ducted to an incinerator. The dried veneer is placed on the panel assembly line and sprayed with glue. A core sheet is then placed at a right angle on the first sheet and it is sprayed with glue. This process is repeated until the desired thickness is attained. The assembly is then sent to a pre-press and then on to a steam heated hot press where, under pressure and heat, the glue is set and the product is formed. The finished plywood is trimmed and sanded, and some is paper coated before shipping. Some veneer is sold and not processed into panels.

Annually this facility has the capacity to process 1,508,000 tons of logs, dry 144,000,000 board feet of lumber, and manufacture 367,044,000 square feet of 3/8" equivalent plywood.

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Regulations

In addition to Regulation #19 and Regulation #26, IP is subject to requirements of federal regulations including New Source Performance Source Standards 40 CFR 60 Subpart Dc-*Standards for Small Industrial-Commercial- Institutional Steam Generating Units* and 40 CFR 60 Subpart Kb-*Standards of Performance for Volatile Organic Liquid Storage Vessels*.

Also IP is a major air pollutant source for particulate matter (PM/PM_{10}), volatile organic compounds (VOC), carbon monoxide (CO), and nitrogen oxides (NO_X), and therefore, is subject to Prevention of Significant Deterioration (PSD) regulations as defined in Regulation 19.9 and 40 CFR 52.21.

Summary of Proposed Modifications

1. The first project is the sawmill modernization project. The objective is to reconfigure the sawmill (SN-23). This project will also require minor changes in the wood preparation area. There will be no increase in the permitted emission rates of SN-23.

2. The second project is the sawdust project. This project affects the by-product handling operation. This project will involve the installation of additional handling equipment. The new permitted emission rates for this project are as follows:

SN-25 (existing source)	PM/PM_{10}	2.2 lb/hr	3.3 ton/yr*
SN-29 (new source)	PM/PM_{10}	2.0 lb/hr	8.8 ton/yr

* this change is the result of a correction in the annual chip production rate

[Note: The above proposed projects will increase flexibility and reduce costs but will not increase the production capacity of the facility.]

3. The new emission rates for SN-26 are as follows (this represents a decrease in permitted emissions):

PM/PM_{10}	9.1 lb/hr	22.7 ton/yr*

* this change is due to the paving of most plant roads and vacuuming for dust control

4. The regulatory citations in the permit were updated.

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A summary of facility wide emissions is provided in the following table. Specific emission unit information is located by the indicated cross reference pages.

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions 1 - These totals do not include short term (hourly) emission rates from the drying kilns (SN-06, SN-07, SN-08).		PM PM_{10} SO_2 VOC[1] CO NO_X Acetone[1] <u>HAPs</u> Acetaldehyde[1] Acrolein Arsenic Benzine Cadmium Chromium Cobalt Formaldehyde[1] Lead Manganese Methanol[1] Phenol POM	102.2 102.2 6.2 61.2 418.8 67.5 0.7 0.7 0.1 0.2 0.2 0.2 0.2 0.2 0.8 0.2 1.2 10.6 0.4 0.2	385.3 385.3 27.1 697.1 1834.5 295.6 5.0 13.9 0.3 0.2 0.6 0.2 0.2 0.2 7.3 1.0 5.0 36.8 0.5 0.4	
SN-01	#1 Wood Residue Fired Boiler (135 MMBTU/hr) (This source has a CEMS) (Installed 1979)	PM PM_{10} SO_2 VOC CO NO_X Arsenic Benzine Cadmium Chromium Cobalt Formaldehyde Lead Manganese Phenol POM	25.0 25.0 3.0 10.0 200.0 28.5 0.1 0.1 0.1 0.1 0.1 0.1 0.1 0.6 0.1 0.1	109.5 109.5 13.1 43.8 876.0 124.8 0.1 0.3 0.1 0.1 0.1 0.5 0.5 2.5 0.1 0.2	11

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-02	#2 Wood Residue Fired Boiler (135 MMBTU/hr) (This source has a CEMS) (Installed 1979)	PM PM_{10} SO_2 VOC CO NO_X Arsenic Benzine Cadmium Chromium Cobalt Formaldehyde Lead Manganese Phenol POM	25.0 25.0 3.0 10.0 200.0 28.5 0.1 0.1 0.1 0.1 0.1 0.1 0.1 0.6 0.1 0.1	109.5 109.5 13.1 43.8 876.0 124.8 0.1 0.3 0.1 0.1 0.1 0.5 0.5 2.5 0.1 0.2	11
SN-03 SN-04 SN-05	#1, #2, and #3 Veneer Dryers (Cooling vents that are not incinerated, the rest go to SN-22, the Veneer Dryer Incinerator)	PM PM_{10} VOC Acetone Acetaldehyde Formaldehyde Methanol	7.7 7.7 16.9 0.1 0.3 0.1 0.3	30.2 30.2 66.1 0.3 1.1 0.4 1.1	16
SN-06	#1 Lumber Kiln (12 Stacks) 2 - The short term rates are in pounds per charge.	VOC[2] Acetone[2] Acetaldehyde[2] Formaldehyde[2] Methanol[2]	870.0 5.8 22.8 8.7 22.8	156.4 1.0 3.8 1.5 3.8	17
SN-07	#2 Lumber Kiln (12 Stacks) 2 - The short term rates are in pounds per charge.	VOC[2] Acetone[2] Acetaldehyde[2] Formaldehyde[2] Methanol[2]	870.0 5.8 22.8 8.7 22.8	156.4 1.0 3.8 1.5 3.8	17
SN-08	#3 Lumber Kiln (12 Stacks) 2 - The short term rates are in pounds per charge.	VOC[2] Acetone[2] Acetaldehyde[2] Formaldehyde[2] Methanol[2]	870.0 5.8 22.8 8.7 22.8	156.4 1.0 3.8 1.5 3.8	17
SN-09	Rechipper Cyclone	Removed from service September 4, 1994			

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-10	Chip Fines Cyclone	PM PM_{10}	2.0 2.0	8.8 8.8	19
SN-11	Planer Shavings Cyclone	PM PM_{10}	2.0 2.0	8.8 8.8	20
SN-12	Dry Wood Fuel Transfer Cyclone	PM PM_{10}	2.0 2.0	8.8 8.8	21
SN-13	Dry Wood Fuel Truck Cyclone	PM PM_{10}	2.0 2.0	8.8 8.8	21
SN-14	Dry Wood Fuel Cyclone (Powerhouse)	PM PM_{10}	2.0 2.0	8.8 8.8	21
SN-15	Sander Dust Cyclone	PM PM_{10}	2.0 2.0	8.8 8.8	22
SN-16	Sander Dust Cyclone (Powerhouse)	PM PM_{10}	2.0 2.0	8.8 8.8	22
SN-17 SN-18 SN-19 SN-20 SN-21	Press Fans #1 - #5	PM PM_{10} VOC Acetone Acetaldehyde Acrolein Formaldehyde Methanol Phenol	1.3 1.3 6.3 0.5 0.4 0.1 0.4 4.7 0.2	4.5 4.5 22.0 1.5 1.4 0.3 1.1 16.2 0.3	24
SN-22	Veneer Dryer Incinerator and Heat Recovery Boiler (Installed 1994) (Incinerator-50 MM BTU/hr) (H.R. Boiler Aux. Burner- 55 MM BTU/hr)	PM PM_{10} SO_2 VOC CO NO_X Acetone Formaldehyde	4.6 4.6 0.2 9.2 18.8 10.5 0.1 0.1	20.2 20.2 0.9 40.3 82.5 46.0 0.2 0.3	26
SN-23	Log Sawing	PM PM_{10}	9.9 9.9	13.2 13.2	29
SN-24	Debarking	PM PM_{10}	1.4 1.4	1.8 1.8	29

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-25	By-Product Transfer Points	PM PM_{10}	2.2 2.2	3.3 3.3	31
SN-26	Plant Haul Roads (Fugitives)	PM PM_{10}	9.1 9.1	22.7 22.7	31
SN-27	No. 12 Diesel Tank	VOC	0.6	0.1	34
SN-28	Frosto/Tanner Gas (Fugitives)	VOC Methanol	8.2 5.6	11.8 8.1	35
SN-29	Sawdust & Fines Cyclone	PM PM_{10}	2.0 2.0	8.8 8.8	31

SECTION III: PERMIT HISTORY

In March 1975, International Paper Company (IP) purchased the Arkla Gas Company's Pineply Plywood Plant at Gurdon, Arkansas. On March 24, 1978, IP received a SIP air permit, Permit #463-A, for the expansion, modification, and operation of the existing facility. Because the permit was issued after March 1, 1978, the facility was also required to obtain a permit from the EPA, issued in accordance with PSD regulations promulgated on June 19, 1978. The PSD permit was issued July 13, 1979.

Permit #463-AR-1 was issued on March 25, 1983, to change the PM/PM_{10} and the CO emissions rates on the two wood residue fired boilers (SN-01 and SN-02). Emission rates in permit #463-A were based upon estimates before the construction of the wood residue fired boilers. During compliance testing and a subsequent two week testing period, it was determined that the actual emissions were much higher.

Permit #463-AR-2 was issued on March 25, 1993, to allow IP to increase plywood production 113%, establish a lumber production rate of 144 Million board feet per year, allow the installation of emission control devices on the veneer dryers, and to allow the burning of small quantities of glue, hydraulic oil, and motor oil in the wood residue fired boilers (SN-01 and SN-02).

Permit #463-AR-3 was issued on January 16, 1996, to permit the installation and operation of a fourth plywood press, a new pre-press, and a new lay up line. This addition alleviated a bottleneck in the plywood manufacturing line. It did not constitute an increase in the potential to emit, on an annual basis.

Permit #463-AOP-R0 was issued on December 16, 1998. This was the first permit issued to the facility under Regulation #26.

SECTION IV: EMISSION UNIT INFORMATION

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SN-01, #1 Wood Residue Fired Boiler
SN-02, #2 Wood Residue Fired Boiler

Steam Generation – Wood Residue Fired Boilers

SN-01 and SN-02 are similar 135 MMBTU/hr wood residue fired boilers. The boilers provide steam for the three lumber drying kilns, the ply-block heating vats, the three veneer dryers, the four hot presses, and the glue mixing area. Fuels combusted in the boilers include bark, wood waste, chip fines, plytrim, sawdust, glue residue, and used hydraulic and motor oil.

Plytrim, the scrap from the plywood trim saws, is the source of glue burned in the boilers. The plytrim generated averages 8% of the plywood produced and the glue averages 4.69 % of the weight of the plytrim. The facility generates approximately 625 tons of plytrim each week. The facility may ship up to 100% of the plytrim offsite to other facilities but needs to retain the capability to burn the permitted limit of the plytrim in its boilers if circumstances prevent shipment offsite. The plytrim burned onsite is conveyed to the fuel storage building by the dry waste handling system. The plytrim is mixed with other waste fuel by the random simultaneous adding of wood waste from several sources.

In the past on-specification used oil was mixed with wood waste and placed on the conveyor beltfeeding into the fuel storage building. It was further mixed in the same manner as the glue. At the present time liquid on-specification used oil is shipped offsite to an oil recycling facility. The only oil burned is from spills, leaks, and lubricating oil from conveyor chains. Sawdust that is used to absorb and clean up these sources is placed on the conveyor belt feeding into the fuel storage building. Estimation is the only way to quantify the oil in the sawdust used for clean up. Liquid on-specification used oil collected in barrels or other containers is quantified and records are kept onsite.

Each boiler is subject to PSD regulations and is equipped with a continuous emission monitoring system for measuring the oxygen content of the flue gases as an indicator of CO emissions. These monitors maintain the oxygen levels between 4.0% and 11.0% O_2. Each boiler is also subject to "Best Applicable Control Technology" (BACT). To meet this requirement each boiler is equipped with a multivane scrubber and primary and secondary dust collectors to control particulate matter.

The boilers are not subject to NSPS regulation Subpart Db--*Standards of Peformance for Industrial-Commercial-Institutional Steam Generating Units* since they were installed or last modified in 1979, before the Subpart's promulgation date of June 19, 1984.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation #19), and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
01	SO_2	3.0	13.1
02	SO_2	3.0	13.1

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

SN	Pollutant	lb/hr	tpy
01	PM	25.0	109.5
	PM_{10}	25.0	109.5
	VOC	10.0	43.8
	CO	200.0	876.0
	NO_X	28.5	124.8
02	PM	25.0	109.5
	PM_{10}	25.0	109.5
	VOC	10.0	43.8
	CO	200.0	876.0
	NO_X	28.5	124.8

3. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation #18), and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the total toxic emission rates at SN-01 and SN-02 set forth in the following table. [These HAPs are listed individually and are included in the total VOCs or PM/PM_{10} in the above table if applicable.]

Pollutant (Compounds)	Emission Rate (lb/hr)	Emission Rate (tpy)
Arsenic	0.2	0.2
Benzine	0.2	0.6
Cadmium	0.2	0.2
Chromium	0.2	0.2
Cobalt	0.2	0.2
Formaldehyde	0.2	1.0
Lead	0.2	1.0
Manganese	1.2	5.0
Phenol	0.2	0.2
POM	0.2	0.4

4. Pursuant to§19.503 and §19.901 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall measure the opacity of the gases discharged to the atmosphere from each wood residue fired boiler (SN-01 or SN-02) in accordance with EPA Reference Method 9 as found in 40 CFR Part 60, Appendix A. The opacity of the gases from either boiler shall not exceed 20% except as noted below.

   a. The opacity of the boilers may exceed 20%, up to a maximum of 40%, for no more than 135 minutes per day to allow for the raking of the boiler grates.

   b. The opacity of the boilers may exceed 20%, up to a maximum opacity of 40%, for a period not to exceed five hours following the startup of a boiler which has not been fired for eight or more hours.

5. Pursuant to §19.705 of Regulation #19, §18.1004 of Regulation #18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, , the permittee shall not exceed the following total quantities of fuel in SN-01 and SN-02 during any consecutive twelve month period.

   a. 262,800 tons of wood residue
   b. 46,248 gallons of "on specification" used hydraulic and motor oil
   c. 824 tons of glue residue

   These fuels shall be the only fuels burned in the SN-01 and SN-02 boilers.

6. Pursuant to §19.705 of Regulation #19, §18.1004 of Regulation #18, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly and annual records which demonstrate compliance with the limits listed in Specific Condition #5. A monthly report shall be prepared containing the individual records for each of the last twelve months and the total of the twelve months. The report

shall also contain the number of hours each boiler operates per month. The reports shall be updated within 15 days of the end of the month for which the data is being recorded. These records shall be kept on site and shall be made available to Department personnel upon request. A twelve consecutive month total and each month's data shall be submitted to the Department in accordance with General Provision #7, page 50.

7. Pursuant to §19.705 of Regulation #19, §18.1004 of Regulation #18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, the permittee shall not burn free liquids in the wood residue boilers. All free liquid "on-specification" used oils may be drummed and shipped to a recycling facility. All "on specification" used oils burned shall be throughly mixed with wood residue fuel. The permittee shall burn no more than 3.77 gallons of "on specification" used oil per hour per wood residue fired boiler nor more than .0853 tons of scrap glue per hour per boiler. The hourly rate shall be determined by dividing the weekly quantities of glue and "on specification used oil" burned by the week's hours of operation for each boiler. Glue residue shall include the glue in ply trim. The quantity of glue burned shall be determined by multiplying the tons of plytrim burned by the glue's percentage of plytrim weight.

8. Pursuant to §19.705 of Regulation #19, §18.1004 of Regulation #18, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain weekly records of the quantity and hourly rate of "on-specification" used oil and glue burned in the boilers. The average hourly rates shall be calculated per Specific Condition #7. These records shall be maintained and included with the records required in Specific Condition #6.

9. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not burn any hazardous material in the wood residue boilers. The permittee is responsible for ensuring that the residual materials burned in the boilers are not hazardous according to any present or future criteria.

10. Pursuant to §19.703 and §19.901 et seq of Regulation #19, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain on each boiler, SN-01 and SN-02, a continuous emissions monitor system (CEMS) for measuring the oxygen content of the boiler flue gas. These monitors shall maintain the flue gas oxygen level between 4.0% and 11.0% O_2. Alarms shall sound when the oxygen levels specified exceed either side of this range. The CEMS shall comply with the Division's "Continuous Emission Monitoring Systems Standards," the revision that is in effect on the date of issuance of this permit, a copy is provided in Appendix C.

11. Pursuant to §19.702 and §19.901 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall conduct biennial (once every two years) stack emissions tests on the two

wood residue fired boilers, SN-01 and SN-02, to measure the following pollutants by the indicated EPA test method as listed in 40 CFR Part 60, Appendix A. All tests shall be conducted when the equipment being tested is operating at least 90% of its rated capacity. Each boiler shall be tested individually. Testing shall be performed in accordance with Plantwide Condition #3, page 38 of this permit.

Pollutant	EPA Test Method
PM/PM_{10}	5
NO_X	7E
VOC	25A
Exhaust Gas Volumetric Flow Rate	2

SN-03, #1Veneer Dryer
SN-04, #2Veneer Dryer
SN-05, #3Veneer Dryer

Plywood Veneer Dryers

The wet plywood veneer is conveyed to one of three steam heated veneer dryers to reduce the moisture content. The drying process releases volatile organic compounds (VOCs) of which 95% are captured and ducted to an incinerator (SN-22). The incinerator is the BACT which was installed to control VOC emissions. The remaining 5% is released to the atmosphere through SN-03, SN-04, and SN-05.

Specific Conditions

12. Pursuant to §19.501 et seq and §19.901 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
03	PM	7.7	30.2
04	PM_{10}	7.7	30.2
05	VOC	16.9	66.1

13. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the total toxic emission rates at SN-03, SN-04, and SN-05 set forth in the following table. [These HAPs are listed individually and are included in the total VOCs or PM/PM_{10} in the above table if applicable.]

Pollutant (Compounds)	Emission Rate (lb/hr)	Emission Rate (tpy)
Acetone	0.1	0.3
Acetaldehyde	0.3	1.1
Formaldehyde	0.1	0.4
Methanol	0.3	1.1

14. Pursuant to§19.503 and §19.901 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not cause to be discharged to the atmosphere from the veneer dryers (SN-03, SN-04, and SN-05), gases 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.

SN-06, #1 Lumber Kiln
SN-07, #2 Lumber Kiln
SN-08, #3 Lumber Kiln

Lumber Drying Kilns

The Gurdon facility has three lumber drying kilns. The charge rate varies depending on the size of the product. The kilns are indirectly heated with steam produced by the wood residue boilers and heat recovery boiler. After drying, the lumber is removed from the kilns and placed in the cooling sheds. Green lumber from other facilities is received at the Gurdon facility for drying. Each kiln is vented to the atmosphere through twelve stacks.

Specific Conditions

15. Pursuant to §19.501 et seq and §19.901 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/charge	tpy
06	VOC	870.0	156.4
07	VOC	870.0	156.4
08	VOC	870.0	156.4

16. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the toxic emission rates at any one lumber drying kiln (SN-06, SN-07, or SN-08) set forth in the following table. [These HAPs are listed individually and are included in the total VOCs in the above table.]

Pollutant (Compounds)	Emission Rate per kiln	
	(lb/charge)	(tpy)
Acetone	5.8	1.0
Acetaldehyde	22.8	3.8
Formaldehyde	8.7	1.5
Methanol	22.8	3.8

17. Pursuant to §19.705 and §19.901 et seq of Regulation #19, §18.1004 of Regulation #18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 40 CFR §70.6, and 40 CFR Part 52 Subpart E, the permittee shall not exceed 48,000,000 board feet of lumber dried in any one drying kiln, SN-06, SN-07 or SN-08, during any consecutive twelve month period.

18. Pursuant to §19.705 and §19.901 et seq of Regulation #19, §18.1004 of Regulation #18, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly and annual production records for each drying kiln which demonstrate compliance with the limit listed in Specific Condition #17. A monthly report shall be prepared containing the individual records for each of the last twelve months and the total of the twelve months. These records shall be kept on site and shall be made available to Department personnel upon request. A twelve consecutive month total and each month's data shall be submitted to the Department in accordance with General Provision #7, page 50.

SN-10, Chip Fines Cyclone

Log and Scrap Chippers

The Chip Fines Cyclone controls the particulate matter emissions from the chip screens. Upon arrival at the mill logs are graded and low quality logs deemed unfit for plywood or lumber are sent to a chipper which fragments the logs into small pieces called chips. Scrap from the plyblock core milling operation and scrap veneer are chipped in their respective chippers. Scraps from the sawmill operations are also chipped in their respective chippers. The discharges from all chippers are conveyed to the chip screen. The chip screen is a machine that separates the chips into three categories, oversize chips, properly sized chip, and fines. The oversize chips are conveyed to a rechipper which reduces the size of the chips. The discharge from the rechipper is conveyed back to the chip screen. The proper sized chips are conveyed to storage for sale to paper mills. The fines are collected by a cyclone (SN-10) and finally delivered to the fuel storage building at the powerhouse.

Specific Conditions

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

SN	Pollutant	lb/hr	tpy
10	PM PM_{10}	2.0 2.0	8.8 8.8

20. Pursuant to §18.501 of Regulation #18, §19.901 et seq of Regulation #19, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause to be discharged to the atmosphere from the chip fines cyclone, gases which exhibit an opacity greater than 3%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60, Appendix A.

SN-11, Planer Shavings Cyclone

Lumber Finishing

Rough cut, dried lumber from the three lumber kilns (SN-06, SN-07, and SN-08) is moved to the Planer Mill for planing to finished dimensions. The shavings from the planer are collected by the Planer Shavings Cyclone/Baghouse (SN-11). The shavings are either transferred from the cyclone to a storage area for outside sales or transferred to the fuel storage building at the powerhouse.

Specific Conditions

21. Pursuant to §19.501 et seq and §19.901 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
11	PM PM_{10}	2.0 2.0	8.8 8.8

22. Pursuant to §18.501 of Regulation #18, §19.901 et seq of Regulation #19, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause to be discharged to the atmosphere from the planer shavings cyclone, gases which exhibit an opacity greater than 3%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60, Appendix A.

SN-12, Dry Wood Fuel Transfer Cyclone
SN-13, Dry Wood Fuel Truck Cyclone
SN-14, Dry Wood Fuel Cyclone (Powerhouse)

Dry Wood Fuel Handling

Damaged veneer from the veneer dryers, the veneer lay-up machines, the pre-presses, and the hot presses is transferred to the plywood waste hog. The plywood waste hog also receives trim scrap from the plywood finishing area. The plywood waste hog grinds the scrap to the desired size and delivers it to the Dry Wood Fuel Transfer cyclone (SN-12). The hogged fuel is conveyed from SN-12 to one of two possible locations. The fuel may be conveyed to a storage bin for truck load-out. The emissions from the truck loadout bin are controlled by the Dry Wood Fuel Truck Cyclone (SN-13). The alternate destination for hogged fuel is the fuel storage building at the powerhouse. Its emissions are controlled by the Powerhouse Dry Wood Fuel Cyclone (SN-14).

Specific Conditions

23. Pursuant to §19.501 et seq and §19.901 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
12	PM PM_{10}	2.0 2.0	8.8 8.8
13	PM PM_{10}	2.0 2.0	8.8 8.8
14	PM PM_{10}	2.0 2.0	8.8 8.8

24. Pursuant to §18.501 of Regulation #18, §19.901 et seq of Regulation #19, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause to be discharged to the atmosphere from any one of the Dry Wood Fuel cyclones, gases which exhibit an opacity greater than 3%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60, Appendix A.

SN-15, Sander dust Cyclone
SN-16, Sander dust Cyclone (Powerhouse)

Plywood Finishing

After the new plywood panels leave the hot presses, they are cooled and delivered to the Finishing Area. In this area the panels are trimmed and fed through a sander to smooth the panel surfaces. The sander dust is collected by the Sander Dust Cyclone/Baghouse (SN-15). The collected sander dust is delivered directly to a storage bin at the powerhouse. The PM/PM_{10} emissions from the sander dust at the powerhouse are controlled by Sander Dust Cyclone/Baghouse (SN-16).

Specific Conditions

25. Pursuant to §19.501 et seq and §19.901 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
15	PM PM_{10}	2.0 2.0	8.8 8.8
16	PM PM_{10}	2.0 2.0	8.8 8.8

26. Pursuant to §18.501 of Regulation #18, §19.901 et seq of Regulation #19, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause to be discharged to the atmosphere from any one of the Sander Dust cyclones, gases which exhibit an opacity greater than 3%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60, Appendix A.

27. Pursuant to §19.705 and §19.901 et seq of Regulation #19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 40 CFR 70.6, and 40 CFR Part 52 Subpart E, the permittee shall not exceed the production of 367,044,000 square feet of 3/8 equivalent plywood in the Finish Area during any consecutive twelve month period.

28. Pursuant to §19.705 and §19.901 et seq of Regulation #19, and 40 CFR Part 52 Subpart E, the permittee shall maintain monthly and annual production records which demonstrate compliance with the limit listed in Specific Condition #27. A monthly report shall be prepared containing the individual records for each of the last twelve months and the total of the twelve months. These records shall be kept on site and shall be made available to Department personnel upon request. A twelve consecutive month total and each month's data shall be submitted to the Department in accordance with General Provision #7, page 50.

SN-17, Press Fan #1
SN-18, Press Fan #2
SN-19, Press Fan #3
SN-20, Press Fan #4
SN-21, Press Fan #5

Plywood Hot Press Exhaust

After the plywood veneers are coated with glue and assembled into a panel the panel passes through a pre-press before entering one of four hot presses. The panels are held under pressure as steam is used to heat the presses and cure the glue. The presses are vented to the atmosphere by fans, SN-17 through SN-21.

Specific Conditions

29. Pursuant to §19.501 est seq and §19.901 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
17 18 19 20 21	PM PM_{10} VOC	1.3 1.3 6.3	4.5 4.5 22.0

30. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the total toxic emission rates at SN-17 through SN-21 set forth in the following table. [These HAPs are listed individually and are included in the total VOCs or PM/PM_{10} in the above table if applicable.]

Pollutant (Compounds)	Emission Rate (lb/hr)	Emission Rate (tpy)
Acetone	0.5	1.5
Acetaldehyde	0.4	1.4
Acrolin	0.1	0.3
Formaldehyde	0.4	1.1
Methanol	4.7	16.2
Phenol	0.2	0.3

31. Pursuant to §18.501 of Regulation #18, §19.901 et seq of Regulation #19, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause to be discharged to the atmosphere from any one of the hot press fans, gases 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.

SN-22, Veneer Dryer Incinerator and Heat Recovery Boiler

Steam Generation and VOC Incineration

In 1994 IP installed a natural gas-fired incinerator as the "Best Available Control Technology" (BACT) for VOC emissions from the veneer dryers. The first three stacks, stacks A, B, and C of each veneer dryer are connected to the incinerator. Approximately 95% of the dryer emissions are emitted from the first three stacks of each dryer. The incinerator destroys 95% of the VOCs entering it; thus, the system has an overall control efficiency of 90%. NO_X emissions from the incinerator are controlled by the use of a low NO_X 50 MM BTU/hr burner.

A heat recovery boiler is attached to the outlet of the incinerator. The heat recovery boiler uses hot exhaust from the veneer dryer incinerator to produce steam at a rate of 30,000 pounds saturated steam per hour. Additional steam production is available from the auxiliary low NO_X natural gas-burner. The auxiliary burner is used under maximum operating conditions and when one of the wood residue fired boilers is limited in production, not operational, or is shut down. The auxiliary burner has a capacity of 30,000 pounds of saturated steam per hour. The maximum firing capacity of the auxiliary burner is 55 MMBTU/hr. Emissions from the auxiliary burner are included with the veneer dryer incinerator.

The heat recovery boiler is subject to the New Source Performance Standards (NSPS) of 40 CFR Part 60, Subpart Dc--*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.*

Specific Conditions

32. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
22	PM_{10}	4.6	20.2
	SO_2	0.2	0.9
	CO	18.8	82.5

33. Pursuant to §19.501 et seq and §19.901 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
22	VOC NO_x	9.2 10.5	40.3 46.0

34. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the total toxic emission rates at SN-22 set forth in the following table. [These HAPs are listed individually and are included in the total VOCs in the above table if applicable.]

Pollutant (Compounds)	Emission Rate (lb/hr)	Emission Rate (tpy)
PM	4.6	20.2
Acetone	0.1	0.2
Formaldehyde	0.1	0.3

35. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause to be discharged to the atmosphere from the veneer dryer incinerator, gases 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.

36. Pursuant to §19.304 of Regulation #19 and 40 CFR 60 §40c(a), the heat recovery boiler is subject to the New Source Performance Standards (NSPS) of 40 CFR Part 60, Subpart Dc--*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.* Subpart Dc has been included in this permit as Appendix D.

37. Pursuant to §19.304 of Regulation #19 and 40 CFR 60.48c(g), NSPS Subpart Dc, the permittee shall maintain daily records of the quantity of natural gas consumed in the heat recovery boiler (SN-22). Pursuant to 40 CFR 60.48c(i) of NSPS Subpart Dc, IP shall maintain these records for a period of two years. These records shall be maintained on site and be made available to ADEQ personnel upon request.

38. Pursuant to §19.703 and §19.901 et seq of Regulation #19, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain on the incinerator, SN-22, a continuous emissions monitor system (CEMS) for measuring and recording the temperature and the flow rate of the gases leaving the combustion zone. The CEMS shall comply with the Division's "Continuous Emission Monitoring Systems Standards," the revision that is in effect on the date of issuance of this permit; a copy is provided in Appendix C.

39. Pursuant to §19.705 and §19.902 et seq of Regulation #19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 40 CFR 70.6, and 40 CFR Part 52 Subpart E, the veneer dryer incinerator shall be operated in a manner so that the temperature in the combustion zone remains at 1,500 °F or above, and the residence time shall be one second or longer.

40. Pursuant to §19.702 and §19.901 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall conduct biennial (once every two years) stack emissions tests on the veneer dryer incinerator/heat recovery boiler, SN-22, to measure the following pollutants by the indicated EPA test method as listed in 40 CFR Part 60, Appendix A. All tests shall be conducted when the equipment being tested is operating at least 90% of its rated capacity. Testing shall be performed in accordance with Plantwide Condition #3, page 38 of this permit.

Pollutant	EPA Test Method
NO_X	7E
CO	10
VOC	25A

SN-23, Log Sawing
SN-24, Debarking

Log Sawing and Debarking

Log processing for both, lumber and plywood production begins with the logs being cut to the proper lengths by the cutoff saws (SN-23A). Low quality logs are diverted to the fiber debarker (SN-24A) where the bark is removed prior to the logs being reduced to chips in the chipper. After the good quality logs are cut to the desired length, they are delivered to the ring debarkers (SN-24B) for bark removal. The debarked plyblocks are delivered to the veneer area. The debarked lumber logs are delivered to the sawmill (SN-23B) where the logs are ripped into green dimensional lumber.

Proposed Modifications

The Sawmill Modernization Project: The Gurdon Complex is proposing to modify the sawmill in the lumber operation. The objective is to reconfigure the sawmill (SN-23). This project will also require minor changes in the wood preparation area. There will be no increase in the permitted emission rates of SN-23. The modernization requires no additional equipment, only replacements and upgrades to existing equipment.

Specific Conditions

41. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
23	PM_{10}	9.9	13.2
24	PM_{10}	1.4	1.8

42. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
23	PM	9.9	13.2
24	PM	1.4	1.8

43. Pursuant to §19.503 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not cause to be discharged to the atmosphere from either the saws or the debarkers, gases

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.

44. Pursuant to §19.705 of Regulation #19, §18.1004 of Regulation #18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, the permittee shall not exceed 1,508,000 tons of logs processed at this facility during any consecutive twelve month period.

45. Pursuant to §19.705 of Regulation #19, §18.1004 of Regulation #18, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly and annual records which demonstrate compliance with the limit listed in Specific Condition #44. A monthly report shall be prepared containing the individual records for each of the last twelve months and the total of the twelve months. The reports shall be updated within 15 days of the end of the month for which the data is being recorded. These records shall be kept on site and shall be made available to Department personnel upon request. A twelve consecutive month total and each month's data shall be submitted to the Department in accordance with General Provision #7, page 50.

International Paper Company – Gurdon
Permit #: 463-AOP-R1
CSN: 10-0005

SN-25, By-Products Transfer Points (Fugitives)
SN-26, Plant Haul Roads (Fugitive)
SN-29, Sawdust & Fines Cyclone

Material Handling Fugitive Emissions

By-product handling includes conveyor transfer points, cyclones, and truck and rail car loading. Chippers, hogs, and screens are included as transfer points. By-products produced at the plant include bark, sawdust, planer shavings, sander dust, trim, and chips. Bark from the debarkers and sawdust from the log cutoff saws and the saw mill are transferred to the bark and sawdust conveyor. Screened and shredded material is sent to the powerhouse and fed onto the fuel feed chains or stored in the fuel storage building. If the fuel house is full, fuel is stored outside on a concrete pad. Excess bark and sawdust are loaded into trucks by a front-end loader.

The Gurdon Complex maintains miscellaneous operations that support lumber and plywood production. Operations in this area include road traffic. Logs, lumber, chips, plywood, landscape timbers, other value added to products, bark, sawdust, plytrim, and shavings are all shipped into or out of the plant by truck. To date, most of the plant roads have been paved and are now vacuumed for dust control. The two remaining sections of unpaved road are watered for dust control.

Proposed Modifications

The Sawdust Project: The Gurdon Complex is proposing the Sawdust Project that affects the by-product handling operation. Currently, sawdust generated at the mill is conveyed to a second conveyor moving bark from the wood preparation area. The sawdust and bark is then deposited onto the fuel handling conveyor to be conveyed to the wood fired boilers storage area or directly to the boilers. Wood chip fines from the chip screens are conveyed to a cyclone (SN-10) and then dropped onto the fuel-handling conveyor with the bark and sawdust. All three of these by-products are used as fuel for the wood fired boilers.

A market other than fuel has been developed for the sawdust from the sawmill and the chip fines from the chip screens. The Gurdon Complex is now proposing to install additional handling equipment to convey these by-products to a truck bin similar to the shavings truck bin (SN-11). New equipment includes a truck bin with cyclone (SN-29), blower with feeder, and duct work. A baghouse will not be used on the new cyclone because of the high moisture content of the sawdust and chip fines.

After the new equipment is in place, the sawdust will be conveyed to a blower feeder, then into the blower where it will be blown to the cyclone above the truck bin located near the chip truck bin. A diverter will be installed in the chip fines blower duct to divert the fines into the sawdust duct. This will enable the chip fines to be collected in the cyclone along with the sawdust. The existing

equipment will be left in place to be used should there be a slowdown in the market for the sawdust and fines.

By-Product Transfer Points: During the process of evaluating the production data for the proposed projects, it became apparent that some of the data used as the basis for emission estimates in the Title V permit application were in error. The annual chip production rates were too low. As a result, the annual PM/PM_{10} emission rate for SN-25 is being modified at this time.

Haul Road Fugitives: The haul road calculation is being revised to reflect the proposed Sawdust Project (increased traffic due to shipping the sawdust and fines offsite) and to reflect changes/corrections to the information submitted in the Title V application. A change in both the hourly and annual PM/PM_{10} emission rates are being requested at this time. This is based on the improvements in dust control (paving and vacuuming) at the facility, the additional truck traffic due to the sawdust & fines trucks, and the corrections to some of the production rates.

Specific Conditions

46. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
25	PM_{10}	2.2	3.3
26	PM_{10}	9.1	22.7
29	PM_{10}	2.0	8.8

47. Pursuant to §18.801 et seq of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
25	PM	2.2	3.3
26	PM	9.1	22.7
29	PM	2.0	8.8

48. Pursuant to §19.503 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not cause to be discharged to the atmosphere from any by-product handling operation or haul

roads, gases 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.

49. Pursuant to §19.503 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not cause to be discharged to the atmosphere from the sawdust & fines cyclone, gases 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.

50. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall conduct weekly observations of the opacity from the sawdust & fines cyclone and keep a record of these observations. If visible emissions are detected, then the permittee shall conduct a 6-minute opacity reading in accordance with EPA Reference Method 9. The results of these observations shall be kept on site and shall be made available to Department personnel upon request.

51. Pursuant to §19.705 of Regulation #19, §18.1004 of Regulation #18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, the permittee shall not exceed 1,508,000 tons of logs processed at this facility during any consecutive twelve month period.

52. Pursuant to §19.705 of Regulation #19, §18.1004 of Regulation #18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52 Subpart E, the permittee shall maintain monthly and annual records which demonstrate compliance with the limit listed in Specific Condition #51. A monthly report shall be prepared containing the individual records for each of the last twelve months and the total of the twelve months. The reports shall be updated within 15 days of the end of the month for which the data is being recorded. These records shall be kept on site and shall be made available to Department personnel upon request. A twelve consecutive month total and each month's data shall be submitted to the Department in accordance with General Provision #7, page 50.

SN-27, No. 12 Diesel Tank

Fuel Storage

The No. 12 Diesel Tank is a 12,000 gallon contractor's fuel storage tank used to refuel contractor equipment used on site. The tank is of horizontal cylindrical construction measuring 32 feet long by 8 feet in diameter. The tank was constructed in 1993 and therefore, it is subject to *NSPS Subpart Kb--Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.* A copy of Subpart Kb is enclosed in Appendix E.

Specific Conditions

53. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
27	VOC	0.6	0.1

54. Pursuant to §19.304 of Regulation #19 and 40 CFR §60.110b(a), NSPS Subpart Kb, the permittee shall maintain records showing the dimensions of the storage vessel and analysis showing the capacity for the life of the source. These records shall be maintained on site and be made available to ADEQ personnel upon request.

SN-28, Frosto/Tanner Gas (Fugitives)

Outside Air Line Antifreeze

IP has compressed air lines leading from the powerhouse to areas throughout the plant site. Air compressors are also located in individual departments to supplement air from the powerhouse. Compressed air lines are susceptible to water condensate entering or forming in the lines. Freezing weather will cause the condensate to freeze inside the lines and restrict the air flow. During the winter months IP meters a methanol based antifreeze material into the air lines to prevent the condensate from freezing. This material is released into the atmosphere at all outlets to the compressed air lines.

Specific Conditions

55. Pursuant to §19.501 et seq of Regulation #19 and 40 CFR Part 52 Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
28	VOC	8.2	11.8

56. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the total toxic emission rates at SN-28 set forth in the following table. [Methanol is listed individually and is included in the total VOC in the above table.]

Pollutant (Compounds)	Emission Rate (lb/hr)	Emission Rate (tpy)
Methanol	5.6	8.1

57. Pursuant to §19.705 of Regulation #19, §18.1004 of Regulation #18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, the permittee shall not use more than 1,728 gallons of antifreeze material during any consecutive twelve month period.

58. Pursuant to §19.705 of Regulation #19, §18.1004 of Regulation #18, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly and annual usage records which demonstrate compliance with the limit listed in Specific Condition #57. A monthly report shall be prepared containing the individual records for each of the last twelve months and the total of the twelve months. These records shall be kept on site and shall be made available to Department personnel upon request. A twelve consecutive month total and each month's data shall be submitted to the Department in accordance with General Provision #7, page 50.

SECTION V: COMPLIANCE PLAN AND SCHEDULE

International Paper Company -- Gurdon is in compliance with the applicable regulations cited in the permit application. International Paper -- Gurdon will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.

2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.

3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.

4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:

   a.Sampling ports adequate for applicable test methods
   b.Safe sampling platforms
   c.Safe access to sampling platforms
   d.Utilities for sampling and testing equipment

5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

Permit Shield:

7. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:

   a. The following have been specifically identified as applicable requirements based upon the information submitted by the permittee in an application dated September 16, 1996.

Source No.	Regulation	Description
Facility	Arkansas Regulation #19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation #26	Regulations of the Arkansas Operating Air Permits Program
Facility	40 CFR Part 60, Subpart A	New Source Performance Standards General Provisions
01, 02	40 CFR 52.21	Prevention of Significant Deterioration
03, 04, 05	40 CFR 52.21	Prevention of Significant Deterioration
06, 07, 08	40 CFR 52.21	Prevention of Significant Deterioration
10, 11	40 CFR 52.21	Prevention of Significant Deterioration
12, 13, 14	40 CFR 52.21	Prevention of Significant Deterioration
15, 16	40 CFR 52.21	Prevention of Significant Deterioration
17, 18, 19, 20, 21	40 CFR 52.21	Prevention of Significant Deterioration
22	40 CFR 52.21	Prevention of Significant Deterioration
22	40 CFR Part 60, Subpart Dc	Standards for Small Industrial-Commercial- Institutional Steam Generating Units
27	40 CFR Part 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984

   b. The following requirements have been specifically identified as not applicable based upon information submitted by the permittee in an application dated September 16, 1996.

Source No.	Regulation	Description	Basis for Determination
01, 02	40 CFR Part 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	Installed in 1979, before effective date of June 19, 1984

c. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

The liability of an owner or operator for any violation of applicable requirements prior to or at the time of issuance;

The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or

The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

Title VI Provisions:

8. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:

   a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.

   b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.

   c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.

   d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

9. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.

c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.

d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)

e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.

f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

10. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

11. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

    The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

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

SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated September 16, 1996, and October 13, 1999.

Loading Operations for bark, sawdust & fines, chips, dry trim, and shavings.

Tank No.	Content	Capacity (gal)	Vapor Pressure (psia @60 °F)	Insignificant Activities List
2	Unleaded Gasoline	1000	6.9	C(5)
4	Hydraulic Oil	5000	--	A(3)
5	10W Motor Oil	2000	--	A(3)
6	30W Motor Oil	2000	--	A(3)
7	Plyform Oil	5000	--	A(3)
8	Used Motor Oil	1000	--	A(3)
9	Used Hydraulic Oil	1000	--	A(3)
10	Diesel	250	.0074	A(3)
11	Hydraulic Oil	250	--	A(3)
13	Diesel	1000	.0074	A(3)
14	Hydrex AW68 Lubracant	550	--	A(3)

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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

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

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

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

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

6. Janitorial services and consumer use of janitorial products.

7. Internal combustion engines used for landscaping purposes.

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

9. Bathroom/toilet emissions.

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

11. Tobacco smoking rooms and areas.

12. Blacksmith forges.

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

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

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

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

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

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

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

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

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

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

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

23. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.

24. Drop hammers or presses for forging or metalworking.

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

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

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

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

26. Vents from continuous emissions monitors and other analyzers.

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

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

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

30. Consumer use of paper trimmers/binders.

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

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

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

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

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

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

37. Hydraulic and hydrostatic testing equipment.

38. Environmental chambers not using hazardous air pollutant gases.

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

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

41. Process water filtration systems and demineralizers.

42. Demineralized water tanks and demineralizer vents.

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

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

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

46. Ozone generators.

47. Fire suppression systems.

48. Emergency road flares.

49. Steam vents and safety relief valves.

50. Steam leaks.

51. Steam cleaning operations.

52. Steam and microwave sterilizers.

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

54. Miscellaneous additions or upgrades of instrumentation.

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

56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).

57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.

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

59. Residential wood heaters, cookstoves, or fireplaces.

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

61. Log wetting areas and log flumes.

62. Periodic use of pressurized air for cleanup.

63. Solid waste dumpsters.

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

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

66. Emissions from engine crankcase vents.

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

68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.

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

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

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

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

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

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

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

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

International Paper Company – Gurdon
Permit #: 463-AOP-R1
CSN: 10-0005

SECTION VIII: GENERAL PROVISIONS

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

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

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

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

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

    a. The date, place as defined in this permit, and time of sampling or measurements;
    b. The date(s) analyses were performed;
    c. The company or entity that performed the analyses;
    d. The analytical techniques or methods used;
    e. The results of such analyses; and
    f. The operating conditions existing at the time of sampling or measurement.

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

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

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

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the occurrence. The initial report may be made by telephone and shall include:

   a. The facility name and location,
   b. The process unit or emission source which is deviating from the permit limit,
   c. The permit limit, including the identification of pollutants, from which deviation occurs,
   d. The date and time the deviation started,
   e. The duration of the deviation,
   f. The average emissions during the deviation,
   g. The probable cause of such deviations,
   h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
   i. The name of the person submitting the report.

   A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by

initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

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

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

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

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

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

14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon

request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

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

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

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

    a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

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

APPENDIX A

Area Map

APPENDIX B

Plot Plan

APPENDIX C

Continuous Emission Monitoring Systems (CEMS) Conditions

APPENDIX D

NSPS Subpart Dc

APPENDIX E

NSPS Subpart Kb

INVOICE REQUEST FORM

PDS-_____

Date October 8, 2001

X	**Air**
	NPDES
	Stormwater
	State Permits Branch
	Solid Waste

CSN 10-0005

Facility Name International Paper Company

Invoice Mailing Address #1 IP Lane

Gurdon, Arkansas 71743

	Initial
X	**Modification**
	Annual

Permit Number 463-AOP-R1
Permit Description Title 5
Permit Fee Code A

Amount Due $ 500

Engineer Melissa Patangia

Paid? GNo GYes Check #_____

Comments: Air Permit Fee Calculation

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Pollution Control and Ecology gives the following notice:

International Paper Company (CSN: 10-0005) owns and operates a wood products on Highway 67 North near Gurdon, Arkansas. This permit is a minor modification to their initial Title V permit. Comments may only be made on changes. There will be an overall decrease in emissions as a result of this permitting action. The Gurdon Complex is proposing two projects – the Sawmill Modernization Project and the Sawdust Project.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp, Information Officer. Citizens desiring technical information concerning the application or permit should contact Melissa Patangia, Engineer. Both Rhonda Sharp and Melissa Patangia can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Clark County Library, 609 Caddo, Arkadelphia, Arkansas 71923. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission’s Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Randall Mathis
Director