

Idaho Timber Corporation of Carthage, LLC

Carthage, Arkansas 71725

AFIN: 20-00017

**Response to Comments on Draft Air Operating Permit
551-AOP-R2**

On or about May 2, 2007, the Director of the Arkansas Department of Environmental Quality gave notice of the draft permitting decision for the above referenced facility. During the comment period one interested person submitted written comments, data views, or arguments on the draft permitting decision. The Department's response to these issues and comments follows.

Comment 1:

Specific Condition 8, Page 12: Specific Condition 8 requires Idaho Timber to annually test SN-01 to verify the PM, PM₁₀, CO and NO_x emission rates listed in Specific Conditions 1 and 2. The current permit (R1 version) only requires annual testing of CO until two consecutive, successful stack tests, and then the testing frequency changes to a once every 5 year schedule.

In October 2006, Idaho Timber conducted stack testing on SN-01 for PM, PM₁₀, CO and NO_x. The stack test results indicated that the emission limits for NO_x and CO were exceeded; however, after further investigation, it was determined that the hourly emission limits were established using an incorrect heat input capacity of the boiler (originally estimated to be 35 MMBtu/hr). Had the emission limits been established using the correct heat input capacity of 64 MMBtu/hr, the emission limits for NO_x and CO would not have been exceeded.

Requiring Idaho Timber to annually test (until two consecutive stack tests have passed) for PM, PM₁₀, and NO_x in addition to CO places an unnecessary financial burden on the facility. Therefore, we request the condition be reworded similar to the previous permit to require only CO testing at SN-01.

Response:

The Department disagrees. The permit shall remain as written.

According to §19.702(B) a source is required to conduct stack sampling at the request of the Department. We feel that the testing requirements, as written, are reasonable and necessary considering the facts concerning this facility.

ADEQ OPERATING AIR PERMIT

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

Permit No. : 551-AOP-R2

Renewal #1

IS ISSUED TO:

Idaho Timber Company of Carthage, LLC

322 N. Main Street

Carthage, AR 71725

Dallas County

AFIN: 20-00017

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

November 30, 2005

AND

November 29, 2010

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

Signed:



Mike Bates
Chief, Air Division

July 5, 2007

Date Modified

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _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	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Idaho Timber Company of Carthage, LLC

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PERMIT NUMBER: 551-AOP-R2

FACILITY ADDRESS: 322 N. Main Street
Carthage, AR 71725

MAILING ADDRESS: P.O. Box 37
Carthage, Arkansas 71725

COUNTY: Dallas

CONTACT POSITION: Jack L. Beverage, Vice President

TELEPHONE NUMBER: (870) 254-2213

REVIEWING ENGINEER: Wesley Crouch

UTM North South (Y): Zone 15: 3370.8

UTM East West (X): Zone 15: 541.3

SECTION II: INTRODUCTION

Summary of Permit Activity

Idaho Timber Corporation operates lumber drying kilns and associated equipment at its Carthage facility located at 322 N. Main Street in Carthage, AR 71725. This modification will allow the facility to correct the permitted emission limits for the boiler based on current stack test data and to increase the annual production limit from 55 MMBF/yr to 65 MMBF/yr. The changes in the permitted emission rates are 26.6 tpy PM, 6.7 tpy PM₁₀, 4.8 tpy SO₂, 23.6 tpy VOC, 149.4 tpy CO and 17.1 tpy NO_x.

Process Description

This facility produces finished lumber from southern yellow pine. By-products of the operation include planer shavings and dry chips. Part of the shavings and chips will be used as fuel for the wood waste fired boiler with the balance being sold.

Yellow pine logs are delivered to the sawmill by truck. The logs are debarked, and then converted into rough green lumber. Green chips produced in the sawmill are loaded for transport to market. Green sawdust is conveyed to the boiler fuel house. Rough green lumber from the sawmill is sorted and stacked for drying in either of the two steam heated kilns (SN-03 and 04) or in the natural gas fired kiln (SN-05). The dry kilns are of the high temperature design and are equipped with a computerized control system that accurately monitors the drying rate and controls the kiln's heat demand.

Dried lumber from the kilns is taken to the planer mill where it is surfaced and trimmed before being packaged for shipment. Planer shavings are picked up at the planer in a pneumatic conveying system and conveyed to a cyclone collector (SN-02A). The collector also receives material that is pneumatically conveyed from the hog which processes dry trim material. Hogged dry trim and planer shavings are discharged from the collector into a high pressure pneumatic conveying system that transports the material to a cyclone collector (SN-02B) at the boiler fuel house.

The wood waste fired boiler (SN-01) burns bark, green sawdust, and a portion of the planer shavings and dry trim in order to produce steam for two of the three dry kilns. The boiler is equipped with a Dutch oven type furnace and uses a microprocessor based master controller to regulate the supply of fuel and air to the furnace.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999

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Regulations of the Arkansas Plan of Implementation for Air Pollution Control,
Regulation 19, effective May 28, 2006

Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective
September 26, 2002

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

Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	27.3	106.7
		PM ₁₀	22.8	86.9
		SO ₂	1.7	7.1
		VOC	49.7	125.0
		CO	55.3	242.6
		NO _x	13.0	57.0
HAPs		Acetaldehyde*	2.6	1.3
		Acrolein*	0.3	1.1
		Benzene*	0.3	1.2
		Chlorine	0.1	0.3
		Formaldehyde*	1.0	3.5
		Hydrogen Chloride	1.2	5.3
		Methanol*	2.8	6.9
		Phenol*	0.01	0.02
		Styrene*	0.2	0.6
		Arsenic	0.01	0.01
		Cadmium	0.01	0.01
		Chromium (hexavalent)	0.001	0.001
		Lead	0.01	0.02
		Manganese	0.1	0.5

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
01	Wood Waste Boiler	PM	18.2	79.8
		PM ₁₀	13.7	60.0
		SO ₂	1.6	7.0
		VOC	1.1	4.9
		CO	54.0	237.0
		NO _x	11.5	50.4
		Acrolein*	0.3	1.1
		Benzene*	0.3	1.2
		Chlorine	0.1	0.3
		Formaldehyde*	0.3	1.2
		Hydrogen Chloride	1.2	5.3
		Phenol*	0.01	0.02
		Styrene*	0.2	0.6
		Arsenic	0.01	0.01
		Cadmium	0.01	0.01
		Chromium (hexavalent)	0.001	0.001
		Lead	0.01	0.02
		Manganese	0.1	0.5
02A	Planer Mill Cyclone	PM	8.2	24.4
		PM ₁₀	8.2	24.4
02B	Planer Mill Cyclone	PM	0.7	2.0
		PM ₁₀	0.7	2.0
03	Drying Kiln #1	VOC	15.8	119.7**
		Acetaldehyde	1.2	
		Formaldehyde	0.1	
		Methanol	1.0	
04	Drying Kiln #2	VOC	15.8	
		Acetaldehyde*	1.2	
		Formaldehyde*	0.1	
		Methanol*	1.0	
05	Drying Kiln #3	VOC	17.1	
		Acetaldehyde*	0.2	
		Formaldehyde*	0.5	
		Methanol*	0.8	
05	Kiln #3 Natural Gas Emissions	PM	0.2	0.5
		PM ₁₀	0.2	0.5
		SO ₂	0.1	0.1
		VOC	0.1	0.4
		CO	1.3	5.6
		NO _x	1.5	6.6

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

**Total annual emissions from the kilns

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SECTION III: PERMIT HISTORY

Permit #551-A was issued to C & S Lumber Company on May 25, 1979. This was the first air permit issued for this facility.

Idaho Timber Corporation of Carthage, Inc. was issued a temporary permit (#551-AR-1) in July of 1993. This permit allowed the facility to refine operation of the equipment and to conduct emissions testing. A final permit (#551-AR-2) was issued to this facility on August 15, 1995.

Permit #551-AR-3 was issued on November 3, 1997. Under this permit, the facility decreased allowable throughput in order to remain a minor source with regards to Title V.

Permit 0551-AOP-R0 was issued on July 28, 2000. This was the first Title V permit issued to this facility. Under that permit, the facility was classified as a major source for Title V purposes due to VOC emissions in excess of 100 tons per year. The permitted increase in emissions resulted from an increase in production (from 50 MM board feet per year to 55 MM board feet per year) and the installation of a new natural gas fired lumber drying kiln.

Permit 551-AOP-R1 was issued on November 30, 2005. This was the first renewal of the Title V permit for this facility. HAP emissions from the drying kilns were quantified for the first time based on NCASI factors. No modifications or changes to the method of operation were made.

SECTION IV: SPECIFIC CONDITIONS

SN-01

Wood Waste Boiler

Source Description

This boiler is a wood waste fired boiler with a heat input capacity of approximately 64 MMBtu/hr. The boiler is used to supply steam to two of the three lumber drying kilns.

No add-on pollution control equipment is associated with this boiler.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 5, 6, and 8. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	13.7	60.0
SO ₂	1.6	7.0
VOC	1.1	4.9
CO	54.0	237.0
NO _x	11.5	50.4

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 5 and 6. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	18.2	79.8
Acrolein	0.3	1.1
Benzene	0.3	1.2
Chlorine	0.1	0.3

Formaldehyde	0.3	1.2
Hydrogen Chloride	1.2	5.3
Phenol	0.01	0.02
Styrene	0.2	0.6
Arsenic	0.01	0.01
Cadmium	0.01	0.01
Chromium (hexavalent)	0.001	0.001
Lead	0.01	0.02
Manganese	0.1	0.5

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. 8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
01	20%	Regulation 19, §19.503

4. Daily observations of the opacity from source SN-01 shall be conducted by a person trained, but not necessarily certified, in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the excess visible emissions. After corrective action has been taken, another observation of the opacity from the source in question shall be conducted in order to either confirm that excess visible emissions are no longer present or that the source is out of compliance with the permitted opacity limit. The permittee shall maintain records of all visible emissions observations, the cause of any excess visible emissions, the corrective action taken, and if excess visible emissions were present after corrective action was taken. These records shall be kept on-site and made available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]
5. Wood waste shall be the only fuel fired in the boiler. [Regulation 19, §19.705, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. The permittee shall not fire in excess of 204 tons of wood waste per day or 74,460 tons of wood waste in any consecutive twelve month period. [Regulation 19, §19.705, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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7. The permittee shall maintain daily records of the amount of wood waste fired in the boiler in order to demonstrate compliance with Specific Condition 6. Monthly totals and twelve-month rolling totals shall also be kept with these records and updated by the 15th day of the month following the month to which they pertain. Records shall be kept on-site and made available to Department personnel upon request. The monthly and twelve-month rolling totals shall be submitted to the Department in accordance with General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]
8. The permittee shall test source SN-01 annually to verify the PM, PM₁₀, CO and NO_x emission rates listed in Specific Conditions 1 and 2. Two back-to-back successful stack tests shall allow the facility to begin testing on a five-year schedule. If a failure should ever occur on that schedule, the facility shall revert back to the annual schedule until two successful back-to-back passed tests are achieved. These tests shall take place in accordance with the Plantwide Condition 3. [Regulation 19, §19.702 and 40 CFR Part 52, Subpart E]

SN-02A and SN-02B

Planer Mill

Source Description

The rough lumber is smoothed and trimmed in the planer mill. Sawdust and shavings from the planer mill are handled through the use of two cyclones which are integral to the facility's pneumatic conveying system. The cyclones are not considered add-on pollution control devices for the purpose of Compliance Assurance Monitoring (CAM).

Specific Conditions

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 13. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
02A	PM ₁₀	8.2	24.4
02B	PM ₁₀	0.7	2.0

10. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 13. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. 8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
02A	PM	8.2	24.4
02B	PM	0.7	2.0

11. The permittee shall not exceed 20% opacity from sources SN-02A and SN-02B as measured by EPA Reference Method 9. [Regulation 19, §19.503 and 40 CFR Part 52, Subpart E]
12. Daily observations of the opacity from sources SN-02A and SN-02B shall be conducted by a person trained, but not necessarily certified, in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the excess visible emissions. After corrective action has been taken, another observation of the opacity from the source in question shall be conducted in order to either confirm that excess visible emissions are no longer present or that the source is out of compliance with the permitted opacity limit. The permittee shall maintain records of all visible emissions observations, the cause of any excess visible emissions, the corrective action taken, and if excess visible emissions were present after corrective action was taken. These records shall be kept on-site and

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made available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

13. The permittee shall not operate the planer in the planer mill at a speed greater than 218 rpm. [Regulation 19, §19.705, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. The permittee shall install, calibrate, maintain, and operate a device to measure and record the speed of the planer at least daily of any day the planer mill operates in order to demonstrate compliance with Specific Condition 13. This information shall be kept on-site and made available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

SN-03, SN-04, and SN-05
 Lumber Drying Kilns

Source Description

Three kilns are used to dry the lumber. Sources SN-03 and SN-04 are heated with steam produced by the wood waste fired boiler. Source SN-05 is a natural gas fired kiln.

No control equipment is associated with any of the three kilns.

Specific Conditions

15. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 18. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
03	VOC	15.8	119.7
04	VOC	15.8	
05	VOC	17.1	
05*	PM ₁₀	0.2	0.5
	SO ₂	0.1	0.1
	VOC	0.1	0.4
	CO	1.3	5.6
	NO _x	1.5	6.6

* Natural gas combustion emissions contribution at SN-05

16. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 18. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
03	Acetaldehyde	1.2	1.3
	Formaldehyde	0.1	2.3
	Methanol	1.0	6.9
04	Acetaldehyde	1.2	
	Formaldehyde	0.1	
	Methanol	1.0	

05	Acetaldehyde	0.2	
	Formaldehyde	0.5	
	Methanol	0.8	
05*	PM	0.2	0.5

* Natural gas combustion emissions contribution at SN-05

17. The permittee shall not exceed 5% opacity from source SN-05 as measured by EPA Reference Method 9. Compliance shall be demonstrated through compliance with Specific Condition 20. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
18. The permittee shall not produce more than 65 MMBF (million board feet) of finished lumber per year at the facility. [Regulation 18, §18.1004, Regulation 19, §19.705, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
19. The permittee shall keep monthly records of lumber production. A twelve-month rolling total of total board feet shall be kept along with the monthly production records. Records shall be up dated by the 15th day of the month following the month to which the records pertain. Records shall be kept on-site, made available to Department personnel upon request and submitted in accordance with General Provision 7. [Regulation 18, §18.1004, Regulation 19, §19.705, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
20. Pipeline quality natural gas shall be the only fuel used at source SN-05. Because SN-05 is permitted to fire natural gas at annual capacity, no fuel records are required to be kept for the source. [Regulation 18, §18.1004, Regulation 19, §19.705, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Idaho Timber Company of Carthage, LLC will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - 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 shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated December 14, 2006.

Description	Category
No insignificant activities were listed in the application.	

SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective September 26, 2002]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 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 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 Regulation 26, §26.701(C)(3)(a)]

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

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

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The

permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

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

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

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

along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also

Idaho Timber Company of Carthage, LLC

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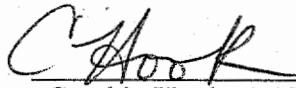
AFIN: 20-00017

submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]

- a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit;
 - e. and Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

CERTIFICATE OF SERVICE

I, Cynthia Hook, hereby certify that a copy of this permit has been mailed by first class mail to
Idaho Timber Corporation of Carthage, LLC, PO Box 37, Carthage, AR, 71725, on this
5th day of July, 2007.

A handwritten signature in cursive script, appearing to read 'C. Hook', written over a horizontal line.

Cynthia Hook, AAIL, Air Division