

# **ADEQ OPERATING AIR PERMIT**

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

**Permit No. : 592-AOP-R6**

**Renewal #1**

**IS ISSUED TO:**

**Deltic Timber Corporation - Ola Mill**

**Ola, AR 72853**

**Yell County**

**AFIN: 75-00009**

**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:**

**October 9, 2003    AND    October 8, 2008**

**IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.**

**Signed:**

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Mike Bates  
Chief, Air Division

May 08, 2007

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Date Modified

Facility: Deltic Timber Corporation - Ola Mill  
Permit No.: 592-AOP-R6  
AFIN: 75-00009

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**Table 1 - List of Acronyms**

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate matter
PM <sub>10</sub>	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO <sub>2</sub>	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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**Section I: FACILITY INFORMATION**

PERMITTEE: Deltic Timber Corporation - Ola Mill

AFIN: 75-00009

PERMIT NUMBER: 592-AOP-R6

FACILITY ADDRESS: Highway 10 East  
Ola, AR 72853

MAILING ADDRESS: PO Box 129  
Ola, AR 72853

COUNTY: Yell County

CONTACT POSITION: Brett Bray, Mill Manager

TELEPHONE NUMBER: 479-489-5223

REVIEWING ENGINEER: Charles Hurt

UTM Zone: 15

UTM North - South (Y): 3876.0 km

UTM East - West (X): 480.5 km

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## **Section II: INTRODUCTION**

### **Summary of Permit Activity**

Deltic Timber Corporation (Deltic) owns and operates an existing sawmill on Highway 10 East near Ola, Arkansas. Deltic submitted an application to incorporate requirements of the Manganese Health Based Compliance Alternative of 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, Institutional Boilers and Process Heaters*. Deltic did not propose any physical changes or changes to methods of operation at the Ola facility.

### **Process Description**

#### **SAWMILL**

Logs are delivered to the mill log yard where they are off-loaded and stored until needed by the mill. They are moved to the log decks by rubber-tired loaders, and they are mechanically conveyed through the debarking and sawing equipment. Pulp chips and sawdust produced in the sawing operation are loaded into trucks for transport to consumers. Rough, green lumber is sorted and stacked in packages and stored on the yard until loaded into the dry kilns. Lumber packages are moved from the stacker to storage and to the dry kilns by loaders.

#### **DRY KILNS**

The Ola Mill currently operates two direct-fired kilns (SN-04 and SN-05) and two steam-heated kilns (SN-06 and SN-12). The direct-fired kilns use suspension type wood waste burner systems. The metering bins that deliver wood fuel to the kilns are equipped with revolution counters, which are tracked with the facility's computer system.

#### **PLANER MILL**

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 collected by a pneumatic conveying system and delivered to a storage bin. The shavings are then either loaded into trucks for shipment to consumers or diverted to the fuel preparation system, which processes the material for use as fuel in the direct-fired kilns or boiler. The pneumatic conveying system also serves the dry trim hog.

#### **POWERHOUSE**

The Ola Mill currently operates one biogas-fired boiler designed to produce 40,000 pounds per hour of steam at 180 psig for use in the lumber drying kilns. The boiler is close-coupled to a biomass gassifier that consumes bark and green sawdust to produce biogas, which is fired in the boiler.

#### **MISCELLANEOUS ACTIVITIES**

The following miscellaneous operations are conducted as support for the Ola Mill:

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1. Maintenance activities such as welding and cutting for metal fabrication and repair and routine equipment and building up keep.
2. One motor oil storage tank, one saw oil storage tank, and 16 hydraulic fluid storage tanks.

Emissions associated with these activities are insignificant.

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### Regulations

The following table contains the regulations applicable to this permit.

**Table 2 – Regulations**

Source No.	Regulation Citations
Facility	Regulation 18, <i>Arkansas Air Pollution Control Code</i>
Facility	Regulation 19, <i>Regulations of the Arkansas Plan of Implementation for Air Pollution Control</i>
Facility	Regulation 26, <i>Regulations of the Arkansas Operating Air Permit Program</i>
13	40 CFR Part 60, Subpart Dc - <i>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units</i>
Facility*	40 CFR Part 63, Subpart DDDD – <i>National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products Manufacture</i>
Facility**	40 CFR Part 63, Subpart DDDDD – <i>National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters</i>

\* Initial Notification was the only applicable requirement for existing operations.

\*\* The direct fired kilns are not subject to Subpart DDDDD because the heat energy systems of direct fired kilns do not meet the definition of process heaters as defined in 40 CFR §63.7575.



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

**Table 3 – Emission Summary**

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
	Total Allowable Criteria Pollutant Emissions	PM	33.3	107.4	N/A
		PM <sub>10</sub>	22.2	74.5	
		SO <sub>2</sub>	2.0	8.6	
		VOC	80.3	318.3	
		CO	65.3	296.9	
		NO <sub>x</sub>	22.2	97.7	
	Total Allowable Non-Criteria Pollutant Emissions (included in VOC totals unless noted otherwise)	Acetaldehyde	0.64	2.94	N/A
		Acrolein	0.03	3.63	
		Cumene	0.03	0.02	
		Dibutyl Phthalate	0.03	0.02	
		Formaldehyde	0.94	4.35	
		HCl <sup>E</sup>	1.35	5.92	
		Hexane	0.06	0.27	
		Mercury <sup>D</sup>	0.02	0.02	
		Methanol	3.44	16.04	
		PAH	0.04	0.07	
		Phosphorus <sup>D</sup>	0.03	0.07	
		Trichloroethylene	0.03	0.02	
		TSM(excluding Mn) <sup>D, F</sup>	0.06	0.27	
		Arsenic	0.04	0.08	
		Beryllium	0.04	0.08	
		Cadmium	0.02	0.07	
		Chromium	0.04	0.08	
		Lead	0.04	0.08	
		Manganese	0.07	0.40	
		Nickel	0.02	0.07	
Selenium	0.02	0.07			
Total Allowable Air Contaminant Emissions <sup>C</sup>		Acetone	0.79	3.63	N/A
02	Sawmill Operations	PM	2.9	5.8	16
		PM <sub>10</sub>	1.7	3.3	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
04	Dry Kiln No. 1 (Direct Fired)	PM	2.2	20.3 <sup>A</sup>	17
		PM <sub>10</sub>	2.2	20.3 <sup>A</sup>	
		SO <sub>2</sub>	0.3	2.7 <sup>A</sup>	
		VOC	13.8	298.9 <sup>B</sup>	
		CO	18.4	172.1 <sup>A</sup>	
		NO <sub>X</sub>	2.1	18.9 <sup>A</sup>	
		Acetaldehyde	0.11	2.91 <sup>B</sup>	
		Acetone <sup>C</sup>	0.20	3.63 <sup>B</sup>	
		Acrolein	0.01	0.01 <sup>A</sup>	
		Arsenic	0.01	0.01 <sup>A</sup>	
		Beryllium	0.01	0.01 <sup>A</sup>	
		Chromium VI	0.01	0.01 <sup>A</sup>	
		Cumene	0.01	0.01 <sup>A</sup>	
		Dibutyl Phthalate	0.01	0.01 <sup>A</sup>	
		Formaldehyde	0.37	4.26 <sup>B</sup>	
		Hexane	0.01	0.07 <sup>A</sup>	
		Lead	0.01	0.01 <sup>A</sup>	
		Manganese	0.01	0.09 <sup>A</sup>	
		Mercury	0.01	0.01 <sup>A</sup>	
		Methanol	0.58	15.64 <sup>B</sup>	
		PAH	0.01	0.02 <sup>A</sup>	
		Phosphorus	0.01	0.02 <sup>A</sup>	
		Trichloroethylene	0.01	0.01 <sup>A</sup>	
05	Dry Kiln No. 2 (Direct Fired)	PM	2.2	20.3 <sup>A</sup>	17
		PM <sub>10</sub>	2.2	20.3 <sup>A</sup>	
		SO <sub>2</sub>	0.3	2.7 <sup>A</sup>	
		VOC	13.8	298.9 <sup>B</sup>	
		CO	18.4	172.1 <sup>A</sup>	
		NO <sub>X</sub>	2.1	18.9 <sup>A</sup>	
		Acetaldehyde	0.11	2.91 <sup>B</sup>	
		Acetone <sup>C</sup>	0.20	3.63 <sup>B</sup>	
		Acrolein	0.01	0.01 <sup>A</sup>	
		Arsenic	0.01	0.01 <sup>A</sup>	
		Beryllium	0.01	0.01 <sup>A</sup>	
		Chromium VI	0.01	0.01 <sup>A</sup>	
		Cumene	0.01	0.01 <sup>A</sup>	
		Dibutyl Phthalate	0.01	0.01 <sup>A</sup>	
		Formaldehyde	0.37	4.26 <sup>B</sup>	
		Hexane	0.01	0.07 <sup>A</sup>	
		Lead	0.01	0.01 <sup>A</sup>	
		Manganese	0.01	0.09 <sup>A</sup>	
		Mercury	0.01	0.01 <sup>A</sup>	
		Methanol	0.58	15.64 <sup>B</sup>	
		PAH	0.01	0.02 <sup>A</sup>	
		Phosphorus	0.01	0.02 <sup>A</sup>	
		Trichloroethylene	0.01	0.01 <sup>A</sup>	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
06	Dry Kiln No. 3 (Steam Heated)	VOC	16.8	298.9 <sup>B</sup>	20
		Acetaldehyde	0.19	2.91 <sup>B</sup>	
		Acetone <sup>C</sup>	0.18	3.63 <sup>B</sup>	
		Formaldehyde	0.08	4.26 <sup>B</sup>	
		Methanol	1.00	15.64 <sup>B</sup>	
11	Fuel Storage Cyclone	PM	2.7	11.8	21
		PM <sub>10</sub>	1.1	4.8	
12	Dry Kiln No. 4 (Steam Heated)	VOC	19.8	298.9 <sup>B</sup>	20
		Acetaldehyde	0.22	2.91 <sup>B</sup>	
		Acetone <sup>C</sup>	0.21	3.63 <sup>B</sup>	
		Formaldehyde	0.09	4.26 <sup>B</sup>	
		Methanol	1.19	15.64 <sup>B</sup>	
13	Bio-Gas Boiler with ESP 85% PM <sub>10</sub> removal (60.0 MMBTU/hr)	PM	4.8	21.0	23
		PM <sub>10</sub>	4.8	21.0	
		SO <sub>2</sub>	1.4	5.9	
		VOC	4.2	18.4	
		CO	28.5	124.8	
		NO <sub>x</sub>	18.0	78.8	
		Acetaldehyde	0.01	0.03	
		Acrolein	0.01	0.01	
		Cumene	0.01	0.01	
		Dibutyl Phthalate	0.01	0.01	
		Formaldehyde	0.03	0.09	
		HCl	1.35	5.92	
		Hexane	0.04	0.20	
		Mercury	8.00E-05	4.00E-04	
		Methanol	0.09	0.40	
		PAH	0.02	0.05	
		Phosphorus	0.01	0.05	
		Trichloroethylene	0.01	0.01	
		TSM(excluding Mn) <sup>D,F</sup>	0.06	0.27	
		Arsenic	0.02	0.07	
		Beryllium	0.02	0.07	
		Cadmium	0.02	0.07	
		Chromium	0.02	0.07	
		Lead	0.02	0.07	
		Manganese	0.07	0.31	
		Nickel	0.02	0.07	
		Selenium	0.02	0.07	
14	Shavings and Dry Trim Hog Cyclone	PM	4.4	19.1	21
		PM <sub>10</sub>	1.8	7.7	
15	Gasoline Storage Tank 2,000 gallon	VOC	11.9	1.0	30

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
16	Planermill Shavings Handling	PM PM <sub>10</sub>	14.1 8.4	29.4 17.4	31

<sup>A</sup> Total emissions for SN-04 and SN-05

<sup>B</sup> VOC, acetone, acetaldehyde, formaldehyde, and methanol annual totals for all kilns

<sup>C</sup> Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

<sup>D</sup> Included in PM/PM<sub>10</sub> total.

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

<sup>F</sup> TSM is defined as the combination of the eight metallic hazardous air pollutants, which are arsenic, beryllium, cadmium, chromium, lead, manganese, nickel, and selenium (40 CFR §63.7575).

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### **Section III: PERMIT HISTORY**

Operations at this facility began in 1971.

Permit #592-A was issued to this facility on January 25, 1980. The particulate matter being emitted from the kilns were the only emissions listed in this permit.

Permit #592-AR-1 was issued to Deltic Farm and Timber Co., Inc. on October 29, 1996. This permit allowed the facility to convert the #3 drying kiln from direct fire to steam heat, install a new drying kiln, and to install a new boiler. This permit classified this facility as a major source pursuant to 40 CFR 52.21 due to permitted VOC emissions in excess of 250 tons per year. Previously, this facility was considered a minor source for PSD purposes because the point source emissions of all criteria pollutants were below the thresholds and the fugitive emissions were not required to be counted for the purpose of determining PSD applicability.

Permit #592-AOP-R0, issued on October 28, 1998, was the first operating permit issued to Deltic Timber Corporation - Ola Mill. No physical modifications occurred with the issuance of this permit. Hazardous Air Pollutants (HAPs) were identified in this permit for the first time. This permit continued to classify this facility as a major source pursuant to 40 CFR §52.21 due to volatile organic compound (VOC) emissions in excess of 250 tpy.

Permit #592-AOP-R1 is the second permit issued on April 4, 1999 to Deltic Timber Corporation's Ola facility under Regulation 26. Under this permit, Deltic Timber replaced the shavings and dry trim cyclones with one larger, high efficiency cyclone in a closed loop system. Also, an existing planer and an existing trim saw (SN-08) were replaced with new ones. A new dry trim hog replaced a converted rock crusher (SN-10). As a result of these modifications, the permitted emissions of particulate matter decreased. Emissions of other pollutants were not affected by this modification.

Permit #592-AOP-R2 was issued October 9, 2003. The permit was the first Title V Renewal issued to the facility. The following modifications requested change the method of calculation for PM/PM<sub>10</sub> emissions at the sawmill operations (SN-02), change the method of calculation for PM/PM<sub>10</sub> emissions for sawdust handling operations (SN-03) and reclassify the operations as an insignificant activity, reduce the frequency of opacity observations on SN-04 and SN-05 from daily to weekly, remove testing requirements for PM<sub>10</sub> and NO<sub>x</sub> from sources SN-04, SN-05, and SN-13, remove CO testing for SN-04 and SN-05, reduce CO testing for SN-13 to once every five years; and update the emission factors for VOC and HAPs generated from combustion of wood waste at SN-04, SN-05, and SN-13. As a result of the modifications PM, PM<sub>10</sub>, VOC, and Non-Criteria Pollutants in tpy decreased by 13.0, 6.0, 154.5, and 43.37, respectively. SO<sub>2</sub>, CO, and NO<sub>x</sub> increased by 0.1, 6.8, and 0.7, respectively. No physical changes or changes in method of operations occurred.

Permit #592-AOP-R3 was issued on October 8, 2004. Deltic submitted two separate minor modification applications.

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#### Modification #1

Deltic requested to install two (2) 2,000 gallon horizontal storage tanks. One tank (SN-15) will be used to store gasoline, and the other will be used to store diesel fuel. The diesel storage tank is considered to be an insignificant activity under A-3. The increase in emissions due to installation of the gasoline storage tank was 11.9 lb/hr and 1.0 tpy of VOC.

#### Modification #2

Deltic requested to correct number rounding errors in the permit so the numbers match those reported in the emission rate tables, account for non-stack emissions from handling shavings from the planer mill (SN-16), correct the limits for Acetaldehyde, Acetone, Formaldehyde, and Methanol for the dry kilns in Plantwide Condition #11, and update the insignificant activities list to include a 100 gallon portable diesel fuel storage tank and shavings, chips sawdust storage piles. PM, PM<sub>10</sub>, VOC, Acetone, and Methanol permitted emissions increased by 22.5 tpy, 11.3 tpy, 0.1 tpy, 0.25 tpy, and 1.86 tpy, respectively. Acetaldehyde and Formaldehyde decreased by 7.70 tpy and 0.57 tpy, respectively.

Permit #592-AOP-R 4 was issued on May 5, 2005. Deltic requested clarification of Specific Condition #22 (d) so the condition did not imply the affected COMS unit must shut down during rake out periods. Deltic also requested authorization to combust in the boiler (SN-13) absorbent material that has been used to clean up incidental, on site oil spills. The absorbent material consists of wood chips, sawdust, and commercial products used to clean up oil spills. Permitted emissions were not increased because the absorbent material is less than 0.1% of the fuel throughput limit.

Permit #592-AOP-R5 was issued on May 22, 2006. Deltic requested the following modifications:

- Install new equipment and/or replace existing equipment used in the sawing operations (SN-02);
- Replace the heat energy systems for the two direct fired drying kilns (SN-04 and SN-05);
- Increase the lumber production limit from 125 MMBF/yr to 165 MMBF/yr; and
- Incorporate the requirements of CFR Part 63, Subpart DDDDD (Boiler MACT) for the existing wood fired boiler (SN-13).

At the sawmill, a new double length infeed and a drop sorter and stacker was installed. The edger and trim saw will be replaced with newer models, and the quad saw will be replaced with a band saw. Permitted emission limits for PM, PM<sub>10</sub>, SO<sub>2</sub>, VOC, CO, NO<sub>x</sub>, and HCl increased by 13.3 tpy, 11.9 tpy, 0.6 tpy, 72.4 tpy, 41.7 tpy, 4.6 tpy, and 23.7 tpy, respectively.

The emission increase for PM, PM<sub>10</sub>, VOC, and CO associated with the modification were large enough to trigger Prevention of Significant Deterioration (PSD) review.

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### BACT Determination Summary

Source Number	Description	BACT Determination	BACT Limit	Compliance Determination
SN-02	Sawmill Operations	Enclosed Building	0.014 lb PM/ton logs 0.008 lb PM <sub>10</sub> /ton logs	Record Keeping
SN-04	Dry Kiln No. 1	Good Combustion Practices	0.6 lb PM <sub>10</sub> /MBF	Record Keeping
			3.8 lb VOC/MBF	
			2.8 lb CO/MBF	
SN-05	Dry Kiln No. 2	Good Combustion Practices	0.6 lb PM <sub>10</sub> /MBF	Record Keeping
			3.8 lb VOC/MBF	
			2.8 lb CO/MBF	

## Section IV: SPECIFIC CONDITIONS

### SN-02

#### Sawmill Operations

##### Description

Logs are delivered to the mill log yard where they are off-loaded and stored until needed by the mill. They are moved to the log decks by rubber-tired loaders, and they are mechanically conveyed through the debarking and sawing equipment. Pulp chips and sawdust produced in the sawing operation are loaded into trucks for transport to consumers. Rough, green lumber is sorted and stacked in packages and stored on the yard until loaded into the dry kilns. Lumber packages are moved from the stacker to storage and to the dry kilns by loaders. The hourly limits were based upon the maximum capacity of the equipment.

##### Specific Conditions

1. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with the annual emission rates through compliance with Plantwide Condition #9. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 4 – Sawmill Operations Maximum Criteria Emission Rates**

Pollutant	lb/hr	tpy
PM <sub>10</sub>	1.7	3.3

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with the annual emission rates through compliance with Plantwide Condition #9. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 5 – Sawmill Operations Maximum Non-Criteria Emission Rates**

Pollutant	lb/hr	tpy
PM	2.9	5.8

3. The permittee shall comply with the following BACT determination for SN-02. Compliance with the emission limits set forth in the following table shall be demonstrated through compliance with Plantwide Condition #10 (recordkeeping) and maintaining the building enclosure. [Regulation No. 19 §19.901 *et seq.* effective December 3, 2004, and 40 CFR Part 52, Subpart E]

**Table 6 – Sawmill Operations BACT Limits**

BACT Determination	BACT Limit	Compliance Determination
Enclosed Building	0.014 lb PM/ton logs 0.008 lb PM <sub>10</sub> /ton logs	Recordkeeping



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## SN-04 and SN-05

### Direct Fired Drying Kilns No. 1 and No. 2

#### Description

The two direct fired kilns are heated with wood waste generated at this facility.

4. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with the annual emission rates through compliance with Plantwide Condition #9. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 7 – Dry Kilns No. 1 and No. 2 Maximum Criteria Emission Rates**

Source No.	Pollutant	lb/hr	tpy
04	PM <sub>10</sub>	2.2	-
	SO <sub>2</sub>	0.3	
	VOC	13.8	
	CO	18.4	
	NO <sub>x</sub>	2.1	
05	PM <sub>10</sub>	2.2	-
	SO <sub>2</sub>	0.3	
	VOC	13.8	
	CO	18.4	
	NO <sub>x</sub>	2.1	
Total Annual Emissions for SN-04 and SN-05	PM <sub>10</sub>	-	20.3
	SO <sub>2</sub>	-	2.7
	VOC	-	298.9 <sup>A</sup>
	CO	-	172.1
	NO <sub>x</sub>	-	18.9

<sup>A</sup> VOC total for all kilns

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with the annual emission rates through compliance with Plantwide Condition #9. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 8 – Dry Kilns No. 1 and No. 2 Non-Criteria Emission Rates**

Source No.	Pollutant	lb/hr	tpy
04	PM	2.2	-
	Acetaldehyde	0.11	
	Acetone	0.20	
	Acrolein	0.01	
	Arsenic	0.01	
	Beryllium	0.01	
	Chromium VI	0.01	
	Cumene	0.01	
	Dibutyl Phthalate	0.01	

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Source No.	Pollutant	lb/hr	tpy
05	Formaldehyde	0.37	-
	Hexane	0.01	
	Lead	0.01	
	Manganese	0.01	
	Mercury	0.01	
	Methanol	0.58	
	PAH	0.01	
	Phosphorus	0.01	
	Trichloroethylene	0.01	
	PM	2.2	
	Acetaldehyde	0.11	
	Acetone	0.20	
	Acrolein	0.01	
	Arsenic	0.01	
	Beryllium	0.01	
	Chromium VI	0.01	
	Cumene	0.01	
Total Annual Emissions for SN-04 and SN-05	Dibutyl Phthalate	0.01	15.3
	Formaldehyde	0.37	
	Hexane	0.01	
	Lead	0.01	
	Manganese	0.01	
	Mercury	0.01	
	Methanol	0.58	
	PAH	0.01	
	Phosphorus	0.01	
	Trichloroethylene	0.01	
	PM	-	
	Acetaldehyde	-	
	Acetone	-	
	Acrolein	-	
	Arsenic	-	
	Beryllium	-	
	Chromium VI	-	
	Cumene	-	
	Dibutyl Phthalate	-	
	Formaldehyde	-	
	Hexane	-	
	Lead	-	
	Manganese	-	
	Mercury	-	
	Methanol	-	
	PAH	-	
	Phosphorus	-	
	Trichloroethylene	-	

<sup>A</sup> Acetaldehyde, Acetone, Formaldehyde, and Methanol total for all kilns

- The permittee shall not exceed 20% opacity from sources SN-04 and SN-05 as measured by EPA Reference Method 9. [Regulation No. 19 §19.503 and 40 CFR Part 52, Subpart E]
- Weekly observations of the opacity from sources SN-04 and SN-05 shall be conducted by a person trained, but not necessarily certified, in EPA Reference Method 9. If visible

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emissions appear to be in excess of 20%, the permittee shall immediately take action to identify the cause of the excess visible emissions, implement corrective action, and document that visible emissions do not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records of any visible emissions which appeared to be in excess of the permitted opacity, the corrective action taken, and if visible emissions were present following the corrective action. These records shall be kept on site and made available to Department personnel upon request. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

8. Wood waste shall be the only fuel used to fire sources SN-04 and SN-05. [Regulation No. 19 §19.901 *et seq.* effective December 3, 2004, and 40 CFR Part 52, Subpart E]
9. The permittee shall comply with the following BACT determination for SN-04 and SN-05. Compliance with the emission limits set forth in the following table shall be demonstrated through compliance with Good Combustion Practices and record keeping (Plantwide Condition #9). [Regulation No. 19 §19.901 *et seq.* effective December 3, 2004, and 40 CFR Part 52, Subpart E]

Description	BACT Determination	BACT Limit	Compliance Demonstration
Direct Fired Kilns (SN-04 and SN-05)	Good Combustion Practices	0.6 lb PM <sub>10</sub> /MBF	Record Keeping
		3.8 lb VOC/MBF	
		2.8 lb CO/MBF	

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## SN-06 and SN-12

### Steam Heated Drying Kilns No. 3 and No. 4

#### Source Description

Permit #592-AR-1 allowed the permittee to convert source SN-06 to steam heat from direct fired. The modification began in the spring of 1998. Emissions from source SN-06, which are uncontrolled, will consist of volatile organic compounds. Currently, there are eight stacks associated with this kiln.

Source SN-12 was installed in late 1997. Emissions from this source, which are also uncontrolled, will consist of volatile organic compounds. Currently, there are six stacks associated with this kiln.

#### Specific Conditions

10. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with the annual emission rates through compliance with Plantwide Conditions #7, #8, #9, #10, and #11. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 9 – Dry Kilns No. 3 and No. 4 Maximum Criteria Emission Rates**

Source No.	Pollutant	lb/hr	tpy
06	VOC	16.8	298.9 <sup>A</sup>
12	VOC	19.8	

<sup>A</sup> VOC total for all kilns

11. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with the annual emission rates through compliance with Plantwide Conditions #7, #8, #9, #10, and #11. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 10 – Dry Kilns No. 3 and No. 4 Non-Criteria Emission Rates**

Source No.	Pollutant	lb/hr	tpy
06	Acetaldehyde	0.19	
	Acetone	0.18	
	Formaldehyde	0.08	
	Methanol	1.00	
12	Acetaldehyde	0.22	
	Acetone	0.21	
	Formaldehyde	0.09	
	Methanol	1.19	
Total Annual Emissions for SN-06 and SN-12	Acetaldehyde	-	2.91 <sup>A</sup>
	Acetone	-	3.63 <sup>A</sup>
	Formaldehyde	-	4.26 <sup>A</sup>
	Methanol	-	15.64 <sup>A</sup>

<sup>A</sup> Acetaldehyde, Acetone, Formaldehyde, and Methanol total for all kilns

## SN-11 and SN-14

### Fuel Storage Cyclone and Shavings and Dry Trim Hog Cyclone

#### Description

The dry kiln burner fuel storage cyclone has been designated as source SN-11. This cyclone is the part of the pneumatic conveying system that transports hogged planer shavings and dry trim from the fuel preparation system located adjacent to the shavings storage bin to the fuel storage bin that supplies fuel to the dry kiln burner systems. Material is conveyed in a 16" diameter line by approximately 6,980 cfm of ambient air.

The shavings and dry trim hog cyclone has been designated as source SN-14. This cyclone is part of a closed loop system which controls emissions generated by the trimming and shavings processes at this facility.

#### Specific Conditions

12. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with the annual emission rates through compliance with Plantwide Condition #9. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 11 – Fuel and Hog Cyclone Maximum Criteria Emission Rates**

Source No.	Pollutant	lb/hr	tpy
11	PM <sub>10</sub>	1.1	4.8
14	PM <sub>10</sub>	1.8	7.7

13. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with the annual emission rates through compliance with Plantwide Condition #9. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 12 – Fuel and Hog Cyclone Non-Criteria Emission Rates**

Source No.	Pollutant	lb/hr	tpy
11	PM	2.7	11.8
14	PM	4.4	19.1

14. The permittee shall not exceed 20% opacity from sources SN-11 and SN-14 as measured by EPA Reference Method 9. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. Weekly observations of the opacities from sources SN-11 and SN-14 shall be conducted by a person trained, but not necessarily certified, in EPA Reference Method 9. If any visible emissions are observed the permittee shall take immediate action to identify and correct the cause of the visible emissions. After corrective action has been taken, the permittee shall conduct another observation of the opacity from the source in question to confirm that visible emissions are no longer present. The permittee shall maintain records of all visible emissions observations and any corrective action taken. These records shall be kept on site and shall be

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made available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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### SN-13

#### Bio-Gas Boiler

#### Description

Heat is supplied to the steam-heated kilns through the use of a bio-gas fired boiler. The boiler is close coupled to a biomass gassifier that is fired with wood waste. The gassifier, in turn, produces the bio-gas which is used to fire the boiler. The rated capacity of this equipment is 60.0 MMBTU/hr. Emissions from this source are controlled through the use of a multi-cyclone and an electrostatic precipitator.

#### Specific Conditions

16. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with the annual emission rates through compliance with Specific Condition #18. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 13 – Bio-Gas Boiler Maximum Criteria Emission Rates**

Source No.	Pollutant	lb/hr	tpy
13	PM <sub>10</sub>	4.8	21.0
	SO <sub>2</sub>	1.4	5.9
	VOC	4.2	18.4
	CO	28.5	124.8
	NO <sub>x</sub>	18.0	78.8

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

**Table 14 – Bio-Gas Boiler Non-Criteria Emission Rates**

Source No.	Pollutant	lb/hr	tpy
13	Acetaldehyde	0.01	0.03
	Acrolein	0.01	0.01
	Cumene	0.01	0.01
	Dibutyl Phthalate	0.01	0.01
	Formaldehyde	0.03	0.09
	HCl	0.90	3.95
	Hexane	0.04	0.20
	Mercury	8.00E-05	4.00E-04
	Methanol	0.09	0.40
	PAH	0.02	0.05
	Phosphorus	0.01	0.05
	Trichloroethylene	0.01	0.01

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Source No.	Pollutant	lb/hr	tpy
13	TSM(excluding Mn)	0.06	0.27
	Arsenic	0.02	0.07
	Beryllium	0.02	0.07
	Cadmium	0.02	0.07
	Chromium	0.02	0.07
	Lead	0.02	0.07
	Manganese	0.07	0.31
	Nickel	0.02	0.07
	Selenium	0.02	0.07

18. The permittee shall not fire in excess of 58,400 tons of wood waste in any consecutive twelve month period at source SN-13. The permittee may also combust small amounts of absorbent material used to clean up incidental, onsite oil spills. Absorbent material shall consist only of sawdust, wood chips, or commercially sold products made specifically for absorbing oil spills. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
19. The permittee shall maintain monthly records that demonstrate compliance with the limits set in Specific Condition #18 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's total wood waste combusted at SN-13 shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]
20. The permittee shall test SN-13 while operating at least at 90% capacity once every five years for carbon monoxide using EPA Reference Method 10. The tests shall be conducted in accordance with Plantwide Condition #3. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]

### NSPS Requirements

21. SN-13 is subject to and shall comply with applicable provisions of 40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* (Appendix A). Applicable provisions of Subpart Dc include, but are not limited to, the following: [Regulation No. 19 §19.304 and 40 CFR §60.40c]
  - a. The permittee shall not discharge to the atmosphere any gases from SN-13 that contain particulate matter in excess of 0.10 lb/ MMBTU. [Regulation No. 19 §19.304 and 40 CFR 60.43c(b)(1)]
  - b. The permittee shall not exceed 20% opacity from source SN-13 as measured by EPA Reference Method 9 except for one 6-minute period per hour of not more than 27%. [Regulation No. 19 §19.304 and 40 CFR 60.43c(c)]
  - c. The particulate matter and opacity standards apply at all times, except during periods of startup, shutdown, or malfunctions. [Regulation No. 19 §19.304 and 40 CFR 60.43c(d)]



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- d. The permittee shall install, calibrate, maintain, and operate a COMS for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system. The records shall be maintained onsite for at least two years and made available to Department personnel upon request. [Regulation No. 19 §19.304, 40 CFR 60.47c(a), and 40 CFR 60.48c(i)]
- e. The COMS shall be operated in accordance with the applicable procedures under Performance Specification 1 (Appendix B to Part 60 – *Performance Specifications*). Compliance or non-compliance with the specifications set forth in Appendix B of 40 CFR Part 60 does not necessarily constitute compliance or non-compliance with the Department’s CEMS standards. [Regulation No. 19 §19.304 and 40 CFR 60.47c(b)]
- f. The permittee shall record any exceedances in opacity and submit excess emission reports for any excess emissions. The records shall be kept on site for at least two years. A report shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.304, 40 CFR 60.48c(c), and 40 CFR 60.48c(j)]
- g. The permittee shall maintain daily records of the wood residue combusted in SN-13. These records shall be kept on site for at least two years and made available to Department personnel upon request. [Regulation No. 19 §19.304, 40 CFR 60.48c(g), and 40 CFR 60.48c(i)]

### **Boiler MACT Requirements**

- 22. SN-13 is subject to and shall comply with applicable provisions of 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters* (Appendix B). Due to its construction date, size, and fuel combusted, SN-13 is an existing boiler included in the Large Solid Fuel Subcategory. Applicable provisions of Subpart DDDDD include, but are not limited to, the following: [Regulation No. 19 §19.304 and 40 CFR §60.40c]
  - a. The permittee shall not discharge to the atmosphere any gases from SN-13 that contain the following pollutants in excess of the specified limits. [Regulation No. 19 §19.304 and 40 CFR §63.7500]

**Table 15 – Boiler MACT Emission Standards**

<b>Pollutant</b>	<b>Emission Limit lb / MMBTU</b>
PM or TSM*	0.07 or 0.001
Mercury (Hg)	$9.0 \times 10^{-6}$
HCl	0.09

\* TSM is defined as the combination of the eight metallic hazardous air pollutants, which are arsenic, beryllium, cadmium, chromium, lead, manganese, nickel, and selenium (40 CFR §63.7575).

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- b. The permittee shall demonstrate initial compliance no later than 180 days after September 13, 2007. [Regulation No. 19 §19.304 and 40 CFR §63.7510(d)]
- c. If the permittee elects to demonstrate initial compliance with any of the limits in Specific Condition #22(a) through performance testing, then the permittee shall:
  - i. conduct performance tests according to §63.7520 and Tables 5 and 7 of Subpart DDDDD, [Regulation No. 19 §19.304 and 40 CFR §63.7530(a)]
  - ii. conduct a fuel analysis according to §63.7521, and [Regulation No. 19 §19.304 and 40 CFR §63.7530(c)]
  - iii. establish maximum fuel pollutant input levels, as applicable. [Regulation No. 19 §19.304 and 40 CFR §63.7530(c)]
- d. If the permittee elects to demonstrate initial compliance with any of the limits in Specific Condition #22(a) through fuel analysis, then the permittee shall:
  - i. conduct a fuel analysis according to §63.7521 Tables 6 and 8 of Subpart DDDDD and [Regulation No. 19 §19.304 and 40 CFR §63.7530(a)]
  - ii. determine emission rates and establish operating limits according to §63.7530(d), as applicable. [Regulation No. 19 §19.304 and 40 CFR §63.7530(a)]
- e. In order to demonstrate continuous compliance with Specific Condition #22(a), the permittee shall keep records of the type and amount of fuel combusted during the reporting period to demonstrate all fuel types and fuel mixtures combusted would either result in lower emissions of TSM, HCl, and mercury, than the applicable emission limit for each pollutant (compliance through fuel analysis), or result in lower fuel input of TSM, chlorine, and mercury than the maximum values calculated during the previous performance test (compliance through performance testing). [Regulation No. 19 §19.304 and 40 CFR §63.7540]
- f. If compliance for any limit in Specific Condition #22(a) is demonstrated through performance testing, the permittee shall conduct subsequent performance tests on an annual basis, between the 10<sup>th</sup> and 12<sup>th</sup> month from the previous test. The permittee may conduct performance testing on a less frequent basis as long as the following requirements are met: [Regulation No. 19 §19.304 and 40 CFR §63.7515(a)]
  - i. After three consecutive years demonstrate that the permittee complies with any limit in Specific Condition #22(a), the permittee can conduct performance testing every third year such that the next performance test occurs no later than 36 months after the previous performance test. [Regulation 19 §19.304 and 40 CFR §63.7515(b)]

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- ii. If a performance test shows noncompliance for any limit in Specific Condition 22(a), the permittee must conduct performance testing annually for that pollutant until three consecutive performance tests demonstrate compliance with the Boiler MACT emission limit. [Regulation No. 19 §19.304 and 40 CFR §63.7515(d)]
  - g. If compliance for any limit in Specific Condition #22(a) is demonstrated through fuel analysis, the permittee shall conduct subsequent fuel analyses no later than 5 years from the previous analysis. [Regulation No. 19 §19.304 and 40 CFR §63.7515(f)]
  - h. The permittee shall submit an application which includes a fuel analysis and/or performance testing results and obtain a revised permit which allows combustion of a new fuel prior to combusting the new fuel. [Regulation No. 19 §19.304 and 40 CFR §63.7515]
  - i. The permittee shall report the results of performance tests and fuel analyses within 60 days after the completion of the performance tests or fuel analyses. In addition to the information required in §63.7550, these reports shall also verify that operating limits have not changed or provide documentation of revised operating parameters established according to §63.7530 and Table 7 of Subpart DDDDD. [Regulation No. 19 §19.304 and 40 CFR §63.7515(g)]
  - j. The permittee shall develop and implement a Startup, Shutdown, Malfunction (SSM) Plan according to the provisions in 40 CFR §63.6(e)(3) or obtain a variance from the US EPA Region VI. [Regulation No. 19 §19.304 and 40 CFR §63.7505]
  - k. The permittee shall submit all applicable notifications by the dates specified in 40 CFR §63.7545. [Regulation No. 19 §19.304 and 40 CFR §63.7515]
  - l. The permittee shall submit a compliance report semiannually. The first compliance report shall be postmarked or delivered no later than July 31, 2008, and it shall cover the reporting period between September 13, 2007 and June 30, 2008. Each report thereafter shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. [Regulation No. 19 §19.304 and 40 CFR §63.7550]
  - m. The permittee shall maintain records in accordance with 40 CFR §63.7555. These records shall be kept on site and made available to Department personnel upon request. [Regulation No. 19 §19.304 and 40 CFR §63.7555]
- 23. The permittee shall operate and maintain SN-13 and all associated emission control devices according to the parameters used to define the most recent, technically sound HBCA meeting the requirements of Appendix A of 40 CFR Part 63, Subpart DDDDD.

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These parameters include, but are not limited to, the following: [Appendix A of 40 CFR Part 63, Subpart DDDDD]

- a. Wood waste and small amounts of oil soaked absorbent material used to clean up incidental, onsite oil spills shall be the only fuel type combusted at SN-13;
  - b. The maximum heat input shall not exceed 60 MMBTU/hr;
  - c. The hourly emission rate for manganese shall not exceed 0.07 lb Mn/hr;
  - d. The maximum manganese fuel content shall not exceed 0.017 lb Mn/MMBTU;
  - e. The minimum distance to the nearest fence line shall be no less than 184 meters;
  - f. The stack following the final control device shall be 18 m tall; and
24. The permittee shall update and resubmit the eligibility demonstration if any of the parameters used to define SN-13 as a source eligible HBCA changes in such a way that results in increase HAP emission and/or increased risk from exposure to emissions.
  25. Prior to making changes to any of the parameters listed in Specific Condition #23, the permittee shall update and resubmit the eligibility demonstration and receive verification from the EPA and ADEQ that the updated demonstration is technically sound and meets the requirements of Appendix A to 40 CFR Part 63, Subpart DDDDD.
  26. The permittee shall maintain records of the information used in developing the eligibility demonstration, including the information specified in section 8 of Appendix A, 40 CFR Part 63, Subpart DDDDD.
  27. The permittee shall perform stack testing for Manganese in accordance with Plantwide Condition #3 and Table 5 to Subpart DDDDD to demonstrate compliance with the limit specified in Specific Condition #23 (c). The testing shall be performed while SN-13 is operating at or above 90% maximum rated capacity. Testing shall be conducted every five years after the previous test. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart DDDDD]

### **CAM Requirements**

28. Bio-Gas Boiler (SN-13) is subject to Compliance Assurance Monitoring and shall comply with all applicable provisions, including but not limited to: [Regulation No. 19 §19.703, 40 CFR Part 52 Subpart E, and Part §64.6]
  - a. The permittee shall maintain a COM at a location such that its readings are representative of the stack exhaust opacity. [Regulation No. 19 §19.703, 40 CFR Part 52 Subpart E, and 40 CFR Part §64.6(c)(1)]
  - b. The permittee shall maintain the indicator range on the COM to make readings of

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opacities between 0% and 100%. [Regulation No. 19 §19.703, 40 CFR Part 52 Subpart E, and 40 CFR Part §64.6(c)(1)]

- c. The permittee shall maintain a data acquisition system that completes a minimum of one cycle of opacity sampling and analyzing for each successive 10 second period. The data shall be used to determine six-minute average opacity readings from the COM. An alarm (visible and/or audible) shall be triggered when a six minute reading is over 20%. If more than one six minute reading exceeds the opacity limit in a one hour period the permittee shall take immediate corrective action. The results of six minute readings shall be reduced to 24-hour block averages. Records of 24-hour averages as well as any one hour period requiring corrective action shall be kept onsite, updated daily, and made available to Department personnel upon request. [Regulation No. 19 §19.703, 40 CFR Part 52 Subpart E, and 40 CFR Part §64.6(c)(1)]
- d. The “rake-out” period shall be noted on the operator’s log and shall not be used to monitor compliance, nor to determine compliance with CAM requirements. [Regulation No. 19 § 19.703, 40 CFR Part 52 Subpart E, and 40 CFR Part §64.6(c)(3)]
- e. The rake-out period is to be scheduled for the same specific time each day and shall be recorded. The Department shall be notified in advance and in writing of the schedule or any changes. The process of soot blowing, grate cleaning, ash raking, and refiring or any part thereof is considered one activity, and the time limit on this activity is 45 minutes. This activity shall not be performed more than once in any consecutive 8 hour period, and it shall not be performed more than three times in any consecutive 24 hour period. [Regulation No. 18 §18.501(A)(4)]

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## SN-15

### Gasoline Storage Tank

#### Description

SN-15 is a 2,000 gallon horizontal, above ground storage tank used to store gasoline.

#### Specific Conditions

29. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with the annual emission rates through compliance with Specific Condition #30. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 16 – Gasoline Storage Tank Maximum Criteria Emission Rates**

Pollutant	lb/hr	tpy
VOC	11.9	1.0

30. The permittee shall not exceed an annual throughput of 135,000 gallons of gasoline from SN-15 in any 12-month rolling period, and gasoline shall be the only fuel stored in SN-15. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
31. The permittee shall maintain records that demonstrate compliance with the annual limit. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's gasoline throughput data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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## SN-16

### Planermill Shavings Handling

#### Description

Planer shavings are collected by a pneumatic conveying system and delivered to a storage bin. The shavings are then either loaded into trucks for shipment to consumers or diverted to the fuel preparation system, which processes the material for use as fuel in the direct-fired kilns or boiler. The pneumatic conveying system also serves the dry trim hog.

#### Specific Conditions

32. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with the annual emission rates through compliance with Plantwide Condition #9. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 17 – Planermill Shavings Handling Maximum Criteria Emission Rates**

Pollutant	lb/hr	tpy
PM <sub>10</sub>	8.4	17.4

33. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with the annual emission rates through compliance with Plantwide Condition #9. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 18 – Planermill Shavings Handling Maximum Non-Criteria Emission Rates**

Pollutant	lb/hr	tpy
PM	14.1	29.4

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

Deltic Timber Corporation - Ola Mill 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: PLANT WIDE CONDITIONS**

1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No. 19 §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No. 19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation No. 19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by 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 will maintain the equipment in good condition at all times. [Regulation No. 19 §19.303 and A.C.A. §8-4-203 as referenced by 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 No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
7. The permittee shall not emit in excess of 298.9 tons of volatile organic compounds in any consecutive twelve month period from the four drying kilns located at this facility. Compliance with this condition will be determined through compliance with Plantwide

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Condition #9. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

8. Pine shall be the only wood processed through the lumber kilns at this facility. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6]
9. The permittee shall not produce in excess of 165.0 million board feet in any consecutive twelve month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6]
10. The permittee shall maintain records of the board feet of lumber processed in order to demonstrate compliance with Plantwide Condition #9 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the fifteenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]
11. The permittee shall not exceed the following non-criteria pollutant emission rates from all kilns at this facility in any consecutive twelve month period. Compliance with this condition will be determined through compliance with Plantwide Condition #9. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 19 – Total Kiln Maximum Annual Non-Criteria Pollutant Emission Rates**

<b>Source No.</b>	<b>Tons per consecutive 12 months</b>
Acetaldehyde	2.91
Acetone	3.63
Formaldehyde	4.26
Methanol	15.64

12. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation No. 18 §18.801]
13. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants from becoming airborne. [Regulation No. 18 §18.901]

#### **Title VI Provisions**

14. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]

- a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
15. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
16. 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.
17. 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.

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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.

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

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## Section VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated **10/12/2005**.

**Table 20 - Insignificant Activities**

<b>Description</b>	<b>Category</b>
550 Gallon Motor Oil Tank	Group A, #3
550 Gallon Hydraulic Oil Tank	Group A, #3
Debarking Operations	Group A, #13
Chipper Cyclone	Group A, #13
Shavings Bin	Group A, #13
Bark Hog	Group A, #13
Sawdust Handling Operations	Group A, #13
Fuel/Bark Storage Piles	Group A, #13
Log Yard	Group A, #13
2,000 gallon Diesel Fuel Storage Tank	Group A, #3
100 gallon Portable Diesel Fuel Storage Tank	Group A, #3
Shavings/Chips/Sawdust Storage Piles	Group A, #13
Spray Paint Activities	Group A, #13

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

### Section VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.[40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective 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 No. 26 §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and

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

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

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

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- viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
- ix. The name of the person submitting the report.

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

- b. For all deviations, the permittee will report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a. above. The semi-annual report must include all the information as required in the initial and full report required in 8a. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]
- 9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]
  - 10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]
  - 11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]
  - 12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]



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13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]
14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]
17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]
  - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;

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- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
- 21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The compliance status;
  - c. Whether compliance was continuous or intermittent;
  - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
  - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
- 22. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,
  - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
- 23. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]