

# ADEQ OPERATING AIR PERMIT

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

Permit #: 703-AOP-R0

IS ISSUED TO:

Georgia - Pacific Corporation - El Dorado Sawmill  
Highway 167 South  
5482 Junction City Hwy  
El Dorado, AR 71730  
Union County  
CSN: 70-0032

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

and

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Keith A. Michaels

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Date

## **SECTION I: FACILITY INFORMATION**

PERMITTEE:	Georgia - Pacific Corporation - El Dorado Sawmill
CSN:	70-0032
PERMIT NUMBER:	703-AOP-R0
FACILITY ADDRESS:	Highway 167 South 5482 Junction City Hwy El Dorado, AR 71730
COUNTY:	Union
CONTACT POSITION:	Mr. Robert Hanry
TELEPHONE NUMBER:	(501) 863-4182
REVIEWING ENGINEER:	Derrick Brown
UTM North-South (X):	3,666,000
UTM East-West (Y):	534,000

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## **SECTION II: INTRODUCTION**

Georgia - Pacific Corporation (G-P), currently operates a lumber sawmill near El Dorado (Union County), Arkansas. The facility operates under Standard Industrial Classification Code (SIC) Number 2421 (i.e., softwood rough and dressed lumber chips). This is the initial Title V permit for the facility. The changes in emissions from the facility's last permit come from revised emission factors and the inclusion of fugitive emissions. There are no changes in the method of operation with the issuance of this permit.

### **Regulations**

Georgia - Pacific Corporation is subject to regulation under the *Arkansas Air Pollution Control Code* (Regulation 18), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulations of the Arkansas Operating Air Permit Program* (Regulation 26). The El Dorado Sawmill is an existing major source since it has the potential to emit more than 250 tons per year (tpy) of at least one regulated air pollutant. As a major source in an attainment region, modifications made at the facility that result in a "significant" net emissions increase are potentially subject to PSD permitting requirements as described in 40 CFR 52.21.

### **Process Description**

The Georgia-Pacific El Dorado, Arkansas Sawmill facility produces softwood lumber via a milling, drying, and finishing process. The three major manufacturing components of the facility are the sawmill, lumber dry kilns (direct and indirectly steam heated), and the planer mill.

Incoming logs are typically stored on-site prior to processing. Oversized or crooked logs are cut to length by the buck saw before entering the debarker. Some logs pass directly through the buck saw without being cut and head directly to the debarker. Debarked logs are sent through a series of chippers, curve saws, resaws, edgers, and trimmers. The end product of this process is rough, green dimensional lumber and wide, thick "flitches". Flitches are exported for remanufacturing overseas.

Bark, green sawdust and chips are generated in the sawmill process. The tree bark is hogged and used as boiler fuel. The chips are screened for proper sizing and sold to pulp/paper mills. Sawdust is either sold or mixed with hogged bark for boiler fuel to be burned in the wood-fired boiler (SN-08).

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The rough, green boards are sorted, stacked, and stored in the green storage yard before being dried by lumber dry kilns, either directly or indirectly heated. Purchased offsite lumber may also be dried by the kilns. These 7 kilns (SN-01) are: 3 direct-fired natural gas kilns, 3 high temperature steam kilns and one low temperature steam kiln. Kiln drying times vary between kilns and products. The drying times range from 24 to 48 hours. The dried rough lumber is then stored in the cooling sheds before either being processed in the planer mill or shipped offsite.

The rough dry lumber is finished in the planer mill by the planer or sent to the lumber storage/shipping area. Lumber planed by the planer/moulder may also be stored prior to shipment offsite. Planer shavings generated by the planer/moulder are pneumatically conveyed, via three cyclones (SN-09, SN-10 and SN-11) in series, to a shavings bin prior to offsite shipment. Wood residuals generated by the trim saws are hogged before being pneumatically conveyed, via three cyclones (SN-09, SN-10 and SN-11) in series, to the shavings bin for offsite shipment.

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table.

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
Total Allowable Emissions		PM	33.0 <sup>1</sup>	330.5	N/A
		PM <sub>10</sub>	33.0 <sup>1</sup>	218.5	
		SO <sub>2</sub>	1.6 <sup>1</sup>	7.0	
		VOC	2.3 <sup>1</sup>	230.4	
		CO	125.1 <sup>1</sup>	471.1	
		NO <sub>x</sub>	15.7 <sup>1</sup>	72.8	
		Pb	0.1	0.4	
		Formaldehyde	*	2.4	
		Phenol	*	2.3	
		Acetaldehyde	*	1.3	
		<sup>4</sup> MEK	*	0.1	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
01	Lumber Kilns <sup>2</sup>	PM	149.0	10.5	9
		PM <sub>10</sub>	149.0	10.5	
		SO <sub>2</sub>	0.3	0.1	
		VOC	3206.0	220.3	
		CO	18.0	1.1	
		NO <sub>x</sub>	71.0	4.2	
		Formaldehyde	35.4	2.4	
		Phenol	25.2	2.3	
		Acetaldehyde	20.0	1.3	
		MEK	2.0	0.1	
02-07	Reserved.				
08	Eric City Boiler	PM	25.1	110.0	11
		PM <sub>10</sub>	25.1	110.0	
		SO <sub>2</sub>	1.6	6.9	
		VOC	2.3	10.1	
		CO	125.1	470.0	
		NO <sub>x</sub>	15.7	68.6	
		Pb	0.1	0.4	
09	Planer Mill Cyclone 1	PM	5.0	22.1	14
		PM <sub>10</sub>	5.0	22.1	
10	Planer Mill Cyclone 2	PM	0.5	2.4	14
		PM <sub>10</sub>	0.5	2.4	
11	Shavings Bin Cyclone	PM	2.5	10.5	14
		PM <sub>10</sub>	2.5	10.5	
F-01	Unpaved Roads <sup>3</sup>	PM	956	175	16
		PM <sub>10</sub>	344	63	

1 - These totals do not include the emissions from the kilns nor unpaved roads.

2 - The rates listed are in pounds per charge and tons per year.

3 - The rates listed are in pounds per day and tons per year.

4 - Methyl Ethyl Ketone.

\* - Emissions are given in pounds of pollutant per charge.

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### **SECTION III: PERMIT HISTORY**

The facility was constructed in 1942. Various modifications took place between 1942 and 1981. Towards the end of the 1970's there were 9 gas-fired, single-track dry kilns, a wood-fired boiler, a planer mill and a teepee burner.

Permit #703-A was the first air permit issued to Georgia-Pacific Corporation on January 28, 1983. The facility was permitted for a re-installed boiler (relocated from another facility), three existing and two kilns. The facility was permitted to emit 41.7 pounds of particulate matter per hour. Emissions were controlled by a multiclone system. Particulate matter was the only pollutant permitted with this permitting action. Additional information submitted with the initial Title V application lists a shavings bin, and planer mill (2 planer machines) as grandfathered sources at the time of the 1983 permitting action.

Three gas-fired kilns were demolished in 1985.

Permit #703-AR-1 was issued to the facility on April 27, 1987. Particulate emissions were 6.3 tons per year and a restriction on hours of operation. The facility was permitted to emit 241.5 tons per year of particulate matter. Particulate matter was the only pollutant permitted with this permitting action.

Steam heated kilns were added in 1988 (SN-03 of permit issued in 1996) and in 1989 (SN-04 of the permit issued in 1996).

Permit #703-AR-2 was issued to the facility on June 26, 1995. This permitting action increased the lumber throughput to the planer mill, replaced three existing cyclones with new high efficiency cyclones, included other air pollutants from SN-08 and SN-12, and re-numbered some sources. This permit issuance quantified CO emissions for the first time at 483.3 tons per year and increased particulate emissions by 12.22 tons per year to 155.5 tons per year (without considering fugitive emissions). Kiln emissions were quantified and permitted for the first time (SN-01 through SN-07). SN-04 was renumbered SN-08. SN-05 was renumbered SN-09. SN-06 was renumbered SN-10. SN-03 was renumbered SN-11.

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PSD issues: Based on emission factors available at the time, none of the modifications would have resulted in PSD review. Specifically, CO emission for the boiler were estimated using NCASI emission factors until 1995 when source specific numbers were used instead. Also VOC emission factors from kilns at the time would have quantified emission increases below PSD significance levels and kilns were not typically permitted at that time.

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#### **SECTION IV: EMISSION UNIT INFORMATION**



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**SN-01**  
**Lumber Kilns**

**Source Description**

Rough boards and lumber that has been purchased offsite may be dried at SN-01 which consists of seven (7) kilns; three (3) direct-fired natural gas kilns, three (3) high temperature steam kilns, and one low temperature steam kiln.

**Specific Conditions**

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with pound per charge emission rates will be demonstrated by permitting this source at maximum charge rates. Compliance with ton per year emission rates will be demonstrated by Specific Condition 3.

Pollutant	lb/charge	tpy
PM <sub>10</sub>	149.0	10.5
SO <sub>2</sub>	0.6	0.1
VOC	3206.0	220.3
CO	18.0	1.1
NO <sub>x</sub>	71.0	4.2

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2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with pound per charge emission rates will be demonstrated by permitting this source at maximum charge rates. Compliance with ton per year emission rates will be demonstrated by Specific Condition 3.

Pollutant	lb/charge	tpy
PM	149.0	10.5
Formaldehyde	35.4	2.4
Phenol	25.2	2.3
Acetaldehyde	20.0	1.3
Methyl Ethyl Ketone	2.0	0.1

3. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6, the permittee shall not dry more than 127 million board feet of lumber per consecutive twelve month period and 18 million board feet per month at SN-01.
4. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set forth in Specific Condition 3. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. A consecutive twelve month total and each individual month's data shall be submitted in accordance with General Provision 7.

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**SN-08**  
**Erie City Boiler**

**Source Description**

SN-08 is designated for Georgia - Pacific El Dorado's 93 MMBTU/HR Erie City Boiler. The boiler will burn wood and used oil generated on-site, and soil absorbent material (sawdust) that is used to clean up incidental oil spills around the plant. Particulate emissions from this source will be controlled by a Zurn Multiclone. The boiler was removed from another sawmill and re-installed at El Dorado in 1983. Due to the boiler's installation date it will not be subject to the provisions of 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*.

**Specific Conditions**

5. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with pound per hour emission rates will be demonstrated by permitting SN-08 at max hourly rates. Compliance with ton per year emission rates will be demonstrated by Specific Conditions 7 and 9.

Pollutant	lb/hr	tpy
PM <sub>10</sub>	25.1	110.0
SO <sub>2</sub>	1.6	6.9
VOC	2.3	10.1
CO	125.1	470.0
NO <sub>x</sub>	15.7	68.6
Pb	0.1	0.4

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6. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with pound per hour emission rates will be demonstrated by permitting SN-08 at max hourly rates. Compliance with ton per year emission rates will be demonstrated by Specific Conditions 7 and 9.

Pollutant	lb/hr	tpy
PM	25.1	110.0

7. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not burn used oil at SN-08 in excess of 1000 gallons per year.
8. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set forth in Specific Condition 7. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. A consecutive twelve month total and each individual month's data shall be submitted in accordance with General Provision 7.
9. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not burn boiler fuel (wood residuals) in excess of 78,900 tons per year and 6,700 tons per month at SN-08.
10. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the pounds of steam generated per month which shall then be used to determine the tons of fuel per month. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. A consecutive twelve month total and each individual month's data shall be submitted in accordance with General Provision 7.
11. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, visible emissions from SN-08 shall not exceed 20% as measured by EPA reference method 9. Compliance with this condition shall be demonstrated through compliance with Specific Condition 12.
12. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from SN-08 shall be conducted by personnel familiar with the permittee's visible emissions. Six months after issuance of this permit, these observations shall be

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conducted by personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.

- a. The date and time of the observation.
- b. If visible emissions which appeared to be above the permitted limit were detected.
- c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
- d. The name of the person conducting the opacity observations.

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**SN-09, SN-10, and SN-11**  
**Planer Mill Cyclone 1, Planer Mill Cyclone 2, Shavings Bin Cyclone**

**Source Description**

SN-09 is designated for G-P's Planer Mill Cyclone. SN-10 is designated for the facility's Planer Mill Cyclone 2. SN-11 is designated for the facility's Shavings Bin Cyclone.

**Specific Conditions**

13. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with pound per hour and ton per year emission rates will be demonstrated by permitting these sources at capacity.

SN#	Pollutant	lb/hr	ton/yr
SN-09	PM <sub>10</sub>	5.0	22.1
SN-10	PM <sub>10</sub>	0.5	2.4
SN-11	PM <sub>10</sub>	2.4	10.5

14. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with pound per hour and ton per year emission rates will be demonstrated by permitting these sources at capacity.

SN#	Pollutant	lb/hr	ton/yr
SN-09	PM	5.0	22.1
SN-10	PM	0.5	2.4
SN-11	PM	2.4	10.5

15. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, visible emissions from SN-09, SN-10, and SN-11 shall not exceed 20% as measured by EPA reference method 9. Compliance with this condition shall be demonstrated through compliance with Specific Condition 16.

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16. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from SN-09, SN-10, and SN-11 shall be conducted by personnel familiar with the permittee's visible emissions. Six months after issuance of this permit, these observations shall be conducted by personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request.
- a. The date and time of the observation.
  - b. If visible emissions which appeared to be above the permitted limit were detected.
  - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
  - d. The name of the person conducting the opacity observations.

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**SN-F-01**  
**Unpaved Roads**

**Source Description**

SN-F-01 is designated for Georgia - Pacific Corporation's Unpaved Roads.

**Specific Conditions**

17. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with pound per day and ton per year emission rates will be demonstrated by permitting these sources at capacity.

SN#	Pollutant	lb/day	ton/yr
SN-F-01	PM <sub>10</sub>	344	63

18. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with pound per day and ton per year emission rates will be demonstrated by permitting these sources at capacity.

SN#	Pollutant	lb/day	ton/yr
SN-F-01	PM	956	175

19. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall water all unpaved roads as necessary to assure that unnecessary amounts of air contaminants do not become airborne.



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

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

**SECTION VI: PLANTWIDE CONDITIONS**

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
  - A. Sampling ports adequate for applicable test methods
  - B. Safe sampling platforms
  - C. Safe access to sampling platforms
  - D. Utilities for sampling and testing equipment
5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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

**Title VI Provisions**

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

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9. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
10. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

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

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

**Permit Shield**

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

- A. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated August 12, 1996.

Source #	Regulation	Description
Facility	19	SIP
Facility	26	Arkansas Operating Permit Regulations

- B. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

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

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

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

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## **SECTION VII: INSIGNIFICANT ACTIVITIES**

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated 08/12/96.

Insignificant Activities List			
Source/Unit	Unit Description	Reg.	Comment.
Diesel Storage Tank	12,000 gal AST <sup>1</sup>	#26 Group D	Storage tanks contain organic liquids less than 10,000 gallons with a true vapor pressure less than 0.5 psia.
Gasoline Storage Tank	5,890 gal AST	#26 Group A,3	
Used Oil Storage Tank	5,000 gal AST	#26 Group A,3	
3-Utility 150 Oil Tanks	220 gal AST	#26 Group A,3	
30W Oil Tank	220 gal AST	#26 Group A,3	
Seneca 150 Oil Tank	220 gal AST	#26 Group A,3	
Diesel Tank	220 gal AST	#26 Group A,3	
8-AW68 Hydraulic Oil Tanks	220 gal AST	#26 Group A,3	
Diesel Tank	100 gal AST	#26 Group A,3	
Polymer (boiler) Tank	2,200 gal AST	#26 Group A,3	
Neutrafilm Tank	1,500 gal AST	#26 Group A,3	

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E-01	Sawmill Hog	#26 Group C	These sources were submitted for investigation and have received approval to be classified as exempt sources by ADPC&E.
E-02	Planer Hog	#26 Group C	

1 - AST > Aboveground Storage Tank.

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

1. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.
2. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.
4. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
5. Consumer use of office equipment and products, not including commercial printers or business primarily involved in photographic reproduction.
6. Janitorial services and consumer use of janitorial products.
7. Internal combustion engines used for landscaping purposes.
8. Laundry activities, except for dry-cleaning and steam boilers.
9. Bathroom/toilet emissions.
10. Emergency (backup) electrical generators at residential locations.

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11. Tobacco smoking rooms and areas.
12. Blacksmith forges.
13. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
14. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.<sup>1</sup>
15. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface-coating or products.
16. Portable electrical generators that can be "moved by hand" from one location to another.<sup>2</sup>
17. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.
18. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.<sup>3</sup>
19. Air compressors and pneumatically operated equipment, including hand tools.
20. Batteries and battery charging stations, except at battery manufacturing plants.

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

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

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



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21. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.<sup>4</sup>
22. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and no volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
23. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
24. Drop hammers or presses for forging or metalworking.
25. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
26. Vents from continuous emissions monitors and other analyzers.
27. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
28. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.
29. Lasers used only on metals and other materials which do not emit HAPs in the process.
30. Consumer use of paper trimmers/binders.
31. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
32. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
33. Laser trimmers using dust collection to prevent fugitive emissions.

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

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34. Bench-scale laboratory equipment used for physical or chemical analysis not including lab fume hoods or vents.
35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
37. Hydraulic and hydrostatic testing equipment.
38. Environmental chambers not using hazardous air pollutant gases.
39. Shock chambers, humidity chambers, and solar simulators.
40. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
41. Process water filtration systems and demineralizers.
42. Demineralized water tanks and demineralizer vents.
43. Boiler water treatment operations, not including cooling towers.
44. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.
45. Oxygen scavenging (de-aeration) of water.
46. Ozone generators.
47. Fire suppression systems.
48. Emergency road flares.
49. Steam vents and safety relief valves.
50. Steam leaks.

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51. Steam cleaning operations.
52. Steam and microwave sterilizers.
53. Site assessment work to characterize waste disposal or remediation sites.
54. Miscellaneous additions or upgrades of instrumentation.
55. Emissions from combustion controllers or combustion shutoff devices but not combustion units itself.
56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).
57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
58. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
59. Residential wood heaters, cookstoves, or fireplaces.
60. Barbecue equipment or outdoor fireplaces used in connection with any residence or recreation.
61. Log wetting areas and log flumes.
62. Periodic use of pressurized air for cleanup.
63. Solid waste dumpsters.
64. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.
65. Natural gas odoring activities unless the Department determines that emissions constitute air pollution.
66. Emissions from engine crankcase vents.
67. Storage tanks used for the temporary containment of materials resulting from an

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emergency reporting of an unanticipated release.

68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
69. Mixers, blenders, roll mills, or calenders for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.
70. The storage, handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to the equipment only).
71. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
72. Tall oil soap storage, skimming, and loading.
73. Water heaters used strictly for domestic (non-process) purposes.
74. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
75. Agricultural operations, including onsite grain storage, not including IC engines or grain elevators.
76. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.

**SECTION VIII: GENERAL PROVISIONS**

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
  1. The date, place as defined in this permit, and time of sampling or measurements;
  2. The date(s) analyses were performed;
  3. The company or entity that performed the analyses;
  4. The analytical techniques or methods used;

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5. The results of such analyses; and
  6. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

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

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the occurrence. The initial report may be made by telephone and shall include:
1. The facility name and location,
  2. The process unit or emission source which is deviating from the permit limit,
  3. The permit limit, including the identification of pollutants, from which deviation occurs,
  4. The date and time the deviation started,
  5. The duration of the deviation,
  6. The average emissions during the deviation,
  7. The probable cause of such deviations,

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

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.



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19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
  1. 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;
  2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  4. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
  1. The identification of each term or condition of the permit that is the basis of the certification;
  2. The compliance status;
  3. Whether compliance was continuous or intermittent;
  4. 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
  5. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:

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1. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  2. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  3. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
  4. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.