

ADEQ OPERATING AIR PERMIT

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

Permit #:703-AOP-R1

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:

April 17, 2000 and April 16, 2005

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE:	Georgia - Pacific Corporation - El Dorado Sawmill
CSN:	70-0032
PERMIT NUMBER:	703-AOP-R1
FACILITY ADDRESS:	Highway 167 South 5482 Junction City Hwy El Dorado, AR 71730
COUNTY:	Union
CONTACT POSITION:	Mr. Robert Hanry
TELEPHONE NUMBER:	(870) 863-4182
REVIEWING ENGINEER:	Melisha Griffin
UTM North-South (X):	Zone 15 [3,666]
UTM East-West (Y):	Zone 15 [534]

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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).

In order to experience increased efficiencies and to reduce costs (cost per unit of product decreases as production increases), Georgia-Pacific is now proposing to increase production/throughput beyond the limits that were established in the earlier permit.

Seven lumber drying kilns are currently in operation at the facility - three of these are natural gas-fired and four are steam-heated. Steam for the steam-heated kilns is supplied by the wood fired boiler. There are two possible scenarios being considered for increasing production. One scenario involves maintaining the existing seven kilns and just establishing a higher production level of 160 million board feet annually. This same scenario would increase the current fuel-use limit on the boiler from 78,900 tons of wood/bark annually to 90,000 tons, approximately representing full utilization. A second scenario would involve the demolishing of one or more of the existing kilns (most likely the gas-fired kilns and possibly one of more steam-heated kilns) and replacing them with two or three steam-heated kilns. The final decision has not been made regarding which scenario will be implemented. Based on the information obtained from the application, the permit has been written based on the facility using only the existing equipment (Scenario 1) and based on the facility installing 2 new kilns, without taking into consideration the demolition of any existing kilns (Scenario 2).

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.

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. Sawdust is either sold or mixed with hogged bark for boiler fuel for 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 in one of seven lumber drying kilns. Purchased lumber may also be dried in the kilns as well. These seven kilns (SN-01) include three direct-fired natural gas kilns, three high temperature steam-heated kilns, and one low temperature steam-heated kiln. Kiln drying times vary, depending on the kiln and the product being dried. The drying times typically range from 24 to 48 hours. After drying, the rough lumber is 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 planers or sent to the lumber storage/shipping area. Planer shavings 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 and are also pneumatically conveyed to the shavings bin via the same three cyclones.

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.

Prevention of Significant Deterioration

Georgia - Pacific has the potential to emit greater than 250 tons per year (tpy) of at least one regulated pollutant (Carbon Monoxide [CO]). Through this modification, the facility wide emissions increase will exceed several PSD Significant Emission Rates. Therefore, Georgia Pacific is a major source with respect to Title V and PSD permitting. A summary of the emissions that are above the PSD Significant Emissions Rates are contained in the following table. These are comparisons of permitted to past actuals. The difference in the two scenarios results from higher permitted levels in Scenario 2 (possible because of the installation of additional kilns) and the availability of creditable reductions in Scenario 1.

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Polluta nt	PSD Significant Emission Rates		
	Facility-wide Emissions Increase (tons per year)	Facility-wide Emissions Increase (tons per year)	PSD Significant Emission Rate (tons per year)
	Scenario #1	Scenario #2	
CO	185.9	134.8	100
PM	----	39.2	25
PM ₁₀	----	39.2	15
VOC	128.2	269.8	40

United States Environmental Protection Agency (EPA) and Arkansas Department of Environmental Quality (ADEQ) rules require major new facilities and major modifications to undergo several analyses for emission increases subject to Prevention of Significant Deterioration (PSD) review. Since only CO, PM/PM₁₀, and VOC exceeds the PSD significant emission rate, CO is analyzed further for Scenario 1, and CO and PM₁₀ is analyzed further for Scenario 2. These analyses determine whether significant air quality deterioration will result from the modified facility. VOC is addressed in the BACT analysis for both Scenarios.

AIR QUALITY ANALYSIS

Georgia-Pacific (G-P) is proposing two sets of construction plans of physical changes and/or increases in productions rates at the El Dorado Plant. Once the new air permit is issued, G-P will pursue one of the following two plans:

- % Scenario 1: Maintain the existing seven kilns. Increase the annual production level to 160 million board feet (MMbf) and increase the annual fuel-use limit in the boiler from 78,900 tons per year of wood/bark to approximately 90,000 tons.
- % Scenario 2: Demolish one or more of the existing kilns (gas-fired kilns and/or steam-heated kilns) and replace them with two or three new steam-heated kilns.

An air dispersion modeling analysis is required as part of this PSD permit application. The air dispersion modeling analysis is used to demonstrate that emissions from the modified facility will not cause or contribute to a violation of any applicable National Ambient Air Quality

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Standard (NAAQS) or exceed a PSD Increment. The air quality analysis is organized into two major sections for each applicable pollutant: the *significance analysis* and the *full impact analysis*. The full impact analysis is further subdivided into the NAAQS and PSD Increment Analysis.

As stated above, Scenario 1 will result in emissions increases above the significant emission rate for VOC and carbon monoxide (CO). Modifications for Scenario 2 will trigger these two pollutants and also particulate matter less than 10 microns in diameter (PM₁₀). Therefore, the project is subject to PSD review for these pollutants.

Significance Analysis

Carbon Monoxide - Scenarios 1 & 2

By modeling the emissions that would result from the project, GP determined that the proposed project will not have a significant CO impact. The maximum 8-hour CO impact due to the project is 158.7 µg/m³, which is below the Significant Impact Level (SIL) and monitoring de minimis concentration of 500 and 575 µg/m³, respectively. In addition, the maximum 1 hour impact value of 384.0 µg/m³ is less than the modeling significance level for that averaging period (2000 µg/m³).

Particulate Matter - Scenario 2 only

The maximum 24-hour PM₁₀ impact due to the project is 57.5 µg/m³, which is above the SIL and monitoring de minimis concentration of 5 and 10 µg/m³, respectively. In addition, the maximum annual impact of 4.66 µg/m³ exceeds the modeling significance level. Therefore, G-P performed a full NAAQS analysis for the Scenario 2 configuration.

The table below summarizes the applicable SILs, Monitoring De Minimis Concentrations, and Maximum Modeled Concentrations for CO and PM₁₀.

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Scenario	Pollutant	Averaging Period	Significant Impact Level* ($\mu\text{g}/\text{m}^3$)	Monitoring De Minimis Concentration* ($\mu\text{g}/\text{m}^3$)	Maximum Modeled Concentration ($\mu\text{g}/\text{m}^3$)
1	CO	1-hour* 8-hour	2,000 500	N/A 575	384 158.7
2	CO	1-hour* 8-hour*	2,000 500	N/A 575	281.1 116.2
	PM ₁₀	24-hour* Annual	5 1	10 N/A	57.5 4.66

* High 1st Highest

Full Impact Analysis - Scenario 2 only

If any of the emissions for the project are shown to have a significant impact (i.e., if any ambient concentration exceeds an SIL for a particular pollutant), a full impact analysis for that pollutant is required. For this air quality analysis, PM₁₀ in Scenario 2 has a predicted ambient impacts above the applicable SIL. Thus, all sources emitting PM₁₀ within 50 kilometers of the area of significant impact must be considered in the full impact analysis.

NAAQS Analysis

By modeling the total potential Plant emissions and competing source emissions, G-P determined that the maximum PM₁₀ predicted impacts are 53.1 and 8.28 $\mu\text{g}/\text{m}^3$ for the 24-hour and annual averaging times, respectively. GP added background concentrations of 56 and 25.6 $\mu\text{g}/\text{m}^3$ to the modeling results for the 24-hour and annual averaging periods, respectively. When adding the background concentrations, the 24-hour average and annual concentrations are 109.1 and 33.9 $\mu\text{g}/\text{m}^3$, respectively. These impacts are less than the respective NAAQS of 150 $\mu\text{g}/\text{m}^3$ for the 24-hour average and 50 for annual. Therefore, G-P demonstrated that the Plant emissions that reflect all project changes will not cause or contribute to a violation of the NAAQS. The table below summarizes the NAAQS modeling results.

			Predicted
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Pollutant	Averaging Period	Standard ($\mu\text{g}/\text{m}^3$)	Concentration (modeled +background) ($\mu\text{g}/\text{m}^3$)
PM ₁₀	Annual 24-hour (High 6 th Highest)	50 150	33.9 109.1

PSD Class II Increment Analysis

By modeling the increment-affecting emissions from the Plant and competing source, G-P determined that the maximum PM₁₀ increment predicted impacts are 29.2 $\mu\text{g}/\text{m}^3$ and 1.42 $\mu\text{g}/\text{m}^3$ for the 24-hour and annual averaging times, respectively.

The Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) states in Section 19.904(C)(4) that an air quality impact analysis is required to also verify that no individual major source would result in the consumption of 50% of any available annual increment or 80% of any short term increment. Each pollutant's contribution is well below the Regulation 19 requirements. The table below summarizes the PSD Increment modeling results.

Pollutant	Averaging Period	PSD Class II Increment ($\mu\text{g}/\text{m}^3$)	Max Predicted Concentration * ($\mu\text{g}/\text{m}^3$)	Percent of Standard	Percent of Available Increment
PM ₁₀	Annual	17	1.42	8.4%	9.1**
	24-hour*	30	29.2	97.3% 37.3%	-- --

*High 2nd High

**The annual increment consumption of GP and the competing sources (8.4%) is well below 50% of the standard increment; therefore, it follows that the impact from GP alone is less than 50% of the available annual increment ($1.42/(17-1.42) = 9.1\%$). The short-term increment is 29.2 $\mu\text{g}/\text{m}^3$ along the facility's property line and includes the impact from competing sources. However, according to the model data, 11.3 $\mu\text{g}/\text{m}^3$ is the highest impact beyond the facility's property line and quite less than 80% ($11.2/30 = 37.3\%$) of the short-term increment consumption limit. Therefore, GP demonstrated that the Plant emissions will not exceed 80% of the available PSD Class II Increment.

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ADDITIONAL IMPACTS ANALYSIS

Growth Analysis

No significant increase in additional personnel will be added to the current plant staff because of the project. Therefore, there will be no significant effects on the residential, commercial, and industrial growth in the Plant area.

Soil and Vegetation Analysis

Predicted impacts that will result from the project are less than the NAAQS and state AAQS. As such, G-P expects that the increase in emissions due to the project will not adversely impact the areas adjacent to the El Dorado plant.

Visibility Analysis

The El Dorado Plant is isolated from the town and other sensitive areas where visibility could be affected. The distance to the nearest significant recreational area (*e.g.*, State Parks) is well beyond the significant impact distance of 1.5 km. The distance to the nearest airport is also well beyond the significant impact distance of 1.5 km. With these low levels of predicted impacts, G-P expects that the visibility at recreational areas and airports will not be adversely affected.

PSD Class I Analysis

Generally, if the project site is within 100 kilometers (km) of a PSD Class I area, a significant impact analysis is also performed at the PSD Class I area. The nearest PSD Class I areas to the Plant is the Caney Creek National Wilderness Area. The shortest distance from the complex to this area is 160 km. Because of the great distance, G-P did not conduct any impact analyses for these areas.

BACT ANALYSIS

As a part of the PSD review for Georgia Pacific, a Best Available Control Technology (BACT) analysis was required. A BACT determination is a case-by-case analysis that addresses the technological question of whether a proposed control technique can be considered BACT for the particular application or whether a more stringent level of emission control should be used. This determination involves an assessment of the availability of applicable technologies capable of sufficiently reducing a specific pollutant emission, as well as weighing the economic, energy, and environmental impacts of using each technology.

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The methodology used by the permittee to determine BACT followed the “top-down” approach. The “top-down” BACT contains the following elements:

- % Determination of the most stringent control alternatives potentially available.
- % Discussion of the technical and economic feasibility of each alternative.
- % Assessment of energy and environmental impacts, including toxic and hazardous pollutant impacts, of feasible alternatives.
- % Selection of the most stringent control alternative that is technically and economically feasible and that provides the best overall control of all pollutants.

The selected BACT must be at least as stringent as New Source Performance Standards for the source.

A BACT analysis was performed for each regulated pollutant emitted in amounts that exceed the PSD significance levels. BACT applies to each emissions unit at which a significant net emissions increase in the pollutant would occur as a result of a physical change or change in the method of operation in the unit.

For Scenario 1, there are no physical modifications taking place; however, previous permits established limitations on new equipment to avoid PSD review. The modifications that were actually taking place at the time that the previous limits were established in 1995 were directed at rebuilding two sawmill lines (green end). There were no physical changes made to either the boiler or the lumber drying kilns. Three cyclones were changed out - two in the planer mill and one associated with the shavings bin. Neither the sawmill sources, nor the equipment with new cyclones, emit carbon monoxide or volatile organic compounds, the two pollutants to be reviewed under the PSD permit application. As such, there are no emission units to be reviewed for BACT under Scenario 1.

For Scenario 2, the new lumber drying kilns require a BACT analysis. The boiler and cyclones are “affected”, but non-modified sources.

Therefore, the BACT analysis for Georgia Pacific considers emission controls for PM, PM₁₀ and VOC for Scenario 2.

BACT Analysis For The Kilns

The following control options were considered for application to drying in lumber kilns:

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%	Carbon absorption (VOCs)
%	Biofiltration (VOCs)
%	Recuperative thermal oxidation (VOCs)
%	Recuperative catalytic oxidation (VOCs)
%	Regenerative thermal oxidation (VOCs)
%	Use of on-site wood-fired boiler (VOCs)
%	Baghouses (PM)
%	Dry electrostatic precipitator (PM)
%	Wet electrostatic precipitator (VOCs and PM)
%	Venturi Scrubber (PM)

Carbon Absorption

Carbon adsorption recovers VOC-containing gas streams by passing the gas stream through a static “bed” of activated carbon. The bed of carbon must be regenerated after it becomes saturated with VOCs. VOC removal efficiencies above 90% are achievable, depending upon the ability of the carbon to absorb the particular VOC. Adsorption of VOCs (mainly terpenes) would be impeded by the high moisture content of the gas stream. This would greatly reduce the VOC removal efficiency. Regeneration of the activated carbon (by thermal desorption) would require excessively high temperatures that would damage the media. Additionally, the resinous (sticky) quality of the VOCs would clog the pores of the activated carbon, thus impeding the ability of the carbon to adsorb the VOCs. Based on these facts, this technology is considered to be technically infeasible.

Biofiltration

Biofiltration uses microorganisms to break down organic compounds into carbon dioxide, water, and salts. The biological process, an oxidation reaction by the microorganisms, is as follows:



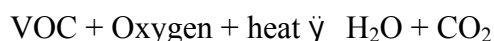
The microorganisms live in a thin layer of moisture, the biofilm, which is built around the particles of the filter material. The contaminated gas is diffused in the biofilter and adsorbed onto the biofilm. Microorganisms work best between 85 to 105 degrees Fahrenheit (°F). Gas stream temperatures well above 105 °F will kill the bacteria contained in the filter media and thereby negate its effectiveness. This VOC removal technology has the capability to remove over 90% of the VOCs emitted from a gas stream when used under proper operating conditions. However, the average temperature exiting a typical lumber kiln is about 260 °F during the overall drying cycle time. The exhaust temperature from the lumber kilns averages 260 °F. This

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is much higher than the upper temperature limit where the microorganisms can survive (optimum range is around 85 to 105 °F). The high temperatures would kill the microorganisms and make the media inactive. Additionally, the sticky quality of the VOCs would tend to clog the filter media, thus reducing or eliminating the ability of the microorganisms to work properly. Based on these facts, this technology is considered to be technically infeasible.

Recuperative Thermal Oxidation

Recuperative thermal oxidizers efficiently react volatile organic compounds with oxygen in the air to form naturally occurring carbon dioxide and water vapor. The reaction that takes place is as follows:



This reaction occurs when the air is heated to a sufficiently high temperature, typically 1,400 to 1,600 °F. The fuel needed to heat the gas stream to the oxidation temperature is greatly reduced by the use of a "recuperator", or preheater. The preheater will recover as much as 95% of the heat, thus providing significant fuel savings as compared to a system that does not incorporate a preheater. These types of oxidizers can remove 99+% of VOCs from a gas stream. While this type of control device could theoretically be used to control VOC emissions from lumber kilns, there are a number of practical factors that make it technically infeasible:

- % Exhaust controls are not technically feasible because of the difficulty designing and implementing a capture device which will accommodate the cyclical nature (exhaust/intake vents cycling back-and-forth and from one side to the other) of the air flow through the kiln vents.
- % The highly variable VOC content of the gas stream being treated would make temperature control in the combustion section problematic. Controls would not be able to respond quickly to these swings in VOC content, thus reducing the VOC destruction efficiency of the oxidizer.

Based on the above facts, this technology is considered to be technically infeasible.

Recuperative Catalytic Oxidation

In contrast to recuperative thermal oxidizers, recuperative catalytic oxidizer (RCO) systems use a catalyst to encourage the oxidation reaction instead of depending on heat alone. Reactions in a recuperative catalytic oxidizer usually take place between 500 and 600 °F. This creates the opportunity to reduce fuel expenses and material costs (since the materials of construction are subjected to much lower temperatures). The addition of a preheater will further reduce the fuel

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costs. These types of oxidizers are just as capable in removing VOCs from a gas stream as the non-catalytic systems. VOC destruction efficiencies can be as high as 99% or greater. This technology is considered to be technically infeasible for the same reasons as stated for the recuperative thermal oxidizer, plus:

- % The resinous quality of the VOCs being treated would tend to clog the catalyst bed, thus reducing, or eliminating the ability of the catalyst to properly destroy VOCs.

Based on these facts, this technology is considered to be technically infeasible.

Regenerative Thermal Oxidation

Regenerative thermal oxidizers build on the principle of thermal oxidation, but with enhanced fuel efficiency. This technology is considered to be technically infeasible for the same reasons as stated for the recuperative thermal and catalytic oxidizers.

Use of On-site Wood-Fired Boiler

The on-site boiler present at the El Dorado Sawmill has a heat input rating of 93 million British thermal units per hour (MMBTU/hour). It burns primarily green wood residuals (sawdust and bark), some dry wood residuals, and a small quantity of used oil. Combustion temperatures in the boiler are higher than the temperatures normally encountered in a thermal oxidizer (see discussion above), and can therefore effectively destroy VOCs in the incoming gas stream. The estimated flow rate of combustion air for this boiler is about 16,500 actual cubic feet per minute (acfm). This boiler requires approximately 16,500 acfm of combustion air to operate properly. The total gas flow from both lumber kilns would be approximately 21,600 acfm. This means that the boiler is currently not capable of handling all of the exhaust gases from the lumber kilns. Therefore, this technology is considered to be technically infeasible for this application.

Baghouses

A baghouse, or fabric filter, is one of the most efficient devices for removing particulate matter. Baghouses have the capability to maintain collection efficiencies above 99% for particles as small as 0.3 microns in aerodynamic diameter. The particles are collected in dry form on a cake of dust supported by the fabric or on the fabric itself. Cake dust is removed by the use of a mechanical shaking or "rapping" system, with the use of reverse air, or with the use of a pulse jet of air. However, baghouses could not be used to control particulate matter from lumber kilns due to the high moisture content of the air stream (generated by steam heating) and the sticky,

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resinous nature of the particles in the air stream. Baghouse filters will not work if they become wet; the filter media will lose its ability to create a dry dust "cake" on the surface of the filter media and collection efficiency would drop significantly. The sticky, resinous particles would clog up the filter media and air would not be able to "flow through" the media as required for the system to operate properly. For these reasons, the use of this technology is considered to be technically infeasible.

Dry/Wet Electrostatic Precipitator and Venturi Scrubber

Dry electrostatic precipitators (ESPs) use electrical energy to charge and collect particles with a very high removal efficiency. The classification of ESPs may be as wet or dry systems and/or single-stage or two-stage systems. Dry systems are the predominant type used in industrial applications. Dust particles entering the housing are charged by ions from the discharge electrodes. Dust is collected on the collection electrodes (also referred to as plates). Rappers serve as the cleaning mechanism for dry ESPs.

A wet electrostatic precipitator is a relatively simple device, primarily used in the control of particulate matter. Dust laden gases are pushed or pulled through the box with the assistance of a fan. The air flow is channeled into lanes formed by the collection plates or tubes. Discharge electrodes are centered between each collection plate/tube to provide a negative charge to the surrounding dust particles. The collection plates/tubes are positively grounded and act as a magnet for the negatively charged dust particles. The collected dust is transported down the collection plates and electrode with the assistance of a rapper or vibrator system into the collection hopper. WESPs have been used at oriented strandboard (OSB) plants, particleboard plants, and veneer plants to control VOC emissions from process dryer exhausts. In this application, a WESP serves to remove, not only particulate matter, but "condensable" VOCs (e.g., pinenes, terpenes, cymene, toluene, etc.) from process dryer exhausts. Depending upon the exhaust temperature and partial pressure considerations of each component, a WESP can reduce VOC emissions by 20-40% under optimum conditions. While there are no reported lumber kilns applying WESPs for particulate matter control, theoretically, a WESP could reduce VOC and particulate matter emissions from lumber drying kilns.

High-energy venturi scrubbers are ideal contacting devices for removal of sticky contaminants (such as resins released from the heating of lumber) and particulate matter from exhaust gases. They have the advantage of not plugging up and they do not require packing materials in order to work.

These devices (wet/dry electrostatic precipitators and venturi scrubbers) are primarily used in the removal of particulate matter, although some minor control of VOCs may occur under optimum conditions in a WESP or venturi scrubber. However, it would be difficult to design a system that

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would be able to handle the variations in exhaust vents that are alternatively open and closed, as well as the changes in air flow that must be accommodated. Additionally, for the dry ESP, the sticky, resinous nature of the particulate matter would cause a build-up on the collection plates, thereby reducing the collection efficiency of the unit. This sticky build-up could not be effectively removed by the rapping system. G-P is unaware of any lumber kilns in the country with these types of controls in place. Based on the above facts, even if these technologies could remove some small amount of VOCs, they are considered to be technically infeasible.

BACT Analysis Summary

All of the control equipment discussed above for removal of VOCs and particulate matter has been eliminated from further consideration due to technical infeasibility. Therefore, none of the control options discussed were ranked according to their effectiveness in reducing these pollutants.

BACT for VOC and particulate matter emissions from the lumber kilns would be proper maintenance and operation of the drying kiln with "no control" since all of the available control technologies have been eliminated due to technical infeasibility. This matches the entries found in EPA's RACT/BACT/LAER Clearinghouse. Review of the information contained from EPA's RACT/BACT/LAER Clearinghouse indicates there is currently no air emission control equipment in use for lumber kilns anywhere in the United States that can be documented. This is not only based on a review of EPA's RACT/BACT/LAER Clearinghouse and the California Air Resources Board BACT Clearinghouse, but it is also based on discussions with one of the United States' largest lumber kiln manufacturers. Based on these facts, Georgia-Pacific believes that no controls are technically feasible or economically justified for the lumber kilns.

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SCENARIO 1: Utilization of Existing Equipment

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	30.4 ¹	305.2	N/A
		PM ₁₀	30.4 ¹	193.2	
		SO ₂	2.5	10.5	
		VOC	3.5 ¹	319.3	
		CO	124.1	538.5	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
		NO _x	17.2	70.5	
		Lead	0.2	0.2	
		Acetaldehyde	1.1	3.2	
		Acrolein	0.6	2.2	
		Benzene	0.5	1.9	
		Formaldehyde	3.1	2.5	
		Hydrogen Chloride	2.2	8.3	
		Manganese	0.3	0.8	
		Methanol	5.5	16.8	
		Phenol	7.1	2.3	
		Styrene	0.3	0.9	
		Arsenic	0.01	0.1	
		Cadmium	0.01	0.1	
		Mercury	0.1	0.1	
		POM	0.1	0.1	
01	Lumber Kilns	PM	23.5 ²	1.8	23
		PM ₁₀	23.5 ²	1.8	
		SO ₂	0.1	0.1	
		VOC	4052.4 ²	304.0	
		CO	1.4	2.5	
		NO _x	1.7	3.0	
		Acetaldehyde	1.1	3.2	
		Acrolein	0.2	0.5	
		Benzene	0.1	0.2	
		Formaldehyde	3.1	2.5	
		Hydrogen Chloride	0.4	0.6	
		Lead	0.1	0.1	
		Manganese	0.1	0.1	
		Methanol	5.5	16.8	
		Phenol	7.0	2.2	
		Styrene	0.1	0.1	
02-07	Reserved.				
		PM	27.6	120.6	

Georgia - Pacific Corporation - El Dorado Sawmill
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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
08	Eric City Boiler	PM ₁₀	27.6	120.6	26
		SO ₂	2.4	10.4	
		VOC	3.5	15.3	
		CO	122.7	536.0	
		NO _x	15.5	67.5	
		Acrolein	0.4	1.7	
		Arsenic	0.01	0.1	
		Benzene	0.4	1.7	
		Cadmium	0.01	0.1	
		Hydrogen Chloride	1.8	7.7	
		Lead	0.1	0.1	
		Manganese	0.2	0.7	
		Mercury	0.1	0.1	
		POM	0.1	0.1	
		Phenol	0.1	0.1	
		Styrene	0.2	0.8	
09	Planer Mill Cyclone 1	PM	2.2	6.2	29
		PM ₁₀	2.2	6.2	
10	Planer Mill Cyclone 2	PM	0.3	0.8	29
		PM ₁₀	0.3	0.8	
11	Shavings Bin Cyclone	PM	0.3	0.8	29
		PM ₁₀	0.3	0.8	
F-01	Unpaved Roads ³	PM	956	175	31
		PM ₁₀	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.

Georgia - Pacific Corporation - El Dorado Sawmill
Permit #:703-AOP-R1
CSN #: 70-0032

SECTION III: PERMIT HISTORY

The facility was constructed in 1942. Various modifications took place between 1942 and 1981. Towards the end of the 1970s 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 renumbered 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.

Georgia - Pacific Corporation - El Dorado Sawmill
Permit #:703-AOP-R1
CSN #: 70-0032

PSD issues: Based on emission factors available at the time, none of the modifications would have resulted in PSD review. Specifically, CO emissions 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.

Permit #703-AOP-R0 was issued on April 17, 2000. This was the initial Title V permit for the facility. The changes in emissions from the facility's last permit came from revised emission factors and the inclusion of fugitive emissions. There were no changes in the method of operation with the issuance of this permit.

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Permit #:703-AOP-R1
CSN #: 70-0032

SECTION IV: EMISSION UNIT INFORMATION

Georgia - Pacific Corporation - El Dorado Sawmill
Permit #:703-AOP-R1
CSN #: 70-0032

SN-01
Lumber Kilns

Source Description

Rough boards and lumber that have 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 and 5.

Pollutant	lb/hr	tpy (combined)
PM ₁₀	23.5*	1.8
SO ₂	0.1	0.1
VOC	4052.4*	304.0
CO	1.4	2.5
NO _x	1.7	3.0

* total lb/charge

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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 Conditions 3 and 5.

Pollutant	lb/hr	tpy (combined)
PM	23.5 *	1.8
Acetaldehyde	1.1	3.2
Acrolein	0.2	0.5
Benzene	0.1	0.2
Formaldehyde	3.1	2.5
Hydrogen Chloride	0.4	0.6
Lead	0.1	0.1
Manganese	0.1	0.1
Methanol	5.5	16.8
Phenol	7.0	2.2
Styrene	0.1	0.1

* total lb/charge

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 160 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

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each individual month's data shall be submitted in accordance with General Provision 7.

5. 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 burn more than 60 million cubic feet of natural gas per consecutive twelve month period in the direct fired kilns (3) of SN-01.
6. 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 5. 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.

SN-08

Erie City Boiler

Source Description

Georgia - Pacific Corporation - El Dorado Sawmill
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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 is not subject to the provisions of 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*.

Specific Conditions

7. 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 9 and 11.

Pollutant	lb/hr	tpy
PM ₁₀	27.6	120.6
SO ₂	2.4	10.4
VOC	3.5	15.3
CO	122.7	536.0
NO _x	15.5	67.5

8. 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 9 and 11.

Pollutant	lb/hr	tpy
PM	27.6	120.6

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Pollutant	lb/hr	tpy
Acrolein	0.4	1.7
Arsenic	0.01	0.1
Benzene	0.4	1.7
Cadmium	0.01	0.1
Hydrogen Chloride	1.8	7.7
Lead	0.1	0.1
Manganese	0.2	0.7
Mercury	0.1	0.1
POM	0.1	0.1
Phenol	0.1	0.1
Styrene	0.2	0.8

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 used oil at SN-08 in excess of 1000 gallons per year.
10. 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 9. 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 §19.705 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 90,000 tons per year and 8,680 tons per month at SN-08.
12. 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

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month total and each individual month's data shall be submitted in accordance with General Provision 7.

13. 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 14.
14. 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. 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.

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.

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Specific Conditions

15. 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 compliance with Specific Conditions 17 and 19.

SN#	Pollutant	lb/hr	ton/yr
SN-09	PM ₁₀	2.2	6.2
SN-10	PM ₁₀	0.3	0.8
SN-11	PM ₁₀	0.3	0.8

16. 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 compliance with Specific Conditions 17 and 19.

SN#	Pollutant	lb/hr	ton/yr
SN-09	PM	2.2	6.2
SN-10	PM	0.3	0.8
SN-11	PM	0.3	0.8

17. 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 18.
18. 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. If visible emissions which appear to be in excess

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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.
19. 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 operate each cyclone (SN-09, 10, &11) more than 5600 hours per consecutive twelve month period.
20. 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 19. 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.

SN-F-01
Unpaved Roads

Source Description

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

Specific Conditions

21. 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

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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 ₁₀	344	63

22. 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

23. 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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SCENARIO 2: Installation of Two New Kilns

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	30.4 ¹	309.2	N/A
		PM ₁₀	30.4 ¹	197.2	
		SO ₂	2.5	10.5	
		VOC	3.5 ¹	319.3	
		CO	124.1	538.5	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
		NO _x	17.2	70.5	
		Lead	0.2	0.2	
		Acetaldehyde	2.1	3.2	
		Acrolein	0.8	2.2	
		Benzene	0.5	1.9	
		Formaldehyde	6.5	2.5	
		Hydrogen Chloride	2.2	8.3	
		Manganese	0.3	0.8	
		Methanol	11.0	16.8	
		Phenol	1.6	2.3	
		Styrene	0.3	0.9	
		Arsenic	0.01	0.1	
		Cadmium	0.01	0.1	
		Mercury	0.1	0.1	
		POM	0.1	0.1	
01	Lumber Kilns	PM	32.3 ²	1.8	39
		PM ₁₀	32.3 ²	1.8	
		SO ₂	0.1	0.1	
		VOC	5572 ²	304.0	
		CO	1.4	2.5	
		NO _x	1.7	3.0	
		Acetaldehyde	2.1	3.2	
		Acrolein	0.4	0.5	
		Benzene	0.1	0.2	
		Formaldehyde	6.5	2.5	
		Hydrogen Chloride	0.4	0.6	
		Lead	0.1	0.1	
		Manganese	0.1	0.1	
		Methanol	11.0	16.8	
		Phenol	1.5	2.2	
		Styrene	0.1	0.1	
02-07	Reserved.				
		PM	27.6	120.6	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Ref. Page
			lb/hr	tpy	
08	Eric City Boiler	PM ₁₀	27.6	120.6	42
		SO ₂	2.4	10.4	
		VOC	3.5	15.3	
		CO	122.7	536.0	
		NO _x	15.5	67.5	
		Acrolein	0.4	1.7	
		Arsenic	0.01	0.1	
		Benzene	0.4	1.7	
		Cadmium	0.01	0.1	
		Hydrogen Chloride	1.8	7.7	
		Lead	0.1	0.1	
		Manganese	0.2	0.7	
		Mercury	0.1	0.1	
		POM	0.1	0.1	
		Phenol	0.1	0.1	
		Styrene	0.2	0.8	
09	Planer Mill Cyclone 1	PM	2.2	9.6	45
		PM ₁₀	2.2	9.6	
10	Planer Mill Cyclone 2	PM	0.3	1.1	45
		PM ₁₀	0.3	1.1	
11	Shavings Bin Cyclone	PM	0.3	1.1	45
		PM ₁₀	0.3	1.1	
F-01	Unpaved Roads ³	PM	956	175	47
		PM ₁₀	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.

SECTION III: PERMIT HISTORY

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

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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 renumbered 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 emissions 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.

Permit #703-AOP-R0 was issued on April 17, 2000. This was the initial Title V permit for the facility. The changes in emissions from the facility's last permit came from revised emission factors and the inclusion of fugitive emissions. There were no changes in the method of operation with the issuance of this permit.

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SECTION IV: EMISSION UNIT INFORMATION

Georgia - Pacific Corporation - El Dorado Sawmill
Permit #:703-AOP-R1
CSN #: 70-0032

SN-01
Lumber Kilns

Source Description

Rough boards and lumber that have 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

24. 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 26 and 28.

Pollutant	lb/hr	tpy (combined)
PM ₁₀	32.3*	1.8
SO ₂	0.1	0.1
VOC	5572*	304.0
CO	1.4	2.5
NO _x	1.7	3.0

* total lb/charge

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25. 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 26 and 28.

Pollutant	lb/hr	tpy (combined)
PM	32.3*	1.8
Acetaldehyde	2.1	3.2
Acrolein	0.4	0.5
Benzene	0.1	0.2
Formaldehyde	6.5	2.5
Hydrogen Chloride	0.4	0.6
Lead	0.1	0.1
Manganese	0.1	0.1
Methanol	11.0	16.8
Phenol	1.5	2.2
Styrene	0.1	0.1

* total lb/charge

26. 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 160 million board feet of lumber per consecutive twelve month period at SN-01.
27. 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 26. 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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28. 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 burn more than 60 million cubic feet of natural gas per consecutive twelve month period in the direct fired kilns (3) of SN-01.
29. 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 28. 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 is not subject to the provisions of 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*.

Specific Conditions

30. 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 32 and 34.

Pollutant	lb/hr	tpy
PM ₁₀	27.6	120.6
SO ₂	2.4	10.4
VOC	3.5	15.3
CO	122.7	536.0
NO _x	15.5	67.5

31. 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 32 and 34.

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Pollutant	lb/hr	tpy
PM	27.6	120.6
Acrolein	0.4	1.7
Arsenic	0.01	0.1
Benzene	0.4	1.7
Cadmium	0.01	0.1
Hydrogen Chloride	1.8	7.7
Lead	0.1	0.1
Manganese	0.2	0.7
Mercury	0.1	0.1
POM	0.1	0.1
Phenol	0.1	0.1
Styrene	0.2	0.8

32. 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.
33. 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 32. 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.
34. 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 90,000 tons per year and 8,680 tons per month at SN-08.
35. 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

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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.

36. 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 37.
37. 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. 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.

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

Source Description

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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

38. 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 ₁₀	2.2	9.6
SN-10	PM ₁₀	0.3	1.1
SN-11	PM ₁₀	0.3	1.1

39. 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	2.2	9.6
SN-10	PM	0.3	1.1
SN-11	PM	0.3	1.1

40. 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 41.

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41. 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. 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.

SN-F-01
Unpaved Roads

Source Description

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

Specific Conditions

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42. 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 ₁₀	344	63

43. 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

44. 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.

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 or 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 or within 180 days of permit issuance if no date is specified. 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.

Acid Rain (Title IV)

7. Pursuant to §26.701 of Regulation #26 and 40 CFR 70.6(a)(4), the permittee is prohibited from causing any emissions which exceed any allowances that the source lawfully holds under Title IV of the Act or the regulations promulgated thereunder. No permit revision is required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. This permit establishes no limit on the number of allowances held by the permittee. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement of this permit or the Act. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Act.

Title VI Provisions

8. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
9. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.

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- c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
10. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
11. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.
12. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 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 ¹	#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	
E-01	Sawmill Hog	#26 Group C	These sources were submitted for investigation and have received approval to be classified as exempt sources by
E-02	Planer Hog	#26 Group C	

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			ADPC&E.
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1 - AST > Aboveground Storage Tank.

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, 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.

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 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 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000, 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 §26.406 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 CFR 70.6(a)(1)(ii) and §26.701(A)(2) 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 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;

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- c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) 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 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) 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 CFR 70.6(a)(3)(iii)(B), §26.701(C)(3)(b) 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 discovery of the occurrence. The initial report may be made by telephone and shall include:
- a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,

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- e. The duration of the deviation,
- f. The average emissions during the deviation,
- g. The probable cause of such deviations,
- h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
- i. The name of the person submitting the report.

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

- 9. Pursuant to 40 CFR 70.6(a)(5) and §26.701(E) 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 CFR 70.6(a)(6)(i) and §26.701(F)(1) 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 CFR 70.6(a)(6)(ii) and §26.701(F)(2) of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 12. Pursuant to 40 CFR 70.6(a)(6)(iii) and §26.701(F)(3) of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a

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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 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.701(F)(5) 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 CFR 70.6(a)(7) and §26.701(G) of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.701(H) 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 CFR 70.6(a)(9)(i) and §26.701(I)(1) 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 CFR 70.6(b) and §26.702(A) and (B) 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 CFR 70.6(c)(1) and §26.703(A) 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 CFR 70.6(c)(2) and §26.703(B) of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 CFR 70.6(c)(5) and §26.703(E)(3) of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.704(C) of Regulation #26, nothing in this permit shall alter or affect the following:

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