

ADEQ OPERATING AIR PERMIT

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

Permit No. : 0703-AOP-R2

IS ISSUED TO:

**Georgia-Pacific Corp. Sawmill
El Dorado, AR 71730
Union County
AFIN: 70-00032**

**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

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date Modified

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Table 1 - List of Acronyms

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

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Section I: FACILITY INFORMATION

PERMITTEE: Georgia Pacific Corp. Sawmill

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PERMIT NUMBER: 0703-AOP-R2

FACILITY ADDRESS: Highway 167 South
5482 Junction City Hwy
El Dorado, AR 71730


MAILING ADDRESS: P.O. Box 1511
El Dorado, Arkansas 71730

COUNTY: Union

CONTACT POSITION: Robert D. Hanry

TELEPHONE NUMBER: (870) 863-4182

REVIEWING ENGINEER: Melisha Griffin

UTM North - South (Y): Zone  3,666

UTM East - West (X): Zone 15 534

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Section II: INTRODUCTION

Summary of Permit Activity

Georgia-Pacific Corporation (G-P) currently operates a lumber sawmill near El Dorado (Union County), Arkansas. The facility operates under North American Industry Classification System (NAICS) number 321113 (e.g. sawmill).

In this modification, the facility is requesting to increase the natural gas limit for the lumber kilns from 60 million cubic feet per year (MMcf/yr) to 80 MMcf/yr. This will allow for more flexibility while maintaining the facility-wide lumber production limit. The small increase in natural gas usage will result in increases in CO and NO_x, 1.0 tpy and 1.4 tpy respectively. All other pollutants were either unaffected or the changes in emissions were minor (e.g.: the increase in SO₂ was 0.024 tpy).

The facility also stated via phone conversation that they no longer plan to implement the previous modification which allowed for the addition of two new kilns. Therefore, the alternate operating scenario, entitled “Scenario 2: Installation of Two New Kilns,” has been deleted from the permit.

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).

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,

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generated by the trim saws, are hogged and are also pneumatically conveyed to the shavings bin via the same three cyclones.

Regulations

The following table contains the regulations applicable to this permit.

Table 2 - Regulations

Source No.	Regulation Citations
Facility	Arkansas Air Pollution Control Code (Regulation #18)
Facility	Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19)
Facility	Regulations of the Arkansas Operating Air Permit Program (Title V, Regulation #26)

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

Table 3 – Emission Summary

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross 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	539.5	
		NO _x	17.2	71.9	
		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	

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01	Lumber Kilns	PM	23.5 ²	1.8	13
		PM ₁₀	23.5 ²	1.8	
		SO ₂	0.1	0.1	
		VOC	4052.4 ²	304.0	
		CO	1.4	3.5	
		NO _x	1.7	4.4	
		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	
08	Eric City Boiler	PM	27.6	120.6	16
		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	
		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	19
		PM ₁₀	2.2	6.2	
10	Planer Mill Cyclone 2	PM	0.3	0.8	19
		PM ₁₀	0.3	0.8	
11	Shavings Bin Cyclone	PM	0.3	0.8	19
		PM ₁₀	0.3	0.8	
F-01	Unpaved Roads ³	PM	956	175	21
		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.

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

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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 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.

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.

In permit # 0703-AOP-R1, Georgia-Pacific proposed to increase production/throughput beyond

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the limits that were established in the earlier permit. Seven lumber drying kilns were already 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 were two possible scenarios being considered for increasing production. One scenario involved maintaining the existing seven kilns and just establishing a higher production level of 160 million board feet annually. This same scenario would have increased 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 involved 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. At the time of the request, the final decision had not been made regarding which scenario was to be implemented. Based on the information obtained from the application, the permit was 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).

The changes in emissions resulted in the facility undergoing PSD review Prevention of Significant Deterioration.

BACT ANALYSIS

As a part of the PSD review for Georgia-Pacific, a Best Available Control Technology (BACT) analysis was required.

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.

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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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Section IV: SPECIFIC CONDITIONS

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.

Table 4– Maximum Criteria Emission Rates for SN-01

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	3.5
NO _x	1.7	4.4

*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 Condition 3 and 5.

Table 5– Maximum Non-Criteria Emission Rates for SN-01

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 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 80 million cubic feet of natural gas per consecutive twelve month period in the direct fired kilns (3) of SN-01.

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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.

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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

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.

Table 6– Maximum Criteria Emission Rates for SN-08

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

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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.

Table 7– Maximum Non-Criteria Emission Rates for SN-08

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

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.

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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 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.

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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

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.

Table 8– Maximum Criteria Emission Rates for SN-09, 10 and 11

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.

Table 9– Maximum Non-Criteria Emission Rates for SN-09, 10 and 11

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.

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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 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.

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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

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 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.

Table 10– Maximum Criteria Emission Rates for SN-F-01

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.

Table 11– Maximum Non-Criteria Emission Rates for SN-F-01

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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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.

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Section VI: PLANT WIDE CONDITIONS

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

Title VI Provisions

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

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- 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 must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
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.

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

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

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 Table 7 - Applicable Regulations of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated July 17, 2003.

Table 12 - Applicable Regulations

Source No.	Regulation	Description
Facility	19	Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19)
Facility	26	Regulations of the Arkansas Operating Air Permit Program (Title V, Regulation #26)

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated July 17, 2003.

Table 13 - Inapplicable Regulations

Source No.	Regulation	Description
08	40 CFR Part 60, Subpart Dc	<i>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.</i>

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Section VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated August 12, 1996



Table 14 - Insignificant Activities

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 ADPC&E.
E-02	Planer Hog	#26 Group C	

1 - AST > Aboveground Storage Tank.

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

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Section VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.[40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation No. 26 §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

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

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

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. The permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include: [40 CFR 70.6(a)(3)(iii)(B), Regulation #26 §26.701(C)(3)(b), and Regulation #19 §19.601 and §19.602]
 - a. The facility name and location
 - b. The process unit or emission source deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,
 - e. The duration of the deviation,
 - f. The average emissions during the deviation,
 - g. The probable cause of such deviations,
 - h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - i. The name of the person submitting the report.

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The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]
11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]
14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]

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16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]
17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]
 - a. The identification of each term or condition of the permit that is the basis of the certification;

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

22. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]

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

23. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]