

ADEQ OPERATING AIR PERMIT

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

Permit No. : 0703-AOP-R4

IS ISSUED TO:
Georgia-Pacific Corporation - El Dorado Sawmill
Highway 167 South
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:

May 20, 2005

AND

May 19, 2010

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

Signed:

Mike Bates
Chief, Air Division

Date Modified

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM10	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Georgia-Pacific Corporation - El Dorado Sawmill

AFIN: 70-00032

PERMIT NUMBER: 0703-AOP-R4

FACILITY ADDRESS: Highway 167 South
El Dorado, AR 71730

MAILING ADDRESS: 5482 Junction City Highway
El Dorado, Arkansas 71731-1511

COUNTY: Union

CONTACT POSITION: Robert Hanry, Mill Manager

TELEPHONE NUMBER: (870) 863-4182

REVIEWING ENGINEER: Karen Cerney

UTM North South (Y): Zone 15: 3,666.10

UTM East West (X): Zone 15: 534.00

SECTION II: INTRODUCTION

Summary of Permit Activity

Georgia-Pacific Corporation – El Dorado (GP El Dorado) owns and operates a southern pine sawmill near El Dorado, Union County, Arkansas. GP El Dorado is located approximately six miles south of El Dorado, Arkansas, along U.S. Highway 167. This minor modification permit is being issued to allow the permittee to install a dry electrostatic precipitator (ESP) as a control device for the wood boiler (SN-08). The installation is in compliance with CAO LIS# 06-026. This modification also added a specific condition requiring the facility to submit a permit modification bringing the facility into compliance with 40 CFR Part 63 Subpart DDDDD. The proposed changes result in emission decreases of 79.8 ton per year (tpy) of PM/PM₁₀.

Process Description

Incoming logs are typically stored on-site prior to processing. Oversized or crooked logs are cut to length by the bucksaw prior to entering the debarker. Some logs pass directly through the buck saw without being cut and pass 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 to be burned in 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. The 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 cooling sheds before either being processed in the planer mill or shipped off-site.

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 cyclones (SN-09, SN-10, and SN-11) in series, to a shavings bin prior to off-site 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

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
40 CFR 63 Subpart DDDD – <i>National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products*</i>
40 CFR 63 Subpart DDDDD – <i>National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters**</i>

*A permit modification to address compliance must be submitted not later than 6 months prior to the effective date of the subpart. See Specific Condition 7.

** A permit modification to address compliance must be submitted no later than 180 days prior to final compliance date. See Specific Condition 16.

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

Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	56.3	237.4
		PM ₁₀	25.6	105.4
		SO ₂	2.5	10.5
		VOC	102.1	319.6
		CO	124.1	539.4
		NO _x	17.2	71.5
HAPs		Acetaldehyde*	1.01	3.12
		Acrolein*	0.54	2.10
		Arsenic	0.01	0.01
		Benzene*	0.39	1.71
		Cadmium	0.01	0.01

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		HCl	1.77	7.70
		Lead	0.01	0.01
		Manganese	0.15	0.65
		Methanol*	5.50	16.80
		Mercury	0.01	0.01
		POM*	0.01	0.02
		Phenol*	0.71	2.18
		Styrene*	0.18	0.77
		Benzo(a)pyrene*	0.01	0.01
		Formaldehyde*	1.19	4.19
		Beryllium	0.01	0.01
		Chlorine*	0.08	0.32
		Hexavalent Chromium	0.01	0.01
01	Lumber Kilns	PM	0.6	1.8
		PM ₁₀	0.6	1.8
		SO ₂	0.1	0.1
		VOC	98.6	304.3
		CO	1.4	3.4
		NO _x	1.7	4.0
		Acetaldehyde	1.01	3.12
		Acrolein	0.16	0.48
		Formaldehyde	0.78	2.40
		Methanol	5.50	16.80
		Phenols	0.70	2.16
08	Erie City Boiler	PM	9.3	40.8
		PM ₁₀	9.3	40.8
		SO ₂	2.4	10.4
		VOC	3.5	15.3
		CO	122.7	536.0
		NO _x	15.5	67.5
		Acrolein	0.38	1.62
		Arsenic	0.01	0.01
		Benzene	0.39	1.71
		Cadmium	0.01	0.01
		HCl	1.77	7.70
		Lead	0.01	0.01
		Manganese	0.15	0.65
		Mercury	0.01	0.01
		POM	0.01	0.02
		Phenol	0.01	0.02

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		Styrene	0.18	0.77
		Benzo(a)pyrene	0.01	0.01
		Formaldehyde	0.41	1.79
		Beryllium	0.01	0.01
		Chlorine	0.08	0.32
		Hexavalent Chromium	0.01	0.01
09	Planer Mill Cyclone 1	PM	2.2	6.2
		PM ₁₀	2.2	6.2
10	Planer Mill Cyclone 2	PM	0.3	0.8
		PM ₁₀	0.3	0.8
11	Shavings Bin Cyclone	PM	0.3	0.8
		PM ₁₀	0.3	0.8
F-01	Unpaved Roads and Debarker	PM	43.6	187
		PM ₁₀	12.9	55.0

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

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 multicclone 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.

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

Permit 0703-AOP-R2 was issued on July 19, 2004. The natural gas limit for the lumber kilns was increased from 60 million cubic feet per year (MMcf/yr) to 80 MMcf/yr. The increase allowed GP-El Dorado more flexibility while maintaining the facility-wide lumber production limit.

There were no physical modifications to the process; however, previous permits established limitations on the new equipment to avoid PSD review. The modifications performed at the time 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; therefore, there were no emission units reviewed for BACT.

During the permitting process it was determined by GP El Dorado, that an alternate operating scenario, the installation of two new kilns, was no longer being pursued and was removed from the permit.

Permit 0703-AOP-R3 was issued on May 20, 2005. The facility had submitted an application for a Title V Renewal in accordance with Regulation 26 – *Regulations of the Arkansas Operating Air Permit Program*. Permitted PM emission increases occurred due to the accounting for a previously un-permitted log debarker.

SECTION IV: SPECIFIC CONDITIONS

SN-01 Lumber Kilns

Source Description

Rough boards and lumber that have been purchased off-site 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 (1) low temperature steam kiln. Steam, for the steam fired kilns, is provided by the Erie City boiler (SN-08).

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition 5 and Plantwide Condition 7. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.6	1.8
SO ₂	0.1	0.1
VOC	98.6	304.3
CO	1.4	3.4
NO _x	1.7	4.0

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition 5 and Plantwide Condition 7. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.6	1.8
Acetaldehyde	1.01	3.12
Acrolein	0.16	0.48
Formaldehyde	0.78	2.4
Methanol	5.5	16.80

Pollutant	lb/hr	tpy
Phenols	0.70	2.16

3. Visible emissions at the direct fired kilns may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this Specific Condition shall be demonstrated through compliance with Specific Condition 4.

SN	Limit	Regulatory Citation
SN-01	5%	§18.501 and A.C.A.

4. The permittee shall use natural gas only to fuel the direct fired kilns at SN-01. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The facility shall not exceed more than a total of 80 million cubic feet of natural gas at the direct fired kilns in any consecutive 12 month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]
6. The permittee shall maintain records that demonstrate compliance with the limits set in Specific Condition 5 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
7. The permittee shall submit an application to address all applicable requirements of 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products Manufacture, 6 months prior to the effective date of October 1, 2007. [Regulation No. 26 §26.1011 (A)(1)]

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 is capable of burning wood, used oil generated on-site, and oil 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 followed by an ESP. The ESP will be installed and fully operational by August 1, 2006. Phase 1 is the boiler with the Multiclone; Phase 2 is the boiler with the Multiclone followed by an ESP. The boiler was removed from another sawmill and re-installed at El Dorado (1983). The boiler was installed prior to June 9, 1989 and therefore 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

8. The permittee shall not exceed the emission rates set forth in the following tables. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 10, 12, and 14 during phase 1 and Specific Conditions 10, 12, 14, 15, 16, 17, and 19 during Phase 2. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Criteria Pollutants for Phase 1

Pollutant	lb/hr	tpy
PM ₁₀	43.4	179.6
SO ₂	2.4	10.4
VOC	3.5	15.3
CO	122.7	536.0
NO _x	15.5	67.5

Criteria Pollutants for Phase 2

Pollutant	lb/hr	tpy
PM ₁₀	9.3	40.8
SO ₂	2.4	10.4
VOC	3.5	15.3
CO	122.7	536.0
NO _x	15.5	67.5

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 10, 12, and 14 during Phase 1 and Specific Conditions 10, 12, 14, 15, 16, 17, and 19 during Phase 2. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Non-Criteria Pollutants for Phase 1

Pollutant	lb/hr	tpy
PM	43.4	179.6
Acrolein	0.38	1.62
Arsenic	0.01	0.01
Benzene	0.39	1.71
Cadmium	0.01	0.01
HCl	1.77	7.70
Lead	0.01	0.01
Manganese	0.15	0.65
Mercury	0.01	0.01
POM	0.01	0.02
Phenol	0.01	0.02
Styrene	0.18	0.77
Benzo(a)pyrene	0.01	0.01
Formaldehyde	0.41	1.79
Beryllium	0.01	0.01
Chlorine	0.08	0.32
Hexavalent Chromium	0.01	0.01

Non-Criteria Pollutants for Phase 2

Pollutant	lb/hr	tpy
PM	9.3	40.8
Acrolein	0.38	1.62

Pollutant	lb/hr	tpy
Arsenic	0.01	0.01
Benzene	0.39	1.71
Cadmium	0.01	0.01
HCl	1.77	7.70
Lead	0.01	0.01
Manganese	0.15	0.65
Mercury	0.01	0.01
POM	0.01	0.02
Phenol	0.01	0.02
Styrene	0.18	0.77
Benzo(a)pyrene	0.01	0.01
Formaldehyde	0.41	1.79
Beryllium	0.01	0.01
Chlorine	0.08	0.32
Hexavalent Chromium	0.01	0.01

10. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated through compliance with Specific Condition 11.

SN	Limit	Regulatory Citation
08	20%	§19.503 and 40 CFR 52, Subpart E

11. 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.
12. The facility shall not exceed more than a total of 1,000 gallons of used oil in any consecutive 12 month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]
13. The permittee shall maintain records that demonstrate compliance with the limits set in Specific Condition 12 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7.
14. The permittee shall conduct stack emissions testing on the wood fired boiler (SN-08) to measure the following pollutants by the indicated US EPA Reference Test Method as published in 40 CFR Part 60 Appendix A. [§19.702 of Regulation 19 and 40 CFR Part 52 Subpart E]

Pollutant	EPA Test Method
PM	5 and 202
PM ₁₀	201A and 202 or 5 and 202*
CO	10

*By using Method 5 and 202 for PM₁₀, the facility will assume all collected particulate is PM₁₀.

The facility shall perform this testing every 5 years from the date of the last successful test. If at any time the facility fails one of the 5-year tests, or the facility conducts additional modifications to either boiler, then the facility must conduct two successive annual tests. If both of these annual tests are successful, then the facility may return to the five-year testing schedule.

All tests shall be conducted with the boiler operating at 90% or greater of capacity. Failure to test at or above this level shall limit the permittee to operating within 10% above the tested rate. The ADEQ Air Division Compliance Inspector Supervisor shall be notified at least 15 days prior to the testing. Results of all testing shall be submitted to the address indicated in General Provision #7.

15. The ESP shall be installed and fully operational by August 1, 2006. Once the ESP is functional, the permittee shall comply with the Phase 2 emission limits and specific conditions. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. The ESP shall be operated at all times while the wood fired boiler is combusting fuel. [§19.703 of Regulation No. 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. The permittee will perform initial tests on the boiler with the ESP operational while the source is operating at or above 90% of rated capacity using EPA Reference Methods 5 and 202 for PM and 201A and 202 or 5 and 202 for PM₁₀. By using method 5 and 202 for PM₁₀, the permittee will assume all collected particulate is PM₁₀. These tests will be performed in accordance with Plantwide Condition #3. Failure of these initial tests (not any subsequent retests) will require the permittee to retest the boiler within 45 days of the failed test. Test results will be maintained on-site, made available to Department personnel upon request, and will be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]
18. Prior to March 13, 2007, the permittee will submit an application to the Department which addresses all applicable requirements of 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters. [Regulation No. 26 §26.1011 (A)(1)]

CAM Requirements

19. The Erie Boiler (SN-08) is subject to Compliance Assurance Monitoring and shall comply with all applicable provisions, including but not limited to: [§19.703 of Regulation No. 19, 40 CFR Part 52 Subpart E, and Part §64.6]
 - a. Once the permittee has established compliance with the 9.3 lb/hr PM/PM₁₀ emission rate limit in Specific Conditions 1 and 2, the total voltage, which is the sum of the secondary voltage in each field, measured at the satisfactory test event will be established as the minimum operating voltage for continuous compliance.
 - b. The permittee shall continuously monitor secondary voltage. The secondary voltage will be used to determine total voltage at least once every 15 minutes and will be recorded as a 3-hr block average.
 - c. The permittee will confirm the voltmeter reads zero when the unit is not operating.
20. The permittee will maintain records demonstrating compliance with Specific Condition 19. These records shall be kept on site, and shall be made available to Department personnel upon request. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]
21. If the 3-hr block average total voltage is below the minimum voltage established in Specific Condition 19, it will be considered an excursion. The permittee will

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immediately take action to identify the cause of any excursion, implement corrective action, and document that total voltage was not below the minimum following the corrective action. The permittee shall record any excursions and submit excess emission reports for any excess emissions. The records will be kept on site for at least two years. A report will be submitted to the Department in accordance with General Provision #7. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]

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 Georgia Pacific's Planer Mill. SN-10 is designated for the facility's Planer Mill Cyclone2. SN-11 is designated for the facility's Shavings Bin Cyclone.

Specific Conditions

22. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Plantwide Condition 7. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Source	Pollutant	lb/hr	tpy
09	PM ₁₀	2.2	6.2
10	PM ₁₀	0.3	0.8
11	PM ₁₀	0.3	0.8

23. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Plantwide Condition 7. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Source	Pollutant	lb/hr	Tpy
09	PM	2.2	6.2
10	PM	0.3	0.8
11	PM	0.3	0.8

24. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated through compliance with Specific Condition 25.

SN	Limit	Regulatory Citation
09, 10, and 11	20%	§19.503 and 40 CFR 52, Subpart E

25. Daily observations of the opacity from SN-09, SN-10, and SN-11 will 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. [Regulation No. 19 §19.503 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

- e. The date and time of the observation.
 - f. If visible emissions which appeared to be above the permitted limit were detected.
 - g. 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.
 - h. The name of the person conducting the opacity observations.
26. The permittee shall operate each cyclone (SN-09, SN-10, and SN-11) at all times when the Planer Mill and Shavings Bin are in operation. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E].

SN-F-01
Unpaved Roads and Debarker

Source Description

SN-F-01 is designated for Georgia Pacific's unpaved roads and debarker.

Specific Conditions

27. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 29 and 30. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	12.9	55.0

28. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions 29 and 30. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	43.6	187.0

29. The permittee shall water all unpaved roads as necessary to assure that unnecessary amounts of air contaminants do not become airborne. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].
30. The facility shall not exceed more than a total of 1,168,000 tons/yr of logs at the debarker in any consecutive 12 month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E].
31. The permittee shall maintain records that demonstrate compliance with the limits set in Specific Condition 30 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site and shall be made available to Department personnel upon request. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision 7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

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

Plantwide Limits

7. The facility shall not exceed more than a total of 160 million board feet (MMBF) of kiln dried lumber in any consecutive 12 month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E].

8. The permittee shall maintain records that demonstrate compliance with Plantwide Condition 7 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Title VI Provisions

9. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
 - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
10. 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.

11. 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.
12. 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.

13. 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.

Permit Shield

14. 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 the following table of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated October 12, 2004.

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 October 12, 2004.

Inapplicable Regulations

Source No.	Regulation	Description
08	40 CFR Part 60, Subpart Dc	<i>Standards of Performance for Small</i>

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Source No.	Regulation	Description
		<i>Industrial-Commercial-Institutional Steam Generating Units.</i>

SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated October 12, 2004.

Description	Category
Bark Hog	A-13
Planner Mill Hog	A-13
Bucking Saws	A-13
84" Green Chipper	A-13
70" Block Green Chipper	A-13
60" Green Lumber Reject Chipper	A-13

SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective 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 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample,

measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

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

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

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

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

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

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

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

- along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
 16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
 17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
 18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
 19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
 20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
 21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also

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

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