ADEQ
OPERATING
AIR PERMIT

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

Permit #: 1177-AOP-R1

IS ISSUED TO:

Georgia-Pacific Resins, Inc.
Highway 82 and Paper Mill Road
Crossett, AR 71635
Ashley County
CSN: 02-0028

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:

August 13, 2001 and August 12, 2006

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

_____ February 21, 2003

Keith A. Michaels Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE:	Georgia-Pacific Resins, Inc.
CSN:	02-0028
PERMIT NUMBER:	1177-AOP-R1
FACILITY ADDRESS:	Highway 82 and Paper Mill Road Crossett, AR 71635
COUNTY:	Ashley
CONTACT POSITION:	Darrell Cavin
TELEPHONE NUMBER:	(870) 567-7272
REVIEWING ENGINEER:	Charles Hurt
UTM North-South (X):	3667.0
UTM East-West (Y):	596.3
	Zone 15

SECTION II: INTRODUCTION

Summary of Permit Activity

Georgia-Pacific Resins, Inc.(GPRI), a subsidiary of Georgia-Pacific Corporation, operates a resin, formaldehyde, and tall oil manufacturing facility located at Highway 82 and Paper Mill Road in Crossett, Arkansas. GPRI submitted an application on August 9, 2002 requesting to increase the hourly VOC emission rate to 3.0 lb/hr batch average and reduce the hours of operation to 4,400 hr/year for the CTO cooker (SN-12). The facility is not increasing the annual VOC emissions at SN-12. GPRI later submitted an application to construct a 835,000 gallon tank (SN-40) to store crude tall oil (CTO). The emissions from the new tank will be 0.1 lb/hr and 0.4 tpy of VOC. The semiannual reporting requirements have been removed from Specific Conditions 5, 36, and 105.

Process Description

Georgia-Pacific Resins, Inc. is one of four Georgia-Pacific Corporation facilities in Crossett. The manufacturing complex of GPRI consists of five distinct operating plants which are listed below. Two of the plants are made-up of several individual operations.

1. Tall Oil Manufacturing Plant
    a. Tall Oil Fractional (TOFRAC) Plant
    b. Rosin Size Plant
    c. Rosin Derivatives and Hot Flake Derivatives Plant
    d. Dispersed Size Plant

2. Liquid Resin Manufacturing Plant
    a. PF Resin Manufacturing
    b. UF Resin Manufacturing
    c. Wet Strength Resin Manufacturing
    d. Novacote Resin Manufacturing
    e. Resi-Mix Resin Manufacturing

3. Spray Dry Resin Manufacturing

4. Formaldehyde and Urea Formaldehyde Concentrate (UFC) Manufacturing Plant

5. Crude Tall Oil Acidulation Plant

Georgia-Pacific Resins, Inc.
Permit #: 1177-AOP-R1
CSN #: 02-0028

Regulations

This facility is subject to the following regulations: Regulation 18, *Arkansas Air Pollution Control Code*; Regulation 19, *Regulations of the Arkansas Plan of Implementation for Air Pollution Control*; 40 CFR Part 60, New Source Performance Standards, Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, Subpart Kb - *Standards of Performance for Volatile Organic Liquid Storage Vessels*; and 40 CFR Part 63, Subpart F - *National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry,* Subpart G - *National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater*, Subpart H - *National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks,* Subpart W - *National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non - Nylon Polyamides Production,* Subpart SS - *National Emission Standard for Closed Vent Systems, Control Devices, Recovery Devices and Pouting to a Fuel Gas System or a Process,* Subpart UU - *National Emission Standards for Equipment Leaks - Control Level 2 Standards*, Subpart WW, *National Emission Standards for Storage Vessels (Tanks)- Control Level 2,* Subpart OOO - *National Emission Standards for Hazardous Air Pollutants for Amino/Phenolic Resins Production.*

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

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
Total Allowable Emissions			PM	89.5	391.1	
			PM_{10}	89.5	391.1	
			SO_2	34.9	151.7	
			VOC	55.1	182.7	
			CO	23.0	97.6	
			NO_x	35.0	143.1	
			H_2S	0.3	1.3	
			H_2SO_4	0.1	0.4	
			Iodine	7.4	1.0	

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
			HAPs			
			Formaldehyde	11.0	22.4	
			Phenol	5.4	14.5	
			Methanol	7.7	16.0	
			Epichlorohydrin	0.1	0.4	
			O-Cresol	0.2	0.8	
			Maleic Anhydride	7.4	2.5	
SN-01	HOH-1	Hot Oil Heater for TOFRAC Plant (43.6 MM BTU/hr)	PM	0.6	2.6	66
			PM_{10}	0.6	2.6	
			SO_2	0.1	0.4	
			VOC	0.3	1.3	
			CO	1.5	6.6	
			NO_x	6.1	26.7	
SN-03	BH-4	Spray Dry Resin Process and Process Heater (10.0 MM BTU/hr)	PM	22.2	97.2	59
			PM_{10}	22.2	97.2	
			SO_2	0.1	0.4	
			VOC	14.9	65.1	
			CO	0.4	1.8	
			NO_X	1.4	6.1	
			Formaldehyde	7.2	10.1	
			Phenol	2.3	31.5	
			Methanol	5.3	23.2	
SN-05	B-1	Pitch Boiler/VOC Control System (94.1 MM BTU/hr)	PM	35.0	180.6	25
			sootblowing limit	85.0		
			PM_{10}	35.0	180.6	
			sootblowing limit	85.0		
			SO_2	10.5	46.0	
			VOC	4.6	20.1	
			CO	3.2	14.0	
			NO_X	13.2	57.8	

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
			Iodine	3.7	0.5	
SN-06	BH-5	Derivatives Plant Solids Addition Baghouse	PM PM_{10}	0.4 0.4	1.8 1.8	93
SN-07	HOH-2	Derivatives Plant Hot Oil Heater (5.2 MM BTU/hr)	PM PM_{10} SO_2 VOC CO NO_X	0.1 0.1 0.1 0.1 0.2 0.6	0.4 0.4 0.4 0.4 0.9 2.6	94
SN-09	BH-6	Derivatives Plant Flaker Bagging Sta.	PM PM_{10} VOC Maleic Anhydride	0.7 0.7 7.4 7.4	3.1 3.1 2.5 2.5	95
SN-10	OX-1	ICI Formaldehyde Process Oxidizer (2.0 MM BTU/hr)	PM PM_{10} SO_2 VOC CO NO_X Formaldehyde Methanol	0.2 0.2 0.1 1.7 0.2 0.9 0.4 1.3	0.9 0.9 0.4 7.7 0.9 3.9 1.8 5.9	63
SN-11	OX-2	RCI Oxidizer Emissions from UFC-Formaldehyde process, Resin kettles, Formaldehyde Storage tanks, UFC storage tanks,	PM PM_{10} SO_2 VOC CO NO_X Formaldehyde Phenol	0.1 0.1 0.1 2.0 4.7 0.5 0.3 0.1	0.4 0.4 0.4 8.8 20.6 2.2 1.0 0.4	28

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
		Methanol storage tank (4.8 MM BTU/hr)	Methanol Epichlorohydrin	0.9 0.1	3.9 0.4	
SN-12	SCRUB -1	Crude Tall Oil Acidulation Scrubber	PM PM_{10} SO_2 VOC H_2S H_2SO_4 Methanol	0.7 0.7 1.9 3.0* 0.3 0.1 0.2	3.1 3.1 8.3 6.6 1.3 0.4 0.9	79
SN-13	BH-2	Resi-Mix Process Feed System Baghouse	PM PM_{10}	0.1 0.1	0.4 0.4	38
SN-14	T-43	Tall Oil Fatty Acid Storage Tank 133,501 gal.	VOC	0.1	0.4	72
SN-15	T-44	Tall Oil Fatty Acid Storage Tank 80,737 gal.	VOC	0.1	0.4	72
SN-16	T-41	Crude Tall Oil Storage Tank 835,176 gal	VOC	0.1	0.4	68
SN-17	NC-1	Novacote Resin Storage Tank 32,130 gal	VOC	0.1	0.4	56
SN-18	BH-3	Resi-Mix Process Mixer	PM PM_{10}	0.1 0.1	0.4 0.4	39
SN-19	BH-1	Styrene - Maleic	PM	0.1	0.4	40

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
		Anhydride Feed Hoppers and Grinder	PM_{10}	0.1	0.4	
SN-20	T-42	Crude Tall Oil Storage Tank - 835,176 gal	VOC	0.1	0.4	68
SN-21	WS-4	Wet Strength Resin Storage Tank 30,932 gal	VOC	0.1	0.4	55
SN-22	WS-5	Wet Strength Resin Storage Tank 30,932 gal	VOC	0.1	0.4	55
SN-23	DS-1	Dry Strength Resin Storage Tank 30,932 gal	VOC	0.1	0.4	55
SN-24	T-21	Tall Oil Rosin Storage Tank - 25,366 gal	VOC	0.3	1.3	73
SN-25	T-63	Neutral Rosin Adduct Storage Tank 30,439 gal	VOC	0.1	0.4	84
SN-26	T-62	Dispersed Size Product Storage Tank 32,130 gal	VOC	0.1	0.4	87
SN-28	T-2	Dispersed Size Release Tank 4,134 gal	VOC	0.8	3.5	86
SN-29	R-1,	Rosin Size Disperser	VOC	0.8	3.5	85

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
	R-2	Vessels - 753 gal Ea.				
SN-30	P-11	PF Resin Storage Tank 21,138 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	47
SN-31	RM-7	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.1	0.4 0.4	49
SN-32	T-47	Pitch Storage Tank 75,159 gal	VOC	0.1	0.4	69
SN-33	T-20	Heads 2 Storage Tank 25,366 gal	VOC	0.1	0.4	71
SN-34	T-31	Heads 2 Storage Tank 25,366 gal	VOC	0.1	0.4	71
SN-35	T-49	Tall Oil Rosin Storage Tank - 146,795 gal	VOC	0.1	0.4	73
SN-36	T-26	501 Bottoms Storage Tank - 27,057 gal	VOC	0.1	0.4	74
SN-37	T-50	Rosin Druming Tank and Drumming Station 5,707 gal	VOC	0.1	0.4	77
SN-40	T-40	CTO Storage Tank 835,000 gal	VOC	0.1	0.4	68
SN-41	T-5	Dipro Rosin Storage	VOC	4.3	0.2	91

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
		Tank - 30,439 gal				
SN-42	T-6	Distilled Tall Oil Storage Tank - 30,439 gal	VOC	0.3	0.9	74
SN-43	T-24	Pitch Storage Tank 30,439 gal	VOC	0.1	0.4	69
SN-44	T-36	Pitch Storage Tank 18,602 gal	VOC	0.1	0.4	69
SN-45	T-19	Heads 2 Storage Tank 25,366 gal	VOC	0.1	0.4	71
SN-46	T-22	Tall Oil Fatty Acid Storage Tank 25,366 gal	VOC	0.1	0.4	72
SN-47	T-29	Heads 2 Storage Tank 25,366 gal	VOC	0.1	0.4	71
SN-48	T-17	Tall Oil Fatty Acid Storage Tank 25,366 gal	VOC	0.1	0.4	72
SN-49	T-18	Tall Oil Fatty Acid Storage Tank 25,366 gal	VOC	0.1	0.4	72
SN-50	T-25	502 Bottoms Storage Tank - 25,366 gal	VOC	0.1	0.4	74
SN-51	T-23	Distilled Tall Oil Storage Tank	VOC	0.1	0.4	75

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
		25,366 gal				
SN-52	T-7	Tall Oil Rosin Storage Tank - 25,366 gal	VOC	0.1	0.4	73
SN-53	T-8	Tall Oil Rosin Storage Tank - 25,366 gal	VOC	0.1	0.4	73
SN-54	T-9	Tall Oil Rosin Storage Tank - 29,934 gal	VOC	0.1	0.4	73
SN-55	T-10	Tall Oil Rosin Storage Tank - 25,366 gal	VOC	0.1	0.4	73
SN-56	T-12	Tall Oil Rosin Storage Tank - 25,366 gal	VOC	0.1	0.4	73
SN-57	T-48	Distilled Tall Oil Storage Tank 48,102 gal	VOC	0.1	0.4	75
SN-58	T-46	Tall Oil Fatty Acid Storage Tank 146,795 gal	VOC	0.1	0.4	72
SN-59	M-3	Phenol Process Water Storage Tank 11,274 gal	VOC Phenol	0.1 0.1	0.4 0.4	41
SN-60	M-5	Cresylic Acid Storage Tank -	VOC O-Cresol	0.1 0.1	0.4 0.4	42

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
		21,138 gal				
SN-61	M-6	Phenol Heavy Layer Distillate Storage Tank 23,487 gal	VOC Phenol	0.1 0.1	0.4 0.4	43
SN-62	M-8	Phenol Storage Tank 133,501 gal	VOC Phenol	0.6 0.6	2.6 2.6	44
SN-63	P-8	Pre-Polymer Storage Tank - 8,455 gal	VOC	0.1	0.4	45
SN-64	M-15	DETA Storage Tank 8,455 gal	VOC	0.1	0.4	46
SN-65	M-17	Pre-Polymer Storage Tank - 8,455 gal	VOC	0.1	0.4	45
SN-66	P-1	PF Resin Storage Tank 14,680 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	47
SN-67	P-2	PF Resin Storage Tank 17,615 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	47
SN-68	P-3	PF Resin Storage Tank 14,680 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	47
SN-69	P-5	PF Resin Storage Tank 14,680 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	47
SN-71	P-6	PF Resin Storage Tank	VOC Formaldehyde	0.2 0.1	0.9 0.4	47

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
		14,680 gal	Phenol	0.1	0.4	
SN-72	P-7	PF Resin Storage Tank 21,138 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	47
SN-73	P-9	PF Resin Storage Tank 21,138 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	47
SN-74	P-10	PF Resin Storage Tank 21,138 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	47
SN-76	RM-1	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.1	0.4 0.4	49
SN-77	RM-2	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.1	0.4 0.4	49
SN-78	RM-3	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.1	0.4 0.4	49
SN-79	RM-4	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.1	0.4 0.4	49
SN-80	RM-5	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.1	0.4 0.4	49
SN-81	RM-6	Resi-Mix Resin Storage Tank	VOC Formaldehyde	0.1 0.1	0.4 0.4	49

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
		31,285 gal				
SN-83	U-2	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	51
SN-84	U-3	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	51
SN-85	U-4	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	51
SN-86	U-5	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	51
SN-87	U-6	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	51
SN-88	U-7	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	51
SN-89	U-8	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	51
SN-90	U-9	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	51
SN-91	U-10	UF Resin Storage Tank	VOC Formaldehyde	0.2 0.1	0.9 0.4	51

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
		25,366 gal	Phenol	0.1	0.4	
SN-92	U-11	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	51
SN-93	U-12	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	51
SN-94	U-13	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.1 0.1	0.9 0.4 0.4	51
SN-95	W-3	DETA, UFC, Pre-Polymer Process Weigh Tank 9,710 gal	VOC Formaldehyde	0.1 0.1	0.4 0.4	54
SN-97	WS-1	Wet Strength Resin Storage Tank 25,366 gal	VOC	0.1	0.4	55
SN-98	WS-2	Wet Strength Resin Storage Tank 25,366 gal	VOC	0.1	0.4	55
SN-99	WS-3	Wet Strength Resin Storage Tank 13,529 gal	VOC	0.1	0.4	55
SN-101	WS-8	Wet Strength Resin Storage Tank 30,932 gal	VOC	0.1	0.4	55
SN-102	WS-7	Wet Strength Resin	VOC	0.1	0.4	55

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
		Storage Tank 30,932 gal				
SN-103	NC-2	Novacote Resin Storage Tank 30,932 gal	VOC	0.1	0.4	56
SN-104	S-1	Liquid Base Resin Storage Tank 24,521 gal	VOC Formaldehyde	0.1 0.1	0.4 0.4	61
SN-105	S-2	Liquid Base Resin Storage Tank 24,521 gal	VOC Formaldehyde	0.1 0.1	0.4 0.4	61
SN-106	T-34	Heads 1 Storage Tank 835,176 gal	VOC	0.1	0.4	70
SN-107	T-27	Tall Oil Blend Tank 30,439 gal	VOC	0.1	0.4	76
SN-108	T-28	Tall Oil Blend Tank 30,439 gal	VOC	0.1	0.4	76
SN-109	T-30	Tall Oil Blend Tank 30,439 gal	VOC	0.1	0.4	76
SN-110	T-32	Tall Oil Blend Tank 16,911 gal	VOC	0.1	0.4	76
SN-111	T-56	Wet Tall Oil Storage Tank - 24,051 gal	VOC	0.1	0.4	82
SN-113	T-57	Wet Tall Oil Storage Tank - 25,379 gal	VOC	0.1	0.4	82

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
SN-116	T-3	Dispersed Size Release Tank - 4,134 gal	VOC	0.1	0.4	86
SN-117	T-60	Dispersed Size Product Storage Tank 32,130 gal	VOC	0.1	0.4	87
SN-118	T-61	Dispersed Size Product Storage Tank 32,130 gal	VOC	0.1	0.4	87
SN-119	T-59	Dispersed Size Product Storage Tank 32,130 gal	VOC	0.1	0.4	87
SN-120	T-11	Novaflo 50 Storage Tank - 25,366 gal	VOC	0.1	0.4	89
SN-121	T-13	Novaflo 50 Storage Tank - 25,366 gal	VOC	0.1	0.4	89
SN-122	T-14	DUF 7% Storage Tank - 25,366 gal	VOC	0.1	0.4	90
SN-123	T-51	Hot Melt Holding Tank 15,220 gal	VOC	1.1	4.6	96
SN-124	NC-3	Novacote Resin Storage Tank 13,000 gal	VOC	0.1	0.4	56
SN-125	Formic	Formic Acid Storage Tank 10,000 gal	VOC	0.1	0.2	57

Georgia-Pacific Resins, Inc.
Permit #: 1177-AOP-R1
CSN #: 02-0028

EMISSION SUMMARY						
Source No. (Date)	Equip. ID	Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
SN-129	OX-3	Thermal Oxidizer	PM PM_{10} SO_2 VOC CO NO_x Iodine	0.3 0.3 21.5 0.5 0.8 0.4 3.7	1.4 1.4 93.9 2.2 3.3 1.7 0.5	33
SN-130	WARE	Package Boiler (80 MMBTU/hr)	PM PM_{10} SO_2 VOC CO NO_x	0.7 0.7 0.5 0.5 12.0 9.6	2.2 2.2 0.2 1.4 39.5 31.6	35

* Batch Average Value

SECTION III: PERMIT HISTORY

Georgia-Pacific Corporation owns and operates several different types of industrial plants in Crossett, Arkansas. The construction of the Chemical Manufacturing Complex was begun in 1969 and has been expanded in several stages since that time. The facility was known as the Chemical Division of the Georgia-Pacific Corporation, Inc. until 1992 when the name was changed to Georgia-Pacific Resins, Inc.

The facility's first air permit (574-A) was issued October 1979 for the construction of a Tall Oil Plant and the emission of a small amounts of particulates, NO_X, and hydrocarbons, as well as 57 pounds per hour of SO_2.

Air Permit 574-AR-1 was issued July 22, 1983, to cover the construction of a Spray-Dry Resin Plant. The increased emissions associated with this project were particulate matter, SO_2, VOCs, phenol, and formaldehyde. This permit addresses the reasons the modification was not subject to PSD review.

Air Permit 574-AR-2 was issued August 28, 1987, to cover the boiler upgrade at the Resin Manufacturing Plant. A 17 MM BTU/hr boiler was replaced by a 94.1 MM Btu/hr boiler. The smaller boiler was put on stand-by status, to be used when the new boiler was shut down for maintenance. The smaller boiler (SN-04) was removed from service August 22, 1995. The larger boiler is now known as the Pitch Boiler (SN-05). This permit addresses the reasons the modification was not subject to PSD review.

Air Permit 1059-A was issued July 5, 1990, to cover the expansion of operations at the Resin Manufacturing Plant. A new process receives rosin acid from the Tall Oil Plant and esterifies it with glycerol or pentaerythritol to form rosin esters. The summary stated that this permit is only for this modification and will be superseded and voided when the next consolidated permit is issued.

Air permit 1177-A was issued September 11, 1991, to install two incinerators to control VOC emissions from the RCI Plant, the ICI Plant, and the Resin Plant. The control equipment associated with the RCI Plant and the ICI Plant were regulated under New Source Performance Standards (NSPS) CFR 40 Part 60, Subpart VV - *Standards of Performance for Equipment of VOC in the Synthetic Chemicals Manufacturing Industry*. This air permit voided permits 574-AR-2 and 1059-A.

Air permit 1177-AR-1 was issued March 19, 1992, to allow the installation of three additional storage tanks and the modification of one existing storage tank previously used to store methanol. Two tanks were designated as tall oil fatty acid tanks, one for crude tall oil, and one

as a surface size tank. All the tanks were regulated by New Source Performance Standards (NSPS) CFR 40 Part 60, Subpart Kb - *Standards of Performance for Volatile Organic Liquid Storage Vessels* specifically, 40 CFR 60.116b(a) and 40 CFR 60.116b(b).

Air permit 1177-AR-2 was issued September 28, 1992, to allow the installation of six additional storage tanks and two baghouses. The tanks were installed in the Tall Oil Plant and the Resin Plant (SN-20 through SN-25). The baghouses were installed on the Resi-Mix Reactor (SN-18) and the Novacote Hopper (SN-19). These tanks were also subject to New Source Performance Standards (NSPS) CFR 40 Part 60, Subpart Kb - *Standards of Performance for Volatile Organic Liquid Storage Vessels*. This permit also noted the name change from Georgia-Pacific Corporation, Inc., Chemical Division to Georgia-Pacific Resins, Inc.

Air permit 1177-AR-3 was issued September 10, 1993, to allow for the installation of four new tanks; a dispersed size storage tank (SN-26), two dispersed size release tanks (SN-27 and SN-28), and a rosin size disperser vessel (SN-29). Only the storage tank was subject to NSPS Subpart Kb.

Air permit 1177-AR-4 was issued January 3, 1994, to allow the replacement of a catalytic incinerator with a thermal incinerator (SN-11). The permit also said that the facility was subject to New Source Performance Standards (NSPS) CFR 40 Part 60, Subpart VV - *Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.*

Air permit 1177-AR-5 was issued April 12, 1996, with 29 new source numbers (SN-30 through SN-58). The permit modification was issued to cover the installation of a new VOC control system which includes a caustic scrubber, followed by a chilled water condenser, and finally the existing pitch boiler (SN-05). This system serves the Tall Oil Fractionation Plant, the Rosin Size Plant, and the Rosin Derivatives Plant. The Tall Oil Fractionation Plant increased production capacity from 73,000 tons to 140,000 tons of crude tall oil per year, installed five new product storage tanks, a rosin drumming tank, a rosin drumming station, and replaced the Dow-Therm heater. The Rosin Size Plant replaced the condenser with a VOC control system. The Rosin Derivatives Plant replaced the two stage condenser with a new VOC control system. The Crude Tall Oil Plant replaced the wet scrubber with a high-efficiency packed column scrubber. The permit stated that the facility was subject to NESHAP 40 CFR Part 63, Subpart G and Subpart H. The permit also stated that the facility was not subject to NSPS 40 CFR 60, Subpart VV or Subpart RRR due to the fact that the formaldehyde plants have not been modified since they were originally constructed.

Air Permit 1177-AOP-R0 was issued August 13, 2001, and it is the initial Title V permit for the facility. This modification will incorporate the following modifications to the facility:

1. The Pitch Boiler SN-05 is now able to burn the Resin Kettle Overheads (RKOs) in addition to its other fuels. Georgia-Pacific Resins requested a modification to produce a rosin product which could cause iodine to be emitted from the Pitch Boiler, SN-05. A three-stage alkaline scrubber was installed to remove the iodine from the vent gas stream prior to being sent to the pitch boiler for destruction;

2. Another modification allowed the production of a pastille rosin which would cause maleic anhydride to be emitted from SN-09, the Derivatives Plant Flaker Bagging Station. Two storage tanks SN-41 and SN-42 were added to store dispro rosin and distilled tall oil respectively. These tanks used the source numbers for two tanks which were removed. A 13,000 gallon Novacote Size Storage Tank, SN-124; and a 10,000 Formic Acid Storage Tank, SN-125 were also added. The modification which included the Formic Acid Storage Tank also included a 10,000 gal sulfuric acid storage tank which is added to the insignificant activities list. An 80 MMBTU/hr Package Boiler, SN-130, was also added in a modification. These changes were all processed as modifications to the facility's previous SIP permit and are all incorporated into this Title V permit; and

3. These changes include the addition of a sixth batch liquid resin manufacturing kettle (K-7) to be controlled by SN-11, the RCI oxidizer, the addition of six Urea-Formaldehyde Resin product storage tanks SN-85, 88, 91, 92, 93, and 94, and the addition of two wet strength resin storage tanks, SN-101 and 102. Other changes from Georgia Pacific's previous permit include adding a pre-polymer storage tank (M-17) and increasing the production of liquid resin to 337 MM pounds per year and increasing the Derivatives Plant production to 7.5 MM pounds per year. There are also 55 sources which were previously considered insignificant which are added to this permit.

SECTION IV: EMISSION UNIT INFORMATION

Facilitywide Sources

SN-05
Pitch Boiler

Source Description

The Pitch Boiler (B-1) produces utility steam for the facility. The Pitch Boiler burns products made at the facility as well as natural gas. The products burned are pitch, resin kettle overheads, fuel blend, and heads. Pitch, heads, and associated blend fuels are all products of the tall oil fractionation plant (TOFRAC). The resin kettle overheads are a product of the rosin derivatives plant. The Pitch Boiler serves as a VOC control system. The Pitch Boiler VOC control system controls emissions from the size and derivative kettles as well as TOFRAC.

GPRI manufactures a rosin, Lytor 105k, which uses an iodide catalyst in the rosin cooker (C-1). During certain phases of the rosin cook, iodine could escape from the cooker in the form of elemental iodine and light organic iodine containing compounds. A three-stage alkaline scrubber was installed in January 2001 to scrub iodine from the vent gas stream prior to being sent to the pitch boiler for destruction.

Specific Conditions

4. 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 this condition will be demonstrated by Specific Condition 7.

Pollutant	lb/hr	tpy
PM_{10} (normal) (sootblowing)	35.0 85.0	180.6
SO_2	10.5	46.0
VOC	4.6	20.1
CO	3.2	14.0
NO_X	13.2	57.8

5. 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 this condition will be demonstrated by Specific Conditions 6 and 7.

Pollutant	lb/hr	tpy
PM (normal) (sootblowing)	35.0 85.0	180.6
Iodine	3.7	0.5

6. Pursuant to §19.503 and 40 CFR Part 52, Subpart E, visible emissions from this source shall not exceed 20 percent opacity as measured by EPA Reference Method 9. Compliance with this limit shall be demonstrated by Specific Condition 4.

7. Pursuant to §19.703, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct weekly observations of the opacity from this source. This weekly opacity reading shall be taken in accordance with EPA Reference Method 9. The weekly observation shall be performed by a certified opacity reader. Compliance with this condition shall be demonstrated by Specific Condition 5.

8. Pursuant to §19.705, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of all weekly opacity observations performed required in Specific Condition 4. These records shall be kept on site and made available to Department personnel upon request. These records shall include the following information.

    a. The date and time of the observation,
    b. The opacity of the source, and
    c. The person conducting the opacity observation.

9. Pursuant to §18.1004 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 maintain a scrubbing liquid with a pH of at least 9.0 and a minimum flow rate of 10 gallons per minute in the third stage of the iodine scrubber. The permittee shall maintain record of the scrubbing liquid flow rate and pH in the third stage of the iodine scrubber prior to each batch of Lytor 105k. These records shall be kept on site and made available to Department personnel upon request.

10. Pursuant to §19.702 and 40 CFR Part 52, Subpart E, the permittee shall test the Pitch Boiler, SN-05, for emissions of PM, CO, NO_X, SO_2, and VOC to test compliance with the limits set forth in the table in Specific Conditions 1 and 2 above. These tests shall be conducted with in 180 days of the issuance date of this permit. These tests shall be conducted using an EPA approved test method for each pollutant tested.

11. Pursuant to §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the Thermal Oxidizer, SN-129, or the Pitch Boiler, SN-05, shall be operated at all times that the Tall Oil Fractionation Plant, the Rosin Size Plant, or the Rosin Derivatives Plant is in production.

SN-11

RCI UFC/Formaldehyde Manufacturing Process Oxidizer

Source Description

The RCI Formaldehyde Manufacturing Process Oxidizer, OX-1, controls emissions from the liquid resin manufacturing plant and the RCI Urea Formaldehyde Concentrate (UFC)/Formaldehyde manufacturing process. When the RCI UFC/Formaldehyde Manufacturing Process is in operation, the RCI Oxidizer, OX-1, controls emissions from M-2 the methanol storage tank; F-1 through F-5, the formaldehyde storage tanks; C1-C6, the UFC storage tanks; K1-K7, the resin kettles; ABS-1, RCI UFC/Formaldehyde Process; and the transfer racks. If the RCI UFC/Formaldehyde Process is not in operation, emissions from M-2 the methanol storage tank; F-1 through F-5, the formaldehyde storage tanks; C1-C6, the UFC storage tanks; K1-K7, the resin kettles; and the transfer racks are controlled by the RCI oxidizer.

The RCI Oxidizer is subject to HON rule because it serves as the control device for the methanol storage tank. The transfer racks are subject to the HON rule, but are considered Group 2 under the HON. Therefore, the transfer racks are not required to be continuously controlled. The RCI UFC/Formaldehyde Manufacturing Process is not subject to the HON rule because it is a flexible operating unit as defined by the subpart. The RCI UFC/Formaldehyde Manufacturing Process is capable of producing both formaldehyde and urea formaldehyde concentrate. Since production of formaldehyde, the HON regulated product, alone is not more than 50% of the production of the RCI UFC/Formaldehyde Manufacturing Process the process is not subject to the HON rule.

The kettle K-7 will be subject to 40 CFR Part 63, Subpart W upon startup.

Specific Conditions

12. 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 this condition will be demonstrated by Specific Condition 16 and Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.4
SO_2	0.1	0.4

Pollutant	lb/hr	tpy
VOC	2.0	8.8
CO	4.7	20.6
NO_X	0.5	2.2

13. 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 this condition will be demonstrated by Specific Condition 16 and Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM	0.1	0.4
Formaldehyde	0.3	1.0
Phenol	0.1	0.4
Methanol	0.9	3.9
Epichlorohydrin	0.1	0.4

14. Pursuant to §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5 percent opacity as measured by EPA reference Method 9. Compliance with this limit shall be demonstrated by natural gas combustion.

15. Pursuant to §19.304 and 40 CFR Part 63 Subpart G, §63.119(e)1-5, the permittee shall reduce inlet emissions of total organic HAP by 95 percent from RCI UFC/Formaldehyde Manufacturing Process or greater except during periods of planned routine maintenance and during a control system malfunction. Compliance with this condition will be demonstrated by Specific Conditions 16.

16. Pursuant to §19.304 and 40 CFR Part 63 Subpart OOO, §63.1406(a)(2)ii, the permittee shall reduce inlet emissions of total organic HAP by 83 percent or greater from kettles K-1 through K-5 and K-7 except during periods of planned routine maintenance and during

a control system malfunction. Compliance with this condition will be demonstrated by Specific Conditions 16 and 19.

17. Pursuant to §19.304 and 40 CFR Part 63 Subpart G, §63.119(e)3, periods of planned routine maintenance for the RCI UFC/Formaldehyde Manufacturing Process Oxidizer, OX-1, SN-11, shall not exceed 240 hours per year. Compliance with this condition will be shown by Specific Conditions 15 and 21.

18. Pursuant to §19.705 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 maintain a record of all planned routine maintenance for the RCI UFC/Formaldehyde Manufacturing Process Oxidizer, OX-1, SN-11.

19. Pursuant to §19.304, 40 CFR Part 63 Subpart G, §60.120(d)5, and 40 CFR Part 63 Subpart OOO, §63.1425(d)(1), the permittee shall maintain a fire box temperature of 1250 EF or higher in the RCI Formaldehyde Manufacturing Process Oxidizer, OX-1, SN-11 whenever the RCI formaldehyde plant is in operation, the methanol tank is in service, or the kettles K-1 through K-7 are producing amino-phenolic resins. Compliance with this condition will be demonstrated by Specific Conditions 17 and 18.

20. Pursuant to §19.304, 40 CFR Part 63 Subpart G, and 40 CFR Part 63 Subpart OOO, the permittee shall install, calibrate, maintain, and operate according to manufacturers specifications a temperature monitoring device equipped with a continuous recorder. The temperature monitoring device shall be installed in the firebox of the incinerator or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.

21. Pursuant to §19.304,40 CFR Part 63 Subpart G, and 40 CFR Part 63 Subpart OOO, the permittee shall maintain continuous records of the temperature in the firebox as monitored by the temperature monitoring device. The permittee shall also maintain daily averages of the firebox temperature.

22. Pursuant to §19.304, 40 CFR Part 63 Subpart OOO, §63.1413, and 40 CFR Part 63 Subpart SS, §63.988 the permittee shall conduct a initial compliance test of the HAP destruction efficiency of the RCI Formaldehyde Manufacturing Process Oxidizer, SN-11. This test shall be conducted in accordance with the provisions of §63.1413 and §63.997 . This test shall be conducted within 150 days of the compliance date of Subpart OOO.

    If the permittee wishes to use prior compliance test to show compliance with the percent reduction requirements of Subpart OOO as allowed by §63.997(b)(1), the permittee must

submit a written application to use the previous test to show compliance as specified in §63.999(a)(1)(iv). This written application must be submitted no later than 90 days before the performance test or compliance test is required and shall include all information required in §63.999(a)(1)(iv).

23. Pursuant to §19.304 and 40 CFR Part 63 Subpart G, the permittee shall conduct annual inspections of the RCI Formaldehyde Manufacturing Process Oxidizer, SN-11 and all its associated equipment subject to 40 CFR Part 63 Subpart G. These annual inspections shall be conducted according to §63.120(d).

24. Pursuant to §19.304 and 40 CFR Part 63 Subpart G, the permittee shall submit Periodic Reports as outlined in §63.152(c).

25. Pursuant to §19.304 and 40 CFR Part 63 Subpart G, §63.130(f), the permittee shall record, update annually, and maintain the following information: An analysis of the design and actual throughput of the transfer rack, an analysis documenting the weight-percent organic HAP's in the liquid loaded, and an analysis documenting the annual rack weighted average HAP partial pressure of the transfer rack. These records shall be kept on site and made available to Department personnel upon request.

26. Pursuant to §19.304 and 40 CFR Part 63 Subpart OOO, §63.1415(d)(1), the permittee shall install, maintain, and operate a flow indicator on the bypass line which diverts emissions required to be controlled by this subpart so they are not routed to OX-1.

27. Pursuant to §19.304 and 40 CFR Part 63 Subpart OOO, §63.1416, **the permittee shall develop, implement and maintain a startup, shutdown, and malfunction plan prior to January 20, 2003.**

28. Pursuant to §19.304 and 40 CFR Part 63 Subpart OOO, §63.1410, the permittee shall comply with the equipment leak provisions of 40 CFR Part 63, Subpart UU. **The provisions of Subpart UU include:**

a. Identifying all equipment subject to Subpart UU - §63.1**022**
b. Conducting monitoring for leaks - §63.1**022**
c. Maintain records for equipment subject to Subpart UU - §63.1**038**
d. Reporting is required in the Periodic Reports of Subpart OOO in Specific Condition 28.

29. Pursuant to §19.304 and 40 CFR Part 63 Subpart OOO, §63.1417(d), **the permittee shall submit a Precompliance Report as outlined in** §63.1417(d) **at least 12 months prior**

to the compliance date of January 20, 2003. Also by this date the permittee shall submit any permit modifications necessary to bring the facility into compliance with this Subpart.

30. Pursuant to §19.304 and 40 CFR Part 63 Subpart OOO, §63.1417(e), **the permittee shall submit a Notification of Compliance Status as outlined in** §63.1417(e) **within 150 days after the January 20, 2003 compliance date.**

31. Pursuant to §19.304 and 40 CFR Part 63 Subpart OOO, §63.1417(f), **the permittee shall submit Periodic Reports as outlined in** §63.1417(f) **no later than 60 days after each 180 day period. The first report shall be due no later than 240 days after the Notification of Compliance Status is due. Each report shall cover the previous 6-month period.**

32. Pursuant to §19.304 and 40 CFR Part 63 Subpart OOO, §63.1417(g), **the permittee shall submit start-up, shutdown, and malfunction reports on the same schedule as the Periodic Reports in Specific Condition 28.**

33. Pursuant to §19.304 and 40 CFR Part 63 Subpart OOO, §63.1417(h), **the permittee shall submit other reports as required by** §63.1417(h)**. These reports shall include:**

- **a.** Notification of storage vessel inspection as specified in 40 CFR Part 63, Subpart WW. - §63.1417(h)**(1)**
- **b.** Site Specific Test Plan. This report shall be submitted no later than 90 days prior the planned date for a performance test and shall contain the information required in §63.1417(h)**(2).**
- **c.** Notification of Planned Performance Tests. This notification shall be at least 30 days prior to the date the performance test is scheduled. - §63.1417(h)**(3).**
- **d.** Notification of change in primary product. - §63.1417(h)**(4)**
- **e.** Notification of added emission points. - §63.1417(h)**(5)**
- **f.** Redesignation of control device. - §63.1417(h)**(6)**
- **g.** Notification of process change. - §63.1417(h)**(7)**

SN-129
Thermal Oxidizer

Source Description

The thermal oxidizer is a direct flame thermal oxidizer. Although, the device is intended as a back up for the Pitch Boiler, SN-05, it is permitted for continuous use. The thermal oxidizer uses natural gas as an auxiliary fuel.

Specific Conditions

34. 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 this condition will be demonstrated by Specific Conditions 35 and 37.

Pollutant	lb/hr	tpy
PM_{10}	0.3	1.4
SO_2	21.5	93.9
VOC	0.5	2.2
CO	0.8	3.3
NO_X	0.4	1.7

35. 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.

Pollutant	lb/hr	tpy
PM	0.3	1.4
Iodine	3.7	0.5

36. Pursuant to §19.503 and 40 CFR Part 52, Subpart E, visible emissions from this source shall not exceed 20 percent opacity as measured by EPA Reference Method 9. Compliance with this limit shall be demonstrated by Specific Condition 34.

37. Pursuant to §19.703, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct weekly observations of the opacity from this source. These weekly observations shall be conducted by a person trained in EPA Reference Method 9. If visible emissions in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the excess visible emissions, implement corrective action, and document that the visible emissions did not exceed the permitted opacity following the corrective action.

38. Pursuant to §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall maintain a temperature of 1500 EF or higher in the Thermal Oxidizer whenever the Thermal Oxidizer, SN-129, is in service. Compliance with this condition will be demonstrated by Specific Condition 36.

39. Pursuant to §19.705 and 40 CFR Part 52, Subpart E, the permittee shall maintain daily records of the temperature in the Thermal Oxidizer, SN-129, for each day the unit is in use. These records shall be kept on site and made available to Department personnel upon request.

40. Pursuant to §19.702 and 40 CFR Part 52, Subpart E, the permittee shall test the Thermal Oxidizer, SN-129, for emissions of SO_2 and VOC to test compliance with the limits set forth in the table in Specific Condition 2 above. These tests shall be conducted with in 180 days of the issuance date of this permit. These tests shall be conducted using an EPA approved test method for each pollutant tested and while operating as a control device for the facility.

41. Pursuant to §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the Thermal Oxidizer, SN-129, or the Pitch Boiler, SN-05, shall be operated at all times that the Tall Oil Fractionation Plant, the Rosin Size Plant, or the Rosin Derivatives Plant is in production.

SN-130
Package Boiler

Source Description

The Package Boiler is a 80 MMBTU/hr Nebraska Boiler Company natural gas fired boiler. The boiler uses 10% flue gas recirculation to minimize nitrogen oxide emissions. The boiler is subject to NSPS Subpart Dc.

Specific Conditions

42. 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 this condition will be demonstrated by Specific Condition 42.

Pollutant	lb/hr	tpy
PM_{10}	0.7	2.2
SO_2	0.5	0.2
VOC	0.5	1.4
CO	12.0	39.5
NO_X	9.6	31.6

43. 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 this condition will be demonstrated by Specific Condition 42.

Pollutant	lb/hr	tpy
PM	0.7	2.8

44. Pursuant to §19.503 and 40 CFR Part 52, Subpart E, visible emissions from this source shall not exceed 5 percent opacity as measured by EPA Reference Method 9. Compliance with this limit shall be demonstrated by natural gas combustion.

45. Pursuant to §19.705, 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 combust more than 536.67 MMscf of natural gas in any consecutive 12 month period in the Package Boiler, SN-130. Compliance with this limit shall be demonstrated by Specific Condition 43.

46. Pursuant to §19.304 and 40 CFR Part 60 Subpart Dc, the permittee shall maintain records of all natural gas combusted in the package boiler, SN-130, each month and the 12 month total of gas combusted. These records should be updated by the 10th day of the month following the month the records represent and shall be submitted in accordance with General Condition 7.

Liquid Resin Manufacturing Sources

SN-13
Resi-Mix Silo Process Feed System Baghouse

Source Description

The Resi-Mix Silo Process Feed System Baghouse, BH-2, controls dust emissions from the CO-COB Silo and the Flour Silo, D1 and D2, as well as the raw material conveying equipment. The dust collected in the baghouse is recycled and used as raw material in the Resi-Mix Process.

Specific Conditions

47. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.4

48. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM	0.1	0.4

49. Pursuant to §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5 percent opacity as measured by EPA reference Method 9. Compliance with this limit shall be demonstrated by Plantwide Condition 16.

SN-18
Resi-Mix Resin Process Mix Tank

Source Description

Dust emissions from the Resi-Mix Resin Process Mix Tank, K-6, are controlled by a baghouse, BH-3. Raw materials, dry extenders from silos D-1 and D-2, sodium hydroxide from tank M-19, process water from tank M-3, and other ingredients including recycled resin, dried animal blood, and soda ash. Once mixed, the product is transferred to the Resi-Mix Storage Tanks, RM-1 to RM-7, Sources SN-76 through 81 and SN-31.

Specific Conditions

50. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.4

51. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM	0.1	0.4

52. Pursuant to §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5 percent opacity as measured by EPA reference method 9. Compliance with this limit shall be demonstrated by Plantwide Condition 16.

SN-19
SMA Feed Hoppers and Grinders

Source Description

The Styrene-Malic Anhydride (SMA) feed system's dust emissions are controlled by a baghouse, BH-1. The SMA feed system includes feed hoppers, conveying equipment, and a grinder. Collected dust is recycled into the feed hopper.

Specific Conditions

53. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.4

54. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM	0.1	0.4

55. Pursuant to §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5 percent opacity as measured by EPA reference method 9. Compliance with this limit shall be demonstrated by Plantwide Condition 16.

SN-59
Phenol Process Water Storage Tank

Source Description

The Phenol Process Water Storage Tank, M-3, provides raw materials to RMK-1, the Resi-Mix Mix Tank and to the liquid resins kettles. The phenol process water comes from Kettle rinse out and contaminated storm water.

Specific Conditions

56. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

57. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
Phenol	0.1	0.4

SN-60
Cresylic Acid Storage Tank

Source Description

The Cresylic Acid Storage Tank, M-5, provides cresylic acid as a raw material to the liquid resin kettles.

Specific Conditions

58. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

59. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
O-Cresol	0.1	0.4

SN-61
Red Water Tank

Source Description

The Red Water tank is used to store resin process water. Resin wastewater stored in this tank is transferred to the Kettles as a raw material for liquid resin manufacturing.

Specific Conditions

60. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

61. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
Phenol	0.1	0.4

SN-62
Phenol Storage Tank

Source Description

The Phenol Storage Tank, M-8, provides phenol to the kettles at the liquid resin manufacturing plant.

Specific Conditions

62. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.6	2.6

63. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
Phenol	0.6	2.6

SN-63 and 65
Pre-Polymer Storage Tanks

Source Description

The Pre-Polymer Storage Tanks, P8 and P-12, provide raw materials to kettles. Pre-polymer is transported to K-2 through meters. The material is transported to a weigh tank (W-3) which sends the proper amount of pre-polymer to K-1 and K-4. Pre-polymer is an intermediate product which is manufactured in the kettles for later use in manufacturing the final resin product.

Specific Conditions

64. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

SN-64
DETA Storage Tank

Source Description

The diethylene triamine (DETA) Storage Tank provides raw material, DETA, for kettles. The DETA can be processed through either a mass flow meter or a process weigh tank (W-3) which send the proper amount of DETA to the kettles.

Specific Conditions

65. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

SN-30, 66, 67, 68, 69, 71, 72, 73, and 74
PF Resin Storage Tanks

Source Description

The PF Resin Storage tanks are product storage tanks which hold phenol formaldehyde resins produced in the kettles until they are shipped off site by trucks. The PF Resin Storage Tanks have equipment ID numbers P-1, P-2, P-3, P-5, P-6, P-7, P-9, P-10, and P-11. These tanks are authorized to store either PF-Resin or UF-Resin.

Specific Conditions

66. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
30	VOC	0.2	0.9
66	VOC	0.2	0.9
67	VOC	0.2	0.9
68	VOC	0.2	0.9
69	VOC	0.2	0.9
71	VOC	0.2	0.9
72	VOC	0.2	0.9
73	VOC	0.2	0.9
74	VOC	0.2	0.9

67. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
30	Formaldehyde Phenol	0.1 0.1	0.4 0.4
66	Formaldehyde Phenol	0.1 0.1	0.4 0.4
67	Formaldehyde Phenol	0.1 0.1	0.4 0.4
68	Formaldehyde Phenol	0.1 0.1	0.4 0.4
69	Formaldehyde Phenol	0.1 0.1	0.4 0.4
71	Formaldehyde Phenol	0.1 0.1	0.4 0.4
72	Formaldehyde Phenol	0.1 0.1	0.4 0.4
73	Formaldehyde Phenol	0.1 0.1	0.4 0.4
74	Formaldehyde Phenol	0.1 0.1	0.4 0.4

SN-31, 76, 77, 78, 79, 80, and 81
Resi-mix Storage Tanks

Source Description

The Resi-mix Storage Tanks are product storage tanks for Resi-mix resins produced in the resi-mix tank (K-^) of the resi-mix liquid resin manufacturing plant. The tanks hold the resi-mix resin product until it is loaded onto trucks for off site shipment.

Specific Conditions

68. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
31	VOC	0.1	0.4
76	VOC	0.1	0.4
77	VOC	0.1	0.4
78	VOC	0.1	0.4
79	VOC	0.1	0.4
80	VOC	0.1	0.4
81	VOC	0.1	0.4

69. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy

Source Number	Pollutant	lb/hr	tpy
31	Formaldehyde	0.1	0.4
76	Formaldehyde	0.1	0.4
77	Formaldehyde	0.1	0.4
78	Formaldehyde	0.1	0.4
79	Formaldehyde	0.1	0.4
80	Formaldehyde	0.1	0.4
81	Formaldehyde	0.1	0.4

SN-83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, and 94
UF Resin Storage Tank

Source Description

The UF Resin Storage Tanks, U-2 through U-13, store the urea-formaldehyde resin products produced by kettles K-1 through K-3 of the liquid resin manufacturing plant. The tanks hold the UF Resin product until it is loaded onto trucks for off site shipment. Tanks 91-94 are authorized for construction under this permit. The UF-Resin storage tanks are permitted to store both UF-Resin and PF-Resin.

Specific Conditions

70. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
83	VOC	0.2	0.9
84	VOC	0.2	0.9
85	VOC	0.2	0.9
86	VOC	0.2	0.9
87	VOC	0.2	0.9
88	VOC	0.2	0.9
89	VOC	0.2	0.9
90	VOC	0.2	0.9
91	VOC	0.2	0.9
92	VOC	0.2	0.9
93	VOC	0.2	0.9

Source Number	Pollutant	lb/hr	tpy
94	VOC	0.2	0.9

71. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
83	Formaldehyde Phenol	0.1 0.1	0.4 0.4
84	Formaldehyde Phenol	0.1 0.1	0.4 0.4
85	Formaldehyde Phenol	0.1 0.1	0.4 0.4
86	Formaldehyde Phenol	0.1 0.1	0.4 0.4
87	Formaldehyde Phenol	0.1 0.1	0.4 0.4
88	Formaldehyde Phenol	0.1 0.1	0.4 0.4
89	Formaldehyde Phenol	0.1 0.1	0.4 0.4
90	Formaldehyde Phenol	0.1 0.1	0.4 0.4
91	Formaldehyde Phenol	0.1 0.1	0.4 0.4
92	Formaldehyde Phenol	0.1 0.1	0.4 0.4

Source Number	Pollutant	lb/hr	tpy
93	Formaldehyde Phenol	0.1 0.1	0.4 0.4
94	Formaldehyde Phenol	0.1 0.1	0.4 0.4

SN-95
DETA, Phenol, UFC, HCHO, and Pre-Polymer Process Weigh Tank

Source Description

The DETA, Phenol, UFC, HCHO, and Pre-Polymer Process Weigh Tank, W-3, meters the amount of DETA, urea-formaldehyde concentrate, and pre-polymer from tanks M-15 (DETA), P-8 and P-12 (pre-polymer), C-1 through C6 (urea-formaldehyde concentrate), and F1-F5 (formaldehyde) being fed into kettles.

Specific Conditions

72. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

73. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
Formaldehyde	0.1	0.4

SN-21, 22, 23, 97, 98, 99, 101, and 102
Wet Strength Resin and Dry Resin Storage Tanks

Source Description

The Wet Strength Resin Storage Tanks, WS-1 through WS-7 and DS-1, provide product storage for wet strength resin produced in the liquid resin manufacturing kettles until the wet strength resin can be loaded onto trucks for off site shipment.

Specific Conditions

74. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
21	VOC	0.1	0.4
22	VOC	0.1	0.4
23	VOC	0.1	0.4
97	VOC	0.1	0.4
98	VOC	0.1	0.4
99	VOC	0.1	0.4
101	VOC	0.1	0.4
102	VOC	0.1	0.4

SN-17, 103, and 124
Novacote Resin Storage Tanks

Source Description

The Novacote Resin Storage Tanks, NC-1, NC-2, and NC-3 provide product storage for Novacote resin produced in the liquid resin manufacturing kettles until the Novacote resin can be loaded onto trucks for off site shipment.

Specific Conditions

75. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
17	VOC	0.1	0.4
103	VOC	0.1	0.4
124	VOC	0.1	0.4

SN-125
Formic Acid Storage Tank

Source Description

The formic acid storage tank stores raw material used in the kettles.

Specific Conditions

76. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

Spray Dry Resin Manufacturing Sources

SN-03
Spray Dry Resin Process and Process Heater

Source Description

The particulate emissions from the Spray Dry Resin Process and the Spray Dry Process Heater (SDH-1) are controlled by a baghouse, BH-4. Certain types of liquid resins are used to manufacture spray-dried resins. These liquid resins are pumped through a heat exchanger and then injected into the spray dryer (SD-1). The spray dryer is heated by a 10 MM Btu/hr natural gas fired drier. After the drying chamber, the particulate emissions are directed to the baghouse BH-4. The dried resin is cooled by the introduction of ambient air. This solidifies the resin before it enters a series of high efficiency cyclones. The primary cyclones collect the resin product from the air stream while dust-laden air is discharged to the baghouse BH-4. The collected resin is mixed with a refrigerated air stream and sent to a pair of secondary cyclones. These two cyclones collect the final resin product for discharge through the packaging system. The air discharge from the secondary cyclones is sent to the baghouse, BH-4. The dust collected by the baghouse, BH-4 is recycled to the secondary cyclones for reprocessing.

Specific Conditions

77. 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 this condition will be demonstrated by Specific Condition 77 and Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM_{10}	22.2	97.2
SO_2	0.1	0.4
VOC	14.9	65.1
CO	0.4	1.8
NO_X	1.4	6.1

78. 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 this condition will be demonstrated by Specific Condition 77 and Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM	22.2	97.2
Formaldehyde	7.2	7.2
Phenol	2.3	2.3
Methanol	5.3	5.3

79. Pursuant to §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5 percent opacity as measured by EPA reference Method 9. Compliance with this limit shall be demonstrated by Plantwide Condition 16.

80. Pursuant to §19.702 and 40 CFR Part 52, Subpart E, the permittee shall test the Spray Dry Resin Process and Process Heater, SN-03, for emissions of PM and VOC to test compliance with the limits set forth in the table in Specific Condition 74 above. These tests shall be conducted with in 180 days of the issuance date of this permit. These tests shall be conducted using an EPA approved test method for each pollutant tested.

SN-104 and 105
Base Liquid Resin Storage Tanks

Source Description

The Base Liquid Resin Storage Tanks, S-1 and S-2, store the PF resins produced at the liquid resin manufacturing plant which will be used in the production of spray dry resins.

Specific Conditions

81. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
104	VOC	0.1	0.4
105	VOC	0.1	0.4

82. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
104	Formaldehyde	0.1	0.4
105	Formaldehyde	0.1	0.4

Formaldehyde Production Plant Sources

SN-10
ICI Urea-Formaldehyde Process Oxidizer

Source Description

The ICI Formaldehyde Process Oxidizer, OX-2, controls VOC emissions from the ICI urea-formaldehyde process. The Oxidizer uses natural gas as an auxiliary fuel.

Specific Conditions

83. 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 this condition will be demonstrated by Specific Condition 84 and Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM_{10}	0.2	0.9
SO_2	0.1	0.4
VOC	1.7	7.7
CO	0.2	0.9
NO_X	0.9	3.9

84. 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 this condition will be demonstrated by Specific Condition 84 and Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM	0.2	0.9
Formaldehyde	0.4	1.8
Methanol	1.3	5.9

85. Pursuant to §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5 percent opacity as measured by EPA reference Method 9. Compliance with this limit shall be demonstrated by natural gas combustion.

86. Pursuant to §19.304 and 40 CFR Part 63 Subpart G, §63.113(a)2, the permittee shall reduce inlet emissions of total organic HAP by 98 percent or greater except during periods of planned routine maintenance and during a control system malfunction.

87. Pursuant to §19.304 and 40 CFR Part 63 Subpart G, §63.114(e), the permittee shall maintain a fire box temperature of 1600 EF or higher in the ICI Urea-Formaldehyde Manufacturing Process Oxidizer, OX-2, SN-10 whenever ICI urea-formaldehyde plant is in operation. Compliance with this condition will be demonstrated by Specific Conditions 85 and 86.

88. Pursuant to §19.304 and 40 CFR Part 63 Subpart G, §63.118(a)1, the permittee shall install, calibrate, maintain, and operate according to manufacturers specifications a temperature monitoring device equipped with a continuous recorder. The temperature monitoring device shall be installed in the firebox of the incinerator or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs. Compliance with this condition will be demonstrated by Specific Condition 86.

89. Pursuant to §19.304 and 40 CFR Part 63 Subpart G, §63.152(a), the permittee shall maintain continuous records of the temperature in the firebox as monitored by the temperature monitoring device. The permittee shall also maintain daily averages of the firebox temperature.

90. Pursuant to §19.304 and 40 CFR Part 63 Subpart G, the permittee shall submit Periodic Reports as outlined in §63.152.

Tall Oil Fractionation Plant Sources

SN-01
Hot Oil Heater for TOFRAC Plant

Source Description

The Hot Oil Heater for the TOFRAC Plant, HOH-1 provides utility heat in the reboilers of the Tall oil fractionation plant. The hot oil heater is fueled by natural gas and has a heat input capacity of 41.5 MM Btu/hr.

Specific Conditions

91. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM_{10}	0.6	2.6
SO_2	0.1	0.4
VOC	0.3	1.3
CO	1.5	6.6
NO_X	6.1	26.7

92. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM	0.6	2.6

93. Pursuant to §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5 percent opacity as measured by EPA reference Method 9. Compliance with this limit shall be demonstrated by natural gas combustion.

SN-16, SN-20, and SN-40
Crude Tall Oil Storage Tanks

Source Description

The Crude Tall Oil Storage Tanks, tank numbers T-40, T-41, and T-42, store crude tall oil for use as a raw material for the tall oil fractionation plant. Each tank has a storage capacity of 835,000 gal. Crude tall oil is received at the facility from railcars and tank trucks and is unloaded into Debrine Storage tanks. The Debrine Storage Tanks separate the brine layer from the crude tall oil. The debrined tall oil is then sent from the debrine storage tanks to the crude tall oil storage tanks.

Specific Conditions

94. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
16	VOC	0.1	0.4
20	VOC	0.1	0.4
40	VOC	0.1	0.4

SN-32, 43, and 44
Pitch Storage Tanks

Source Description

The Pitch Storage Tanks, tank numbers T-47, 24, and 36, store the pitch product of the depitching unit of the Tall Oil Fractionation Plant. The Pitch from the tanks is sent off site by rail car and tank truck and is used as a fuel for the pitch boiler, SN-05.

Specific Conditions

95. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
32	VOC	0.1	0.4
43	VOC	0.1	0.4
44	VOC	0.1	0.4

SN-106
Heads 1 Storage Tank

Source Description

The Heads 1 storage tank, tank number T-34, stores oil collected from the condensate collection tanks, V-601 and 602. Heads are transferred back to Georgia-Pacific Corporation's Crossett Paper Operations for processing.

Specific Conditions

96. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

SN-33, 34, 45, and 47
Heads 2 Storage Tanks

Source Description

The Heads 2 Storage Tanks, tank numbers T-20, 31, 19 and 29, store the overhead product of the primary rosin column. Heads is shipped off site as product by tank truck and rail car or is sent on for further processing in the tall oil fractionation plant.

Specific Conditions

97. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
33	VOC	0.1	0.4
34	VOC	0.1	0.4
45	VOC	0.1	0.4
47	VOC	0.1	0.4

SN-14, 15, 46, 48, 49, and 58
Tall Oil Fatty Acid Storage Tanks

Source Description

The Tall Oil Fatty Acid Storage Tanks, tank numbers T-43, 44, 22, 18, 17, and 46, store product from the fatty acid distillation column. The tall oil fatty acid is shipped off site by rail car.

Specific Conditions

98. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
14	VOC	0.1	0.4
15	VOC	0.1	0.4
46	VOC	0.1	0.4
48	VOC	0.1	0.4
49	VOC	0.1	0.4
58	VOC	0.1	0.4

SN-24, 35, 52, 53, 54, 55, and 56
Tall Oil Rosin Storage Tanks

Source Description

The Tall Oil Rosin Storage Tanks, tank numbers T-21, 49, 7, 8, 9, 10, and 12, store the rosin product from the primary and secondary rosin columns. The rosin storage tanks store the rosin until it can be shipped off site by tank truck and rail car or sent to the rosin drumming tank, size cooker, or derivatives reactor.

Specific Conditions

99. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
24	VOC	0.1	0.4
35	VOC	0.1	0.4
52	VOC	0.1	0.4
53	VOC	0.1	0.4
54	VOC	0.1	0.4
55	VOC	0.1	0.4
56	VOC	0.1	0.4

SN-36 and 50
502 Bottoms Storage Tanks

Source Description

The 502 Bottoms Storage Tanks, tank numbers 26 and 25, store the bottoms product from the fatty acid distillation column of the tall oil fractionation plant. The 502 bottoms product is shipped off site by rail car, tank truck, and used in formulated products.

Specific Conditions

100. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
36	VOC	0.1	0.4
50	VOC	0.1	0.4

SN-42 and 51
Distilled Tall Oil Storage Tanks

Source Description

The Distilled Tall Oil Storage Tanks, tank numbers 6 and 23 store the distilled tall oil product from the fatty acid distillation column. The distilled tall oil is shipped off site by rail car, tank truck, and used in formulated products.

Specific Conditions

101. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
42	VOC	0.3	0.9
51	VOC	0.1	0.4

SN-107, 108, 109, and 110
Tall Oil Blend Tanks

Source Description

The Tall Oil Blend Tanks are tank numbers T-27, 28, 30, and 32.

Specific Conditions

102. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
107	VOC	0.1	0.4
108	VOC	0.1	0.4
109	VOC	0.1	0.4
110	VOC	0.1	0.4

SN-37
Rosin Drumming Storage Tank

Source Description

The Rosin Drumming Storage Tank, tank number T-50, stores rosin product from the tall oil rosin storage tanks which is being sent to the rosin drumming for packaging.

Specific Conditions

103. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

Tall Oil Acidulation Plant

SN-12
Crude Tall Oil Acidulation Plant

Source Description

The Crude Tall Oil Acidulation Plant takes tall oil soap skimmings from off-site pulp and paper mills, water and sulfuric acid and combines them in the CTO cooker. The CTO cooker is a 75,000 gallon insulated tank with an agitator. The vapors from the cooking process, including sulfur dioxide, sulfuric acid, total reduced sulfur compounds, and volatile organic compounds are emitted from the cooker and routed to the CTO scrubber, SN-12. VOC hourly emissions are based on a batch average.

Specific Conditions

104. 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 this condition will be demonstrated by Plantwide Condition 14 and Specific Condition 106.

Pollutant	lb/hr	tpy
PM_{10}	0.7	3.1
SO_2	1.9	8.3
VOC	3.0*	6.6

* Batch Average Value

105. 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 this condition will be demonstrated by Plantwide Condition 14 and Specific Condition 106.

Pollutant	lb/hr	tpy
PM	0.7	3.1
H_2S	0.3	1.3
H_2SO_4	0.1	0.4

Pollutant	lb/hr	tpy
Methanol	0.2	0.9

106. Pursuant to §19.503 and 40 CFR Part 52, Subpart E, visible emissions from this source shall not exceed 20 percent opacity as measured by EPA reference Method 9. Compliance with this limit shall be demonstrated by Specific Condition 104.

107. Pursuant to §19.703, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct weekly observations of the opacity from this source, SN-12. This weekly opacity reading shall be taken in accordance with EPA Reference Method 9. The weekly observation shall be performed by a certified opacity reader. Compliance with this limit shall be demonstrated by Specific Condition 105.

108. Pursuant to §19.705, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of all weekly opacity observations performed required in Specific Condition 104. These records shall be kept on site and made available to Department personnel upon request. These records shall include the following information.

    a. The date and time of the observation,
    b. The opacity of the source, and
    c. The person conducting the opacity observation.

109. Pursuant to §19.705, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain a minimum liquid flow rate in the scrubber, SN-12, of 80 - 120 gallons per minute. The permittee shall also maintain a pH in the scrubbing liquid of 9.0 or greater.

110. Pursuant to §19.705 and 40 CFR Part 52, Subpart E, the permittee shall each week record the scrubbing liquid flow rate and pH value in SN-12. These records shall be kept on site and made available to Department personnel upon request.

111. Pursuant to §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31, and 40 CFR 70.6, the permittee shall only operate the CTO cooker associated with (SN-12) up to a total of 4,400 hours per year. Compliance with this condition shall be demonstrated through compliance with Specific Condition 109.

112. Pursuant to §19.705, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of monthly and a twelve

(12) month rolling total of hours of operations for the CTO cooker associated with (SN-12). These records shall be kept on site, made available to Department personnel upon request and submitted in accordance with General Condition 7.

SN-111 and 113
Wet Tall Oil Storage Tanks

Source Description

The wet tall oil storage tanks, tank numbers T-56 and 57, store the product from the CTO cooker until the product can be sold or pumped to storage.

Specific Conditions

113. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
111	VOC	0.1	0.4
113	VOC	0.1	0.4

Dispersed Size Plant Sources

SN-25
Neutral Rosin Adduct Storage Tank

Source Description

The Neutral Rosin Adduct Storage Tanks, tank numbers T- 63, store neutral rosin adduct from the kettle at the rosin size plant which will be used as a raw material at the dispersed size plant.

Specific Conditions

114. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
25	VOC	0.1	0.4

SN-29
Rosin Size Disperser Vessels

Source Description

The Rosin Size Disperser Vessels, R-1 and R-2, take the neutral rosin adduct from tank T- 63 and mix them with premix, which is casein, water, and aqueous ammonia, to produce the dispersed size ammonia.

Specific Conditions

115. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.8	3.5

SN-28 and 116
Dispersed Size Release Tanks

Source Description

The Dispersed Size Release Tanks, tank numbers T- 2 and 3, hold the dispersed size product from the rosin size disperser vessels until it is transferred to the dispersed size product tanks.

Specific Conditions

116. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
28	VOC	0.8	3.5
116	VOC	0.1	0.4

SN-26, 117, 118, and 119
Dispersed Size Product Storage Tanks

Source Description

The Dispersed Size Product Storage Tanks, tank numbers T-59, 60, 61 and 62, store the dispersed size product until it can be loaded onto rail cars or tank trucks for off-site shipment.

Specific Conditions

117. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
26	VOC	0.1	0.4
117	VOC	0.1	0.4
118	VOC	0.1	0.4
119	VOC	0.1	0.4

Rosin Size Plant Sources

SN-120 and 121
Novaflo 50 Storage Tanks

Source Description

The Novaflo 50 Storage Tanks, tank numbers T-11 and 13, store the Novaflo 50 product from the rosin size plant kettle until it can be shipped off-site by railcar or truck.

Specific Conditions

118. 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 this condition will be demonstrated by Plantwide Condition 14.

Source Number	Pollutant	lb/hr	tpy
120	VOC	0.1	0.4
121	VOC	0.1	0.4

SN-122
70% DUF Storage Tank

Source Description

The **70% DUF** Storage Tank, tank number T-14, stores the DUF product from the rosin size plant kettle until it can be shipped off-site by railcar or truck.

Specific Conditions

119. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

SN-41
Dispro Rosin Storage Tank

Source Description

The Dispro Rosin Storage Tank, tank number T-5, stores the Dispro Rosin product from the rosin size plant kettle until it can be shipped off-site by railcar or truck.

Specific Conditions

120. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	0.1	0.4

Derivatives Plant Sources

SN-06
Derivatives Plant Solids Addition Baghouse

Source Description

The Derivatives Plant Solids Addition Baghouse, BH-5, is used to control dust emissions from the low and high volume storage tanks, T-19, T-80, and T-81, which are used as raw materials in the rosin derivatives plant. The collected dust is sent to a landfill.

Specific Conditions

121. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM_{10}	0.4	1.8

122. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM	0.4	1.8

123. Pursuant to §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5 percent opacity as measured by EPA reference method 9. Compliance with this limit shall be demonstrated by Plantwide Condition 16.

SN-07
Derivatives Plant Hot Oil Heater

Source Description

The Derivatives Plant Hot Oil Heater, HOH-2, is a 5.2 MMBtu/hr natural gas fired heater which provides hot oil for the rosin derivatives plant.

Specific Conditions

124. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.4
SO_2	0.1	0.4
VOC	0.1	0.4
CO	0.2	0.9
NO_X	0.6	2.6

125. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM	0.1	0.4

126. Pursuant to §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5 percent opacity as measured by EPA reference method 9. Compliance with this limit shall be demonstrated by natural gas combustion.

SN-09
Derivatives Plant-Flaker Bagging Station

Source Description

The dust emissions from the Derivatives Plant-Flaker Bagging Station are controlled by the baghouse BH-6, SN-09. The captured dust is recycled or sent to a landfill.

Specific Conditions

127. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM_{10}	0.7	3.1
VOC	7.4	2.5

128. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
PM	0.7	3.1
Maliec Anhydride	7.4	2.5

129. Pursuant to §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 5 percent opacity as measured by EPA reference method 9. Compliance with this limit shall be demonstrated by Plantwide Condition 16.

SN-123
Hot Melt Holding Tank

Source Description

The Hot Melt Holding Tank, Tank Number T-51, holds the derivatives plant product until it is sent to the product bagging system. The hot melt holding tank uses steam to keep the product at the desired temperature.

Specific Conditions

130. 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 this condition will be demonstrated by Plantwide Condition 14.

Pollutant	lb/hr	tpy
VOC	1.1	4.6

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Georgia-Pacific Resins, Inc. is in compliance with the applicable regulations cited in the permit application. Georgia-Pacific Resins, Inc. 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. The facility has existing equipment in amino/phenolic resin production which is subject to 40 CFR Part 63, Subpart OOO. This equipment shall be in compliance with this subpart no later than 3 years after January 20, 2000. Georgia-Pacific Resins, Inc. is required, if necessary, to submit an application for a permit modification which will incorporate the Subpart OOO requirements into the Title V permit at least one year prior to the compliance date.

SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.

2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.

3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.

4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:

   a. Sampling ports adequate for applicable test methods
   b. Safe sampling platforms
   c. Safe access to sampling platforms
   d. Utilities for sampling and testing equipment

5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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

Acid Rain (Title IV)

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

Title VI Provisions

8. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:

    a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
    b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
    c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
    d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

9. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

    a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
    b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.

    c. Persons performing maintenance, service repair, or disposal of appliances must be

certified by an approved technician certification program pursuant to §82.161.

d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)
e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

10. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

11. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

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

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

Permit Shield

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

    a. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in a Title V application dated October 7, 1996 and minor source applications dated November 9, 1998, April 14, 1999, July 20, 1999, December 9, 1999, December 13, 1999, February 2, 2000, and April 7, 2000.

Source No.	**Regulation**	**Description**
ICI Formaldehyde Process Line	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G 40 CFR Part 63, Subpart H	National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry. (HON Rule)
Wet Strength Resin Process Line	40 CFR Part 63, Subpart W	National Emission Standards for Hazardous Air Pollutants for the Epoxy Resins Production and Non-Nylon Polyamides Production.
Amino/Phenolic Resin Process Lines	40 CFR Part 63, Subpart OOO 40 CFR Part 63, Subpart SS 40 CFR Part 63, Subpart UU 40 CFR Part 63, Subpart WW	National Emission Standards for Hazardous Air Pollutants for Amino/Phenolic Resins Production. Subpart SS, UU, and WW are standards incorporated by reference from OOO. These subparts are standards for control devices, leak detection, and storage tanks.
SN-130	40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
Tanks listed in Plantwide Conditions 18 and 19.	40 CFR Part 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels
		Compilation of Regulations of the

Facility	Arkansas Regulation 19	Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation 26	Regulations of the Arkansas Operating Air Permit Program

b. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated November 1, 1996, as amended on January 29, 1998 and February 1, 1999.

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	40 CFR Part 60 Subpart Db	SN-05 Pitch Boiler	Not modified since June 9, 1989
Standards of Performance for Equipment Leaks in the Synthetic Organic Chemical Manufacturing Industry	40 CFR Part 60 Subpart VV	Formaldehyde production facility	Formaldehyde production facility has not been modified since installed
Standards of Performance for Volatile Organic Compound Emissions from the Polymer Manufacturing Industry	40 CFR Part 60 Subpart DDD	Facility	The facility does not manufacture any compounds listed in 60.0560 paragraph A.
Standards of Performance for Volatile Organic Compound Emissions from the Synthetic Organic Chemical Manufacturing Industry Air Oxidation Process Unit Processes	40 CFR Part 60 Subpart III	Formaldehyde production facility	The formaldehyde production facility's air oxidation unit has not been modified since it was installed.
Standards of Performance for Volatile Organic Compound Emissions from the Synthetic Organic Chemical Manufacturing Industry Distillation Operations	40 CFR Part 60 Subpart NNN	Formaldehyde production facility	The formaldehyde production facility's distillation tower has not been modified since it was installed.
Standards of Performance for Volatile Organic Compound Emissions from the Synthetic Organic Chemical	40 CFR Part 60 Subpart RRR	Formaldehyde production facility	The formaldehyde production facility does not use a reactor.

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
Manufacturing Industry Reactor Processes			

c. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

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

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

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

14. Pursuant to §19.705, 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 exceed production or process limits specified in the following table for each of the facility's production plants in any consecutive 12 month period. Compliance with this condition will be demonstrated by Plantwide Condition 15.

Production Plant	Consecutive 12 month limit
Rosin Size Plant	90,000,000 pounds of Rosin Size produced
Rosin Derivatives Plant	30,000,000 pounds of Rosin Derivatives produced
Spray Dry Resin	25,000,000 pounds of Spray Dry Powdered Resin produced
Formaldehyde Production Plant	212,000,000 pounds of Formaldehyde produced of which 65,600,000 pounds can be Urea-Formaldehyde Concentrate
Tall Oil Fractionation Plant	280,000,000 pounds of Crude Tall Oil processed

15. Pursuant to §19.705 and 40 CFR Part 52 Subpart E, the permittee shall maintain monthly records of the amounts of product produced or the amount of materials processed as per the limits established in Plantwide Condition 14 at each production plant at the facility. These records shall be updated by the 10th day of the month following the month to which the records pertain. These records shall be kept on sight and made available to Department personnel upon request.

16. Pursuant to 19.702 and 40 CFR 52, Subpart E, the permittee shall conduct weekly observations of the opacity from the sources in the following table and keep a record of these observations.

Source Number	Equipment ID Number
SN-03	BH-4
SN-06	BH-5
SN-09	BH-6
SN-13	BH-2
SN-18	BH-3
SN-19	BH-1

Weekly observations may be performed by plant personnel that are not certified opacity readers. If any visible emissions 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 kept on site and made available to Department personnel upon request.

a. The date and time of the observation and the source observed.
b. If visible emissions were detected.
c. If visible emissions were detected, the cause of the emissions in excess 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 observation.

131. Pursuant to §19.304 and 40 CFR Part 60 Subpart Kb, the facility shall maintain readily accessible records showing the dimension of the storage vessels listed in the table below

and an analysis of the storage capacity of those vessels.

Source Number	Equipment ID	Source Number	Equipment ID
SN-11	T-56	SN-17	NC-1
SN-13	T-57	SN-21	WS-4
SN-15	T-44	SN-22	WS-5
SN-16	T-41	SN-23	WS-6
SN-25	T-63	SN-93	U-12
SN-26	T-62	SN-94	U-13
SN-30	P-11	SN-97	WS-1
SN-31	RM-7	SN-98	WS-2
SN-32	T-47	SN-99	WS-3
SN-35	T-49	SN-101	WS-8
SN-41	T-5	SN-102	WS-7
SN-42	T-6	SN-103	NC-2
SN-50	T-25	SN-104	S-1
SN-54	T-9	SN-105	S-2
SN-57	T-48	SN-107	T-27
SN-58	T-46	SN-108	T-28
SN-64	DETA	SN-109	T-30
SN-76	RM-1	SN-110	T-32
SN-77	RM-2	SN-115	T-38
SN-78	RM-3	SN-117	T-60
SN-79	RM-4	SN-118	T-61
SN-80	RM-5	SN-119	T-59
SN-81	RM-6	SN-120	T-11
SN-85	U-4	SN-121	T-13

Source Number	Equipment ID	Source Number	Equipment ID
SN-88	U-7	SN-122	T-14
SN-90	U-9	SN-123	T-51
SN-91	U-10	SN-124	NC-3
SN-92	U-11	SN-125	Formic
SN-40	T-40		

132. Pursuant to §19.304 and 40 CFR Part 63 Subpart G, the permittee shall maintain readily accessible records showing the dimension of the storage vessels listed in the table below and an analysis of the storage capacity of those vessels. All the listed storage vessels are controlled by SN-11, the RCI incinerator.

Tank ID Number	Description
M-2	Methanol Storage Tank
F1	Formaldehyde Storage Tank
F2	Formaldehyde Storage Tank
F-3	Formaldehyde Storage Tank
F-4	Formaldehyde Storage Tank
F-5	Formaldehyde Storage Tank

133. Pursuant to §19.304 and 40 CFR Part 63 Subpart H, the permittee shall, for all equipment at the ICI formaldehyde plant in organic HAP service, comply with the general standards as outlined in §63.162 of Subpart H and the equipment specific standards outlined in §63.163 to §63.176 of Subpart H.

134. Pursuant to §19.304 and 40 CFR Part 63 Subpart H, the permittee shall, for all equipment

at the ICI formaldehyde plant in organic HAP service, comply with the testing and procedure requirements as outlined in §63.180 of Subpart H.

135. Reporting requirements for the leak detection and repair requirements of 40 CFR Part 63, Subpart H are required in Specific Condition 21.

136. Pursuant to §19.304 and 40 CFR Part 63 Subpart W, the permittee shall comply with the requirements of 40 CFR Part 63 Subpart H to control emissions from equipment leaks from equipment used in the production of wet strength resins.

137. Pursuant to §19.304 and 40 CFR Part 63 Subpart W, the permittee shall, for all equipment at the Liquid Resin Manufacturing plant used to manufacture wet strength resins and which are in organic HAP service, comply with the record keeping and reporting requirements outlined in §63.181 and of Subpart H.

138. Pursuant to §19.304 and 40 CFR Part 63 Subpart W, the permittee shall, for all equipment at the Liquid Resin Manufacturing plant used to manufacture wet strength resins and which are in organic HAP service, comply with the general standards as outlined in §63.162 of Subpart H and the equipment specific standards outlined in §63.163 to §63.176 of Subpart H.

139. Pursuant to §19.304 and 40 CFR Part 63 Subpart W, the permittee shall, for all equipment at the Liquid Resin Manufacturing plant used to manufacture wet strength resins and which are in organic HAP service, comply with the testing and procedure requirements as outlined in §63.180 of Subpart H.

140. Pursuant to §19.304 and 40 CFR Part 63 Subpart W, the permittee shall, for all equipment at the Liquid Resin Manufacturing plant used to manufacture wet strength resins and which are in organic HAP service, comply with the record keeping and reporting requirements outlined in §63.181 and of Subpart H.

SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated October 7, 1996 and July 18, 2000.

Description	Equipment ID	Category

Georgia-Pacific Resins, Inc.
Permit #: 1177-AOP-R1
CSN #: 02-0028

Description	Equipment ID	Category
Liquid Resin Manufacturing		
Acid Quench Tank	AQ-1	A-13
Chilled Water Storage Tank	CWT-1	B-21
Emergency Generator Diesel Fuel Tank	DF-2	A-3
Urea Storage Silo	D-3	A-13
Emergency Generator	GEN-1	A-12
Kettle Emergency Emissions Containment (KEEC) Tank	─26	A-13
Sodium Hydroxide Storage Tank	M-4	A-4
Epichlorohydrin Storage Tank	M-7	A-13
Aqua Ammonia Storage Tank	M-14	B-21
Sodium Hydroxide Storage Tank	M-19	A-4
Resi-Mix Resin Wastewater Tank	M-22	B-21
Sulfuric Acid Storage Tank	M-9	B-21
K-1 and K-2 Urea Feed Hopper	UH-1	A-13
K-3 Urea Feed Hopper	UH-2	A-13
Sodium Hydroxide Process Weigh Tank	W-1	A-4
Sodium Hydroxide Process Weigh Tank	W-2	A-4
Four Water Treatment Storage Tanks	WTT-1	B-44
UNICREPE Storage Tank	UC-1	A-13
Formaldehyde Manufacturing		
Condensate Knock Out Pot	M-9	A-3
Sodium Hydroxide Storage Tank	M-19	A-4
Steam Condensate Storage Tank	M-25	B-21

Georgia-Pacific Resins, Inc.
Permit #: 1177-AOP-R1
CSN #: 02-0028

Description	Equipment ID	Category
UFC Manufacturing		
RCI Distillate Tank	M-10	B-21
Urea Solution Mix Tank	M-16	B-21
Spray Dry Manufacturing		
Process Water Tank	S-4	B-21
Carbon Dioxide Storage Tank	CO-1	A-13
Chilled Water Storage Tank	CWT-2	B-21
Hexamine Storage Tank	S-3	B-21
TOFRAC Plant		
Liquid Nitrogen Storage Tank	NIT-1	B-21
Water Treatment Storage Tanks	WTT-3	B-44
Crude Tall Oil Debrine Storage Tank	T-3	B-21
Crude Tall Oil Debrine Storage Tank	T-4	B-21
Crude Tall Oil Debrine Storage Tank	T-5	B-21
Condensate Storage Tank	T-37	B-21
Crude Tall Oil Debrine Storage Tank	T-54	B-21
Crude Tall Oil Debrine Storage Tank	T-69	B-21
Therminol Surge Tank	V-701	A-3
Therminol Surge Tank	V-702	A-3
Crude Tall Oil Acidulation Plant		
Tall Oil Soap Skimmings Storage Tank	T-1	A-13
Crude Tall Oil Debrine Storage Tank	T-2	B-21
Sodium Hydroxide Storage Tank	T-53	A-4
Neutral Brine Storage Tank	T-58	B-21
Virgin Sulfuric Acid Storage Tank	T-68	B-21

Georgia-Pacific Resins, Inc.
Permit #: 1177-AOP-R1
CSN #: 02-0028

Description	Equipment ID	Category
Chill Water Storage Tank	CWT-2	B-21
Dispersed Size Plant		
Casing Mix Tank	CT-61	B-21
Casing Mix Tank	CT-62	B-21
Brine Mix Storage Tank	T-86	B-21
Rosin Size Plant		
Sodium Hydroxide Storage Tank	T-15	A-4
Potassium Hydroxide Storage Tank	T-16	A-4
TX Acid/H2SO4 Storage Tank	T-76	B-21
Brine Mix Storage Tank	T-79	B-21
NaOH/KOH and Water Dilution Tank	T-84	A-4
Rosin Derivatives Plant		
Glycerol Storage Tank	T-77	A-3
Ethanox Storage Tank	T-83	B-21
Water Treatment Storage Tank	WTT-2	B-44
Entire Complex		
Caustic Cleaning Vats-Maintenance Dept.	CV-1	B-14
Caustic Cleaning Vats-Maintenance Dept.	CV-2	B-14
Diesel Fuel Storage Tank for Plant Vehicles	DF-1	A-3
Welding - Maintenance Dept.	N/A	B-14
Grinding and Cutting - Maintenance Dept.	N/A	B-14
Boiler Water Chemical Treatment Tanks	N/A	B-44
Propane Storage Tank	PRO-1	A-13
Propane Storage Tank	PRO-2	A-13
Mineral Spirits Parts Washer - Maintenance Dept.	PW-1	B-14

Georgia-Pacific Resins, Inc.
Permit #: 1177-AOP-R1
CSN #: 02-0028

Description	Equipment ID	Category
Truck Washing	TW-1	B-14
Rosin Drumming Melter		A-13
KEEC Tank	KEEC2	A-13
Dowtherm Storage Tank	M-18	A-3
Cashew Nut Oil Storage Tank	M-6	A-13

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

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.

2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.

3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.

4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.

5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:

    a. The date, place as defined in this permit, and time of sampling or measurements;
    b. The date(s) analyses were performed;
    c. The company or entity that performed the analyses;
    d. The analytical techniques or methods used;
    e. The results of such analyses; and
    f. The operating conditions existing at the time of sampling or measurement.

6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

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

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:

    a. The facility name and location,
    b. The process unit or emission source which is deviating from the permit limit,
    c. The permit limit, including the identification of pollutants, from which deviation occurs,
    d. The date and time the deviation started,
    e. The duration of the deviation,
    f. The average emissions during the deviation,
    g. The probable cause of such deviations,
    h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
    i. The name of the person submitting the report.

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

9. Pursuant to 40 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A.§8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.

10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.

14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.

15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.

16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.

17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.

18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.

20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:

    a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
    d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.

21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:

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

22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:

    a. The provisions of Section 303 of the Act (emergency orders) ,

including the authority of the Administrator under that section;

b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX H

40 CFR 63, Subpart UU

Request for PDS Invoice	
Invoice Number *(assigned when invoice printed)*	PDS-

AFIN r	02-00028			
Name *(for confirmation only)*	Georgia Pacific Resins, Inc			
Invoice Type (pick one) r	Initial	Mod X	Variance	
	Annual	Renewal	Interim Authority	
Permit Number r	1177-AOP-R1			
Media Code r	A			
Fee Code or Pmt Type r	T5			
Fee Description *(for confirmation only)*	Title V			
Amount Due r *(whole dollar amount only)*	$500			
Printed Comment *(600 characters maximum)*	minimum fee			

Note: The information below is for use by the requesting division if desired; it will not print on the invoice.	
Engineer	Charles Hurt
Paid? (yes/no)	
Check number	
Comments	

r **Required data***(See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)*

Request submitted by:		Date:	

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 602, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Georgia-Pacific Resins, Inc.(GPRI), a subsidiary of Georgia-Pacific Corporation, operates a resin, formaldehyde, and tall oil manufacturing facility located at Highway 82 and Paper Mill Road in Crossett, Arkansas. GPRI is increasing the hourly VOC emission rate to 3.0 lb/hr and reduce the hours of operation to 4,400 hr/year for the CTO cooker (SN-12). The facility is not increasing the annual VOC emissions at SN-12. GPRI is also constructing a 835,000 gallon tank (SN-40) to store crude tall oil (CTO). The emissions from the new tank will be 0.1 lb/hr and 0.4 tpy of VOC.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact Charles Hurt, Engineer. Both Doug Szenher and Charles Hurt can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Paul Sullins Public Library on 125 Main, Crossett AR 71635. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Doug Szenher. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Marcus C. Devine
Director