ADEQ
OPERATING
AIR PERMIT

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

Permit No. : 1177-AOP-R6

IS ISSUED TO:

Georgia-Pacific Resins, Inc.

Highway 82 and Paper Mill Road

Crossett, AR 71635

Ashley County

AFIN: 02-00028

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

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

May 5, 2005

Date Modified

Facility: Georgia-Pacific Resins, Inc.
Permit No.: 1177-AOP-R6
AFIN: 02-00028

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Table 1 - List of Acronyms

A.C.A.	Arkansas Code Annotated
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CSN	County Serial Number
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate matter
PM_{10}	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO_2	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	Georgia-Pacific Resins, Inc
AFIN:	02-00028
PERMIT NUMBER:	1177- AOP-R6
FACILITY ADDRESS:	Highway 82 and Paper Mill Road Crossett, AR 71635
MAILING ADDRESS	Highway 82 and Paper Mill Road Crossett, AR 71635
COUNTY:	Ashley
CONTACT POSITION:	Richard Byrd
TELEPHONE NUMBER:	(803) 782-5890 Ext. 11
REVIEWING ENGINEER:	Charles Hurt
UTM North - South (Y):	Zone 15 3667.0
UTM East - West (X):	Zone 15 596.3

Section II: INTRODUCTION

Summary of Permit Activity

Georgia Pacific Resins, Inc. located on Highway 82 & Papermill Road, Crossett, Arkansas 71635 submitted applications requesting a change in service for two storage tanks (SN-17 and SN-60). DETA resin is currently stored in SN-17 to be replaced by another resin, Novacote. The two resins, on a VOC emission rate basis, are equivalent. Cresylic Acid is currently stored in SN-60 to be replaced by Secondary Butylphenols. The two organic compounds, on a VOC as well as HAP emission rate basis, are equivalent. VOC emissions from each tank are 0.1 lb/hr and 0.4 tpy. GPRI also requested to re-melt and fuel blend old rosin material from a current stockpile and sample rosin generated on a daily basis. The fuel blend is to be combusted in the Pitch Boiler (SN-05). Combustion of the fuel blend is considered to be an insignificant activity. Lastly, the requirement that a six hour period must elapse between start up of Lytor 105k batches was removed because batch times are at least 12 hours and there is only one reaction vessel used for production of the resin. As a result of the requested modification permitted Phenol emissions increased by 0.10 lb/hr and 0.40 tpy.

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

Regulations

The following table contains the regulations applicable to this permit.

Table 2 - Regulations

Source No.	Regulation Citations
Facility	Regulation 18, *Arkansas Air Pollution Control Code*
Facility	Regulation 19, *Regulations of the Arkansas Plan of Implementation for Air Pollution Control*
Facility	Regulation 26, Regulations of the Arkansas Operating Air Permit Program
Facility	40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*
Facility	40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels*
Facility	40 CFR Part 63, Subpart F – *National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry*
Facility	40 CFR Part 63, Subpart G – N*ational Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater*
Facility	40 CFR Part 63, Subpart H – *National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks*
Facility	40 CFR Part 63, Subpart W – *National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non - Nylon Polyamides Production,*
Facility	40 CFR Part 63, Subpart SS – *National Emission Standard for Closed Vent Systems, Control Devices, Recovery Devices and Pouting to a Fuel Gas System or a Process*
Facility	40 CFR Part 63, Subpart UU – *National Emission Standards for Equipment Leaks - Control Level 2 Standards*
Facility	40 CFR Part 63, Subpart WW – *National Emission Standards for Storage Vessels (Tanks)- Control Level 2*
Facility	40 CFR Part 63, 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. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

Table 3 – Emission Summary

EMISSION SUMMARY						
Source No.	**Equip. ID**	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
				lb/hr	**tpy**	
Total Allowable Emissions			PM	89.5	294.9	N/A
			PM_{10}	89.5	294.9	
			SO_2	14.6	61.9	
			VOC	52.3	175.7	
			CO	23.0	87.6	
			NO_X	32.7	132.6	
			H_2S	0.30	1.30	
			H_2SO_4	0.10	0.40	
			Total Iodine	4.17	2.50	
			Formic Acid	0.10	0.44	
			Nonylphenol	0.03	0.13	
			HAPs			
			Epichlorohydrin*	0.10	0.40	
			Formaldehyde*	11.22	44.25	
			Maleic Anhydride*	7.40	2.50	
			Methanol*	7.70	33.90	
			O-Cresol*	0.10	0.40	
			Phenol*	5.00	21.10	
SN-01	HOH-1	Hot Oil Heater for TOFRAC Plant (43.6 MMBTU/hr)	PM	0.6	2.6	65
			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 MMBTU/hr)	PM	22.2	97.2	58
			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	7.20	31.50	
			Phenol	2.30	10.10	
			Methanol	5.30	23.20	
SN-05	B-1	Pitch Boiler/VOC Control System (94.1 MMBTU/hr)	PM	35.0	180.6	27
			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	
			Total Iodine	4.17	2.50	
SN-06	BH-5	Derivatives Plant	PM	0.4	1.8	90

EMISSION SUMMARY						
Source No.	**Equip. ID**	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
				lb/hr	**tpy**	
		Solids Addition Baghouse	PM_{10}	0.4	1.8	
SN-07	HOH-2	Derivatives Plant Hot Oil Heater (5.2 MMBTU/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	91
SN-09	BH-6	Derivatives Plant Flaker Bagging Station	PM PM_{10} VOC Maleic Anhydride	0.7 0.7 7.4 7.40	3.1 3.1 2.5 2.50	92
SN-10	OX-1	ICI Formaldehyde Process Oxidizer (2.0 MMBTU/hr)	PM PM_{10} SO_2 VOC CO NO_X Formaldehyde Methanol	0.2 0.2 0.1 1.7 0.2 0.9 0.40 1.30	0.9 0.9 0.4 7.7 0.9 3.9 1.80 5.90	62
SN-11	OX-2	RCI Oxidizer Emissions from UFC-Formaldehyde process, Resin kettles, Formaldehyde Storage tanks, UFC storage tanks, Methanol Storage Tanks (4.8 MMBTU/hr)	PM PM_{10} SO_2 VOC CO NO_X Epichlorohydrin Formaldehyde Methanol Phenol	0.1 0.1 0.1 2.0 4.7 0.5 0.10 0.30 0.90 0.10	0.4 0.4 0.4 8.8 20.6 2.2 0.40 1.00 3.90 0.40	30
SN-12	SCRU B-1	Crude Tall Oil Acidulation Plant Scrubber	PM PM_{10} SO_2 VOC H_2S $H2SO_4$ Methanol	0.7 0.7 1.9 5.0** 0.30 0.10 0.20	3.1 3.1 8.3 6.6 1.30 0.40 0.90	77
SN-13	BH-2	Resi-Mix Process Feed System Baghouse	PM PM_{10}	0.1 0.1	0.4 0.4	39

EMISSION SUMMARY						
Source No.	**Equip. ID**	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
				lb/hr	**tpy**	
SN-14	T-43	Tall Oil Fatty Acid Storage Tank 133,501 gal	VOC	0.1	0.4	70
SN-15	T-44	Tall Oil Fatty Acid Storage Tank 80,737 gal	VOC	0.1	0.4	70
SN-16	T-41	Crude Tall Oil Storage Tank 835,176 gal	VOC	0.1	0.4	66
SN-17	NC-1	Novacote Storage Tank 32,130 gal	VOC	0.1	0.4	46
SN-18	BH-3	Resi-Mix Process Mixer	PM PM_{10}	0.1 0.1	0.4 0.4	40
SN-19	BH-1	Styrene-Maleic Anhydride Feed Hoppers and Grinder	PM PM_{10}	0.1 0.1	0.4 0.4	41
SN-20	T-42	Crude Tall Oil Storage Tank 835,176 gal	VOC	0.1	0.4	66
SN-21	WS-4	Wet Strength Resin Storage Tank 30,932 gal	VOC	0.1	0.4	53
SN-22	WS-5	Wet Strength Resin Storage Tank 30,932 gal	VOC	0.1	0.4	53
SN-23	DS-1	Dry Strength Resin Storage Tank 30,932 gal	VOC	0.1	0.4	53
SN-24	T-21	Tall Oil Rosin Storage Tank 25,366 gal	VOC	0.3	1.3	71
SN-25	T-63	Neutral Rosin Adduct Storage Tank	VOC	0.1	0.4	81

EMISSION SUMMARY						
Source No.	**Equip. ID**	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
				lb/hr	**tpy**	
		32,130 gal				
SN-26	T-62	Dispersed Size Product Storage Tank 32,130 gal	VOC	0.1	0.4	84
SN-28	T-2	Dispersed Size Release Tank 4,134 gal	VOC	0.1	0.4	83
SN-29	R-1, R-2	Rosin Size Disperser Vessels 753 gal Each	VOC	0.8	3.5	82
SN-30	P-11	PF Resin Storage Tank 21,138 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	47
SN-31	RM-7	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.10	0.4 0.40	49
SN-32	T-47	Pitch Storage Tank 72,159 gal	VOC	0.1	0.4	67
SN-33	T-20	Heads 2 Storage Tank 25,366 gal	VOC	0.1	0.4	69
SN-34	T-31	Heads 2 Storage Tank 25,366 gal	VOC	0.1	0.4	69
SN-35	T-49	Tall Oil Rosin Storage Tank 146,795 gal	VOC	0.1	0.4	71
SN-36	T-26	502 Bottoms Storage Tanks 27,057 gal	VOC	0.1	0.4	72
SN-37	T-50	Rosin Druming Tank and Druming Station 5,707 gal	VOC	0.1	0.4	75
SN-40	T-40	Crude Tall Oil Storage Tank 835,000 gal	VOC	0.1	0.4	66
SN-41	T-5	Dipro Rosin Storage Tank	VOC	0.1	0.4	88

EMISSION SUMMARY						
Source No.	**Equip. ID**	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
				lb/hr	**tpy**	
		30,439 gal				
SN-42	T-6	Distilled Tall Oil Storage Tank 30,439 gal	VOC	0.3	0.9	73
SN-43	T-24	Pitch Storage Tank 30,439 gal	VOC	0.1	0.4	67
SN-44	T-36	Pitch Storage Tank 18,602 gal	VOC	0.1	0.4	67
SN-45	T-19	Heads 2 Storage Tank 25,366 gal	VOC	0.1	0.4	69
SN-46	T-22	Tall Oil Fatty Acid Storage Tank 25,366 gal	VOC	0.1	0.4	70
SN-47	T-29	Heads 2 Storage Tank 25,366 gal	VOC	0.1	0.4	69
SN-48	T-17	Tall Oil Fatty Acid Storage Tank 25,366 gal	VOC	0.1	0.4	70
SN-49	T-18	Tall Oil Fatty Acid Storage Tank 25,366 gal	VOC	0.1	0.4	70
SN-50	T-25	502 Bottoms Storage Tank 25,366 gal	VOC	0.1	0.4	72
SN-51	7-23	Distilled Tall Oil Tank 25,366 gal	VOC	0.1	0.4	73
SN-52	T-7	Tall Oil Rosin Storage Tank 25,366 gal	VOC	0.1	0.4	71
SN-53	T-8	Tall Oil Rosin Storage Tank 25,366 gal	VOC	0.1	0.4	71
SN-54	T-9	Tall Oil Rosin Storage tank	VOC	0.1	0.4	71

EMISSION SUMMARY						
Source No.	**Equip. ID**	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
				lb/hr	**tpy**	
		29,934 gal				
SN-55	T-10	Tall Oil Rosin Storage Tank 25,366 gal	VOC	0.1	0.4	71
SN-56	T-12	Tall Oil Rosin Storage Tank 25,366 gal	VOC	0.1	0.4	71
SN-57	T-48	Tall Oil Fatty Acid Storage Tank 48,102 gal	VOC	0.1	0.4	70
SN-58	T-46	Tall Oil Fatty Acid Storage Tank 146,795 gal	VOC	0.1	0.4	70
SN-59	M-3	Phenol Process Water Storage Tank 11,274 gal	Removed from Service			N/A
SN-60	M-5	Cresylic Acid/Secondary Butylphenols Storage Tank 21,138 gal	VOC Phenol Cresols	0.1 0.10 0.10	0.4 0.40 0.40	42
SN-61	--	Phenol Distillate Storage Tank 23,487 gal	VOC Phenol	0.1 0.10	0.4 0.40	43
SN-62	M-8	Phenol Storage Tank 133,501 gal	VOC Phenol	0.6 0.60	2.6 2.60	44
SN-63	P-8	Pre-Polymer Storage Tank 25,366 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	P-12	Pre-Polymer Storage Tank 37,053 gal	VOC	0.1	0.4	45
SN-66	P-1	PF Resin Storage Tank	VOC Formaldehyde	0.2 0.10	0.9 0.40	47

EMISSION SUMMARY						
Source No.	**Equip. ID**	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
				lb/hr	**tpy**	
		14,680 gal	Phenol	0.10	0.40	
SN-67	P-2	PF Resin Storage Tank 17,6015 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	47
SN-68	P-3	PF Resin Storage Tank 14,680 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	47
SN-69	P-5	PF Resin Storage Tank 14,680 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	47
SN-70	T-70	Nonylphenol Storage Tank 15,000 gal	VOC Nonylphenol	0.1 0.03	0.2 0.13	95
SN-71	P-6	PF Resin Storage Tank 14,680 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	47
SN-72	P-7	PF Resin Storage Tank 21,138 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	47
SN-73	P-9	PF Resin Storage Tank 21,138 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	47
SN-74	P-10	PF Resin Storage Tank 21,138 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	47
SN-76	RM-1	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.10	0.4 0.40	49
SN-77	RM-2	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.10	0.4 0.40	49
SN-78	RM-3	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.10	0.4 0.40	49
SN-79	RM-4	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.10	0.4 0.40	49
SN-80	RM-5	Resi-Mix Resin Storage Tank 31,285 gal	VOC Formaldehyde	0.1 0.10	0.4 0.40	49
SN-81	RM-6	Resi-Mix Resin	VOC	0.1	0.4	49

EMISSION SUMMARY						
Source No.	**Equip. ID**	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
				lb/hr	**tpy**	
		Storage Tank 31,285 gal	Formaldehyde	0.10	0.40	
SN-83	U-2	UF Resin Storage Tank 25,366 gal	Removed From Service			N/A
SN-84	U-3	UF Resin Storage Tank 25,366 gal	Removed From Service			N/A
SN-85	U-4	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	50
SN-86	U-5	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	50
SN-87	U-6	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	50
SN-88	U-7	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	50
SN-89	U-8	UF Resin Storage Tank 25,366 gal	Removed From Service			N/A
SN-90	U-9	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	50
SN-91	U-10	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	50
SN-92	U-11	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	50
SN-93	U-12	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	50
SN-94	U-13	UF Resin Storage Tank 25,366 gal	VOC Formaldehyde Phenol	0.2 0.10 0.10	0.9 0.40 0.40	50
SN-95	W-3	DETA, Phenol, UFC, HCHO, Pre-Polymer	VOC Total HAP	0.1 0.10	0.4 0.25	52

EMISSION SUMMARY						
Source No.	**Equip. ID**	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
				lb/hr	**tpy**	
		Process Weight Tank 9,710 gal				
SN-97	WS-1	Wet Strength Resin Storage Tank 25,366 gal	VOC	0.1	0.4	53
SN-98	WS-2	Wet Strength Resin Storage Tank 25,366 gal	VOC	0.1	0.4	53
SN-99	WS-3	Wet Strength Resin Storage Tank 13,529 gal	VOC	0.1	0.4	53
SN-100	WS-6	Wet Strength Resin Storage Tank 13,529 gal	VOC	0.1	0.4	53
SN-101	WS-8	Wet Strength Resin Storage Tank 30,932 gal	VOC	0.1	0.4	53
SN-102	WS-7	Wet Strength Resin Storage Tank 30,932 gal	VOC	0.1	0.4	53
SN-103	NC-2	Novacote Resin Storage Tank 30,932 gal	VOC	0.1	0.4	54
SN-104	S-1	Liquid Base Resin Storage Tank 24,521 gal	VOC Formaldehyde	0.1 0.10	0.4 0.40	60
SN-105	S-2	Liquid Base Resin Storage Tank 24,521 gal	VOC Formaldehyde	0.1 0.10	0.4 0.40	60
SN-106	T-34	Heads 1 Storage Tank 835,176 gal	VOC	0.1	0.4	68

EMISSION SUMMARY						
Source No.	**Equip. ID**	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
				lb/hr	**tpy**	
SN-107	T-27	Tall Oil Blend Tank 30,439 gal	VOC	0.1	0.4	74
SN-108	T-28	Tall Oil Blend Tank 30,439 gal	VOC	0.1	0.4	74
SN-109	T-30	Tall Oil Blend Tank 30,439 gal	VOC	0.1	0.4	74
SN-110	T-32	Tall Oil Blend Tank 16,911 gal	VOC	0.1	0.4	74
SN-111	T-56	Wet Tall Oil Storage Tank 27,500 gal	VOC	0.1	0.4	79
SN-113	T-57	Wet Tall Oil Storage Tank 36,100 gal	VOC	0.1	0.4	79
SN-116	T-3	Dispersed Size Release Tank 4,134 gal	VOC	0.1	0.4	83
SN-117	T-60	Dispersed Size Product Storage Tank 32,130 gal	VOC	0.1	0.4	84
SN-118	T-61	Dispersed Size Product Storage Tank 32,130 gal	VOC	0.1	0.4	84
SN-119	T-59	Dispersed Size Product Storage Tank 32,130 gal	VOC	0.1	0.4	84
SN-120	T-11	Novaflo 50 Storage Tank 25,366 gal	VOC	0.1	0.4	86
SN-121	T-13	Novaflo 50 Storage Tank 25,366 gal	VOC	0.1	0.4	86
SN-122	T-14	DUF 70% Storage Tank	VOC	0.1	0.4	87

EMISSION SUMMARY						
Source No.	**Equip. ID**	**Description**	**Pollutant**	**Emission Rates**		**Cross Reference Page**
				lb/hr	**tpy**	
		25,366 gal				
SN-123	T-51	Hot Melt Holding Tank 15,220 gal	VOC	1.1	4.6	93
SN-124	NC-3	Novacote Resin Tank 13,000 gal	VOC	0.1	0.4	54
SN-125	Formic	Formic Acid Storage Tank 10,000 gal	VOC Formic Acid	0.1 0.10	0.5 0.44	55
SN-129	OX-3	Thermal Oxidizer	PM PM_{10} SO_2 VOC CO NO_X Total Iodine	0.3 0.3 1.2 0.5 0.8 0.4 4.17	1.4 1.4 5.4 2.2 3.3 1.7 2.50	34
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	36
SN-132	WSLOAD1	Wet Strength Resin Loading Rack	VOC	0.1	0.2	56
SN-133	WSLOAD2	Wet Strength Resin Loading Rack	VOC	0.1	0.2	56
SN-134	--	SCRUB-2B Waste Water Processing	VOC Formaldehyde	1.1 1.02	1.0 0.95	94

* Included in VOC total
**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 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 addressed 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 addressed 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 allowed 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 Dipro 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 included 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.

Air Permit 1177-AOP-R1 was issued on February 21, 2003. The facility requested 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 did not increase the annual VOC emissions at SN-12. GPRI also requested to construct a 835,000 gallon tank (SN-40) to store crude tall oil (CTO). The emissions from SN-40 were 0.1 lb/hr and 0.4 tpy of VOC. The semiannual reporting requirements were removed from Specific Conditions 5, 36, and 105.

Air Permit 1177-AOP-R2 was issued on September 12, 2003. GPRI submitted applications requesting the following:

1. Included the production of Phenolic Rosin Resin (PRR);
2. To allow a change in service for the storage tank SN-17 and weight tank W-3 (SN-95); and
3. Allow GPRI to use Method 320 in lieu of Method 18; and
4. Install a new loading rack (SN-133), a new 30,000 gal urea solution storage tank, two new 30,000 gal wet strength resin (WSR) tanks (SN-101 and SN-102), and a 7,343 gal wet strength resin and urea dilute tank.

The modification resulted in an increase of VOC by 1.2 tpy and HAPs by 0.044 tpy.

Air Permit 1177-AOP-R3 was issued on December 5, 2003, to allow products from the CTO to be produced in shorter batch times. As a result of shorter batch times, the hourly VOC limit for the CTO Acidulation Scrubber (SN-12) will be increase to 5.0 lb/hr. The hours of operation for SN-12 will be reduced to 2,640 hours/yr in order to maintain the current annual limit of 6.6 tpy. GPRI also requested to add a 20,000 Phenol Distillate Storage Tank (PD-1). PD-1 will be considered an insignificant activity since VOC emissions from PD-1 are less than 2.81 lb/yr.

Air Permit 1177-AOP-R4 was issued on June 21, 2004, to allow SCRUB-2B to operate with additional modes of operation for processing gas fed to the VOC control system. The initial purpose of SCRUB-2B was to condense steam and remove iodides generated during Lytor production. It now also reduces the concentration of formaldehyde, from DUF 70 production.

SCRUB-2B was modified such that only stage 1 operates during the production of DUF 70. However, during Lytor operation or operation resulting in a halogenated waste gas, SCRUB-2B will continue to operate all three stages in accordance with Specific Condition #6. The water from SCRUB-2B will be sent to an oil/water separator and the facility's waste water collection area (SN-134). GPRI also changed service for an existing 15,000 gallon tank, SN-70, to be used to store Nonylphenol.

Air Permit 1177-AOP-R5 was issued on October 27, 2004, to allow an increase in production of a resin, Lytor 105k to 100 batches per year. The gas from the production of Lytor 105k is sent to the Pitch Boiler (SN-05) to be combusted. GPRI also requested the hourly permitted iodine limit for SN-05 to be a batch average and to include Total Iodine compounds. As a result of the increased production of the resin, total iodine emissions from SN-05 increased by 0.47 lb/hr (batch average) and 2.0 tpy.

Section IV: SPECIFIC CONDITIONS

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 (SCRUB-2B) 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

1. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #7. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 4 – Pitch Boiler Maximum Criteria Emission Rates

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

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #7. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 5 – Pitch Boiler Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM (normal) (Sootblowing)	35.0 85.0	180.6
Total Iodine	4.17*	2.50

*** Batch Average**

3. 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. [Regulation No. 19 §19.503 and 40 CFR Part 52, Subpart E]

4. 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. [Regulation No. 19 §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]

5. 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: [Regulation No. 19 §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]

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

6. The permittee shall operate SCRUB-2B as specified in the following sub-conditions:

    a. During production of Lytor 105k or while gas which contain halogens is fed to the VOC control system, the permittee shall maintain a scrubbing liquid with a pH of at least 9.0 and a minimum flow rate 10 gallons per minute in the third stage of SCRUB-2B. The permittee shall maintain records of the scrubbing liquid flow rate and pH prior to each batch of Lytor 105k. These records shall be kept on site and made available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

    b. During production of DUF 70, the permittee shall maintain a scrubbing liquid with a minimum flow rate of 80 gallons per minute in first stage of the scrubber. The permittee shall maintain records of the scrubbing liquid flow rate in the first stage of the scrubber prior to each batch of DUF 70. These records shall be kept on site and made available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. 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. [Regulation No. 19 §19.503 and 40 CFR Part 52, Subpart E]

8. 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. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

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

9. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #16 and Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 6 – Maximum RCI UFC Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.4
SO_2	0.1	0.4
VOC	2.0	8.8
CO	4.7	20.6
NO_X	0.5	2.2

10. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #16 and Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 7 – Maximum RCI UFC Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.1	0.4
Formaldehyde	0.30	1.00
Phenol	0.10	0.40
Methanol	0.90	3.90
Epichlorohydrin	0.10	0.40

11. 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. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

12. 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 Condition #16. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart G, §63.119(e)1-5]

13. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart OOO, §63.1406(a)(2)ii]

14. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart G, §63.119(e)3]

15. The permittee shall maintain a record of all planned routine maintenance for the RCI UFC/Formaldehyde Manufacturing Process Oxidizer, OX-1, SN-11. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

16. The permittee shall maintain a fire box temperature of 1250 °F 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. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart G, §60.120(d)5, and 40 CFR Part 63, Subpart OOO, §63.1425(d)(1)]

17. 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. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart G, and 40 CFR Part 63, Subpart OOO]

18. 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. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart G, and 40 CFR Part 63, Subpart OOO]

19. The permittee shall conduct an 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). [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart OOO, §63.1413, and 40 CFR Part 63, Subpart SS, §63.98]

20. 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). [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart G]

21. The permittee shall submit periodic reports as outlined in §63.152(c). [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart G]

22. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart G, §63.130(f)]

23. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart OOO, §63.1415(d)(1)]

24. The permittee shall develop, implement and maintain a startup, shutdown, and malfunction plan prior to January 20, 2003. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart OOO, §63.1416]

25. The permittee shall comply with the equipment leak provisions of 40 CFR Part 63, Subpart UU. The provisions of Subpart UU include: [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart OOO, §63.1410]

    a. Identifying all equipment subject to Subpart UU - §63.1022
    b. Conducting monitoring for leaks - §63.1022

c. Maintain records for equipment subject to Subpart UU - §63.1038
d. Reporting is required in the Periodic Reports of Subpart OOO in Specific Condition #28.

26. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart OOO, §63.1417(d)]

27. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart OOO, §63.1417(e)]

28. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart OOO, §63.1417(f)]

29. The permittee shall submit start-up, shutdown, and malfunction reports on the same schedule as the Periodic Reports in Specific Condition #28. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart OOO, §63.1417(g)]

30. The permittee shall submit other reports as required by §63.1417(h). These reports shall include: [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart OOO, §63.1417(h)]

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 to 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

31. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Specific Conditions #35 and #37. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 8 – Thermal Oxidizer Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.3	1.4
SO_2	1.2	5.4
VOC	0.5	2.2
CO	0.8	3.3
NO_X	0.4	1.7

32. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Specific Conditions #35 and #37. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 9 – Thermal Oxidizer Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.3	1.4
Total Iodine	4.17*	2.50

*** Batch Average**

33. 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. [Regulation No. 19 §19.503 and 40 CFR Part 52, Subpart E]

34. 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. [Regulation No. 19 §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]

35. The permittee shall maintain a temperature of 1500 °F 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. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

36. 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. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

37. 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 #31 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. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]

38. 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. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

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

39. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #42. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 10 – Package Boiler Maximum Criteria Emission Rates

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

40. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #42. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 11 – Package Boiler Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.7	2.2

41. 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. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

42. 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. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

43. 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 Provision #7. [Regulation No. 19 §19.304 and 40 CFR Part 60 Subpart Dc]

Liquid Resins 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

44. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 12 – Resi-Mix Feed System Baghouse Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.4

45. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 13 – Resi-Mix Feed System Baghouse Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.1	0.4

46. 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 through compliance with Plantwide Condition #15. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

47. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 14 – Resi-Mix Process Mix Tank Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.4

48. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 15 – Resi-Mix Process Mix Tank Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.1	0.4

49. 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 through compliance with Plantwide Condition #15. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-19

SMA 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

50. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 16 – SMA Hoppers and Grinders Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.4

51. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 17 – SMA Hoppers and Grinders Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.1	0.4

52. 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 through compliance with Plantwide Condition #15. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-60

Cresylic Acid/Secondary Butylphenol Storage Tank

Source Description

The Cresylic Acid Storage Tank, M-5, provides cresylic acid as a raw material to the liquid resin kettles. This tank may also be used to store secondary butylphenols which are on VOC basis equivalent to Cresylic Acid.

Specific Conditions

53. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 18 – Cresylic Acid/Sec-Butylphenol Storage Tank Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	0.1	0.4

54. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 19 – Cresylic Acid Storage/Sec-Butylphenol Tank Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
Cresol	0.10	0.40
Phenol	0.10	0.40

SN-61

Phenol Distillate Storage Tank

Source Description

Phenol Distillate is stored in this tank.

Specific Conditions

55. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 20 – Phenol Distillate Storage Tank Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	0.1	0.4

56. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 21 – Phenol Distillate Storage Tank Maximum Non-Criteria Emission Rates

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

57. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 22 – Phenol Storage Tank Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	0.6	2.6

58. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 23 – Phenol Storage Tank Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
Phenol	0.6	2.6

SN-63 and SN-65

Pre-Polymer Storage Tanks

Source Description

The Pre-Polymer Storage Tanks, P-8 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

59. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 24 – Phenol Storage Tank Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
63	VOC	0.1	0.4
65	VOC	0.1	0.4

SN-17 and SN-64

Novacote and DETA Storage Tanks

Source Description

The Novacote (SN-17) and DETA (SN-64)Storage Tanks provide raw material for kettles. The resin can be processed through either a mass flow meter or a process weigh tank (W-3) which send the proper amount of resin to the kettles.

Specific Conditions

60. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 25 – Novacote and DETA Storage Tanks Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
17	VOC	0.1	0.4
64	VOC	0.1	0.4

SN-30, SN-66, SN-67, SN-68, SN-69, SN-71, SN-72, SN-73, and SN-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

61. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 26 – PF Resin Storage Tanks Maximum Criteria Emission Rates

Source No.	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

62. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 27 – PF Resin Storage Tanks Maximum Non-Criteria Emission Rates

Source No.	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

Source No.	Pollutant	lb/hr	tpy
71	Formaldehyde	0.1	0.4
	Phenol	0.1	0.4
72	Formaldehyde	0.1	0.4
	Phenol	0.1	0.4
73	Formaldehyde	0.1	0.4
	Phenol	0.1	0.4
74	Formaldehyde	0.1	0.4
	Phenol	0.1	0.4

SN-31, SN-76, SN-77, SN-78, SN-79, SN-80, and SN-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-6) 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

63. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 28 –Resi-Mix Storage Tanks Maximum Criteria Emission Rates

Source No.	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

64. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 29 –Resi-Mix Storage Tanks Maximum Non-Criteria Emission Rates

Source No.	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-85, SN-86, SN-87, SN-88, SN-90, SN-91, SN-92, SN-93 and SN-94

UF Resin Storage Tanks

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

65. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 30 –UF Resin Storage Tanks Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
85	VOC	0.2	0.9
86	VOC	0.2	0.9
87	VOC	0.2	0.9
88	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
94	VOC	0.2	0.9

66. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 31 –UF Resin Storage Tanks Maximum Non-Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
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
90	Formaldehyde	0.1	0.4

Source No.	Pollutant	lb/hr	tpy
	Phenol	0.1	0.4
91	Formaldehyde	0.1	0.4
	Phenol	0.1	0.4
92	Formaldehyde	0.1	0.4
	Phenol	0.1	0.4
93	Formaldehyde	0.1	0.4
	Phenol	0.1	0.4
94	Formaldehyde	0.1	0.4
	Phenol	0.1	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 C-6 (urea-formaldehyde concentrate), and F1-F5 (formaldehyde) being fed into kettles.

W-3 was replaced by flow meters in a modification to permit 1177-AOP-R1. W-3 will be used as a back up.

Specific Conditions

67. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 32 – Weigh Tank Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	0.1	0.4

68. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #28. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 33 – Weigh Tank Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
Total HAPs	0.10	0.25

SN-21, SN-22, SN-23, SN-97, SN-98, SN-99, SN-100, SN-101, and SN-102

Wet Strength and Dry Strength Resin Storage Tanks

Source Description

The Wet Strength Resin Storage Tanks, WS-1 through WS-8 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

69. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 34 – Wet/Dry Strength Resin Storage Tanks Maximum Criteria Emission Rates

Source No.	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
100	VOC	0.1	0.4
101	VOC	0.1	0.4
102	VOC	0.1	0.4

SN-103 and SN-124

Novacote Resin Storage Tanks

Source Description

The Novacote Resin Storage Tanks 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

70. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 35 – Novacote Resin Storage Tanks Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
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

71. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 36 – Formic Acid Storage Tank Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	0.1	0.5

72. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 37 – Formic Acid Storage Tank Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
Formic Acid	0.1	0.44

SN-132 and SN-133

Wet Strength Resin Loading Racks

Source Description

WSLOAD1(SN-132) and WSLOAD2(SN-133) are loading racks exclusively used to load wet strength resins.

Specific Conditions

73. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 38 – Novacote Resin Storage Tanks Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
132	VOC	0.1	0.2
133	VOC	0.1	0.2

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

74. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #77 and Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 39 – Spray Dry Resin Process Maximum Criteria Emission Rates

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

75. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #77 and Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 40 – Spray Dry Resin Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	22.2	97.2
Formaldehyde	7.2	31.50
Phenol	2.3	10.10
Methanol	5.3	23.20

76. 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 #15. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

77. The permittee shall test the Spray Dry Resin Process and Process Heater, SN-03, for emissions of PM_{10} and VOC to demonstrate 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. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]

SN-104 and SN-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

78. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 41– Base Liquid Resin Storage Tanks Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
104	VOC	0.1	0.4
105	VOC	0.1	0.4

79. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 42 – Base Liquid Storage Tanks Maximum Non-Criteria Emission Rates

Source No.	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

80. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 43 – ICI Process Oxidizer Maximum Criteria Emission Rates

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

81. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 44 – ICI Process Oxidizer Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.2	0.9
Formaldehyde	0.40	1.80
Methanol	1.30	5.90

82. 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 combusting natural gas. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

83. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart G, §63.113(a)2]

84. The permittee shall maintain a fire box temperature of 1600 °F 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart G, §63.114(e)]

85. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart G, §63.118(a)1]

86. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart G, §63.152(a)]

87. The permittee shall submit Periodic Reports as outlined in §63.152. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart G]

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

88. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 45 – TOFRAC Hot Oil Heater Maximum Criteria Emission Rates

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

89. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 46 – TOFRAC Hot Oil Heater Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.6	2.6

90. 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 combusting natural gas. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

91. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 47 – Crude Tall Oil Storage Tanks Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
16	VOC	0.1	0.4
20	VOC	0.1	0.4
40	VOC	0.1	0.4

SN-32, SN-43, and SN-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

92. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 48 – Pitch Storage Tanks Maximum Criteria Emission Rates

Source No.	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

93. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 49 – Heads 1 Storage Tanks Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	0.1	0.4

SN-33, SN-34, SN-45, and SN-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. This product is shipped off site by tank truck and rail car or is sent on for further processing in the tall oil fractionation plant.

Specific Conditions

94. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 50 – Heads 2 Storage Tanks Maximum Criteria Emission Rates

Source No.	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, SN-15, SN-46, SN-48, SN-49, SN-57, and SN-58

Tall Oil Fatty Acid Storage Tanks

Source Description

The Tall Oil Fatty Acid Storage Tanks, tank numbers T-17, 18, 22, 43, 44, 46, and 48 store product from the fatty acid distillation column. The tall oil fatty acid is shipped off site by rail car.

Specific Conditions

95. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 51 – Tall Oil Fatty Acid Storage Tanks Maximum Criteria Emission Rates

Source No.	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
57	VOC	0.1	0.4
58	VOC	0.1	0.4

SN-24, SN-35, SN-52, SN-53, SN-54, SN-55, and SN-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

96. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 52 – Tall Oil Rosin Storage Tanks Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
24	VOC	0.3	1.3
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 SN-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

97. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 53 – 502 Bottoms Storage Tanks Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
36	VOC	0.1	0.4
50	VOC	0.1	0.4

SN-42 and SN-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

98. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 54 – Distilled Tall Oil Storage Tanks Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
42	VOC	0.3	0.9
51	VOC	0.1	0.4

SN-107, SN-108, SN-109 and SN-110

Tall Oil Blend Tank

Source Description

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

Specific Conditions

99. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 55 – Tall Oil Blend Tanks Maximum Criteria Emission Rates

Source No.	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

100. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 56 – Rosin Drumming Storage Tank Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	0.1	0.4

Tall Oil Acidulation Plant

SN-12

Crude Tall Oil Acidulation Plant Scrubber

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

101. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #106 and Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 57 – Tall Oil Acidulation Plant Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.7	3.1
SO_2	1.9	8.3
VOC	5.0*	6.6

* Batch Average Value

102. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #106 and Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 58 – Tall Oil Acidulation Plant Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.7	3.1
H_2S	0.30	1.30
H_2SO_4	0.10	0.40
Methanol	0.20	0.90

103. 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. [Regulation No. 19 §19.503 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

104. 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. [Regulation No. 19 §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]

105. 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. [Regulation No. 19 §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]

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

106. 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. [Regulation No. 19 §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]

107. 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. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

108. The permittee shall only operate the CTO cooker associated with (SN-12) up to a total of 2,640 hours per year. Compliance with this condition shall be demonstrated through compliance with Specific Condition #109. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31, and 40 CFR 70.6]

109. 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 Provision #7. [Regulation No. 19 §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]

SN-111 and SN-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

110. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 59 – Wet Tall Oil Storage Tanks Maximum Criteria Emission Rates

Source No.	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 Tank, tank number T- 63, stores 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

111. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 60 – Neutral Rosin Adduct Storage Tank Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
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

112. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 61 – Rosin Size Disperser Vessel Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	0.8	3.5

SN-28 and SN-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

113. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 62 – Dispersed Size Release Tanks Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
28	VOC	0.1	0.4
116	VOC	0.1	0.4

SN-26, SN-117, SN-118 and SN-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

114. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 63 – Dispersed Size Product Storage Tanks Maximum Criteria Emission Rates

Source No.	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 SN-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

115. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 64 – Novaflo 50 Storage Tanks Maximum Criteria Emission Rates

Source No.	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

116. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 65 – 70% DUF Storage Tank Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	0.1	0.4

SN-41

Dipro Rosin Storage Tank

Source Description

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

Specific Conditions

117. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 66 – Dipro Rosin Storage Tank Maximum Criteria Emission Rates

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

118. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 67 – Derivatives Plant Baghouse Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	0.4	1.8

119. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 68 – Derivatives Plant Baghouse Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.4	1.8

120. 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 #15. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

121. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 69 – Derivatives Plant Hot Oil Heater Maximum Criteria Emission Rates

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

122. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 70 – Derivatives Plant Hot Oil Heater Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.1	0.4

123. 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 combusting natural gas. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

124. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 71 – Flaker Bagging Station Maximum Criteria Emission Rates

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

125. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 72 – Flaker Bagging Station Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	0.7	3.1
Maliec Anhydride	7.40	2.50

126. 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 #15. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

127. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Plantwide Condition #13. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 73 – Hot Melt Holding Tank Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	1.1	4.6

SN-134

SCRUB-2B Waste Water Processing

Source Description

In addition to controlling the waste gases from production of Lytor, the Pitch Boiler VOC control system also processes the gases from DUF 70 production. The VOC control system consists of a packed scrubber (SCRUB-2B), followed in series by a chilled water condenser, and then the pitch boiler (SN-05). In order to reduce the amount of formaldehyde in the gas streams feed to SN-05, SCRUB-2B needs only to operate first stage of this three stage scrubber. The waste water generated from the operation of SCRUB-2B is routed to an API separator and the complex wastewater collection area.

Specific Conditions

128. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #6.b. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 74 – SCRUB-2B Waste Water Processing Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	1.1	1.0

129. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #6.b. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 75 – SCRUB-2B Waste Water Processing Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
Formaldehyde	1.02	0.95

SN-70

Nonylphenol Storage Tank

Source Description

The nonylphenol tank is located in the Rosin Derivatives Process tank farm. Nonylphenol stored in Tank 70 will be used in the production of modified Tall Oil Rosin that is manufactured in either the Size Cooker (C-1) or the Derivatives Reactor (R-1).

Specific Conditions

130. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #132. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 76 – NonylPhenol Storage Tank Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	0.1	0.2

131. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition through compliance with Specific Condition #132. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 77 – Nonylphenol Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
Nonylphenol	0.03	0.13

132. The permittee shall limit the throughput limit of 500,000 gallons at SN-70. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

133. The facility shall maintain monthly records including a 12 month rolling total which demonstrate compliance with the limits set in Specific Condition #132 and may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Section V: COMPLIANCE PLAN AND SCHEDULE

Georgia-Pacific Resins, Inc. does not currently have an enforcement action. 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.

Section VI: PLANT WIDE CONDITIONS

1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No. 19 §19.410(B) and 40 CFR Part 52, Subpart E]

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

4. The permittee must provide: [Regulation No. 19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No. 19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Title VI Provisions

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

    a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate

commerce pursuant to §82.106.

b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

8. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]

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

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

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

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

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

Permit Shield

12. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in the following table of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in the Title V application dated October 7, 1996 and minor sources applications dated November 9, 1998, April 14, 1999, July 20, 1999, December 9, 1999, December 13, 1999, February 2, 2000, and April 7, 2000.

Table 78 - Applicable Regulations

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
Facility	Arkansas Regulation 19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation 26	Regulations of the Arkansas Operating Air Permit Program
Facility	A.C.A §8-3-103	Hydrogen Sulfide Emissions

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated November 1, 1996, as amended on January 29,1998 and February 1, 1999.

Table 79 - Inapplicable Regulations

Source No.	Regulation	Description
SN-05 Pitch Boiler	40 CFR Part 60 Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Formaldehyde production facility	40 CFR Part 60 Subpart VV	Standards of Performance for Equipment Leaks in the Synthetic Organic Chemical Manufacturing Industry
Facility	40 CFR Part 60 Subpart DDD	Standards of Performance for Volatile Organic Compound Emissions from the Polymer Manufacturing Industry
Formaldehyde production facility	40 CFR Part 60 Subpart III	Standards of Performance for Volatile Organic Compound Emissions from the Synthetic Organic Chemical Manufacturing Industry Air Oxidation

Source No.	Regulation	Description
		Process Unit Processes
Formaldehyde production facility	40 CFR Part 60 Subpart NNN	Standards of Performance for Volatile Organic Compound Emissions from the Synthetic Organic Chemical Manufacturing Industry Distillation Operations
Formaldehyde production facility	40 CFR Part 60 Subpart RRR	Standards of Performance for Volatile Organic Compound Emissions from the Synthetic Organic Chemical Manufacturing Industry Reactor Processes

13. 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 Conditions #14 and #31. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

Table 80 –Annual Production Limits by Plant

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
	100 Batches of Lytor 105k

14. 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 #13 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. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52 Subpart E]

15. The permittee shall conduct weekly observations of the opacity from the sources in the following table and keep a record of these observations. [Regulation No. 19 §19.702 and 40 CFR 52, Subpart E]

Table 81 –Baghouse Equipment Identification

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

Source Number	Equipment ID Number
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.

17. 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. [Regulation No. 19 §19.304 and 40 CFR Part 60 Subpart Kb]

Table 82 –Subpart Kb Tank Equipment Identification

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

Source Number	Equipment ID	Source Number	Equipment ID
85	U-4	122	T-14
88	U-7	123	T-51
90	U-9	124	NC-3
91	U-10	125	Formic
92	U-11	40	T-40
70	T-70	--	--

18. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart G]

Table 83 –RCI controlled storage Vessels

Tank ID Number	Description
M-2	Methanol Storage Tank
F-1	Formaldehyde Storage Tank
F-2	Formaldehyde Storage Tank
F-3	Formaldehyde Storage Tank
F-4	Formaldehyde Storage Tank
F-5	Formaldehyde Storage Tank

19. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart H]

20. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart H]

21. Compliance with the reporting requirements for the leak detection and repair requirements of 40 CFR Part 63, Subpart H shall be demonstrated through compliance with Specific Condition #21.

22. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart W]

23. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart W]

24. 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.

25. 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. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart W]

26. The permittee shall not produce more than 13,000,000 lbs of PRR in any rolling twelve (12) month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

27. The facility shall maintain monthly records including a 12 month rolling total which demonstrate compliance with the limits set in Plantwide Condition #26 and may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

28. The permittee shall emit less than 0.25 tons of any single HAP or any combination of HAPs from SN-95 in any consecutive twelve month period. The purpose of this condition is to avoid the provisions of 40 CFR Part 63, §63.1407. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

29. The facility shall maintain monthly records including a 12 month rolling total which demonstrate compliance with the limits set in Plantwide Condition #28 and may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

30. The permittee is subject to and shall comply with the requirements of the Risk Management Plan if permittee's facility is required pursuant to Section 112(r). [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

31. The permittee shall not produce more than two batches of Lytor 105k in any consecutive 24 hour period. Furthermore, the permittee shall not begin the startup of any batch unless either SN-05 or SN-129 is operating. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

32. The permittee shall maintain records of each batch of Lytor 105k produced. These records shall include date, time of batch startup, time of previous batch startup, size of batch, and the number of batches produced in the previous eleven months. These records shall be updated on

a per batch basis, kept on site, be made available to Department personnel upon request, and shall be submitted to the Air Division in accordance with General Provision #7. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Section VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated October 7, 1996, July 18,2000, and April 28, 2003.

Table 84 - Insignificant Activities

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 Tank 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	M-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
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

Description	Equipment ID	Category
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
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 / H_2SO_4 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 Plant		
Caustic Cleaning Vats-Maintenance Dept.	CV-1	B-14
Caustic Cleaning Vats-Maintenance Dept.	CV-1	B-14
Diesel Fuel Storage Tanks 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
Truck Washing	TW-1	B-14
Rosin Drumming Melter	N/A	A-13
KEEC Tank	KEEC2	A-13

Description	Equipment ID	Category
Dowtherm Storage Tank	M-18	A-3
Cashew Nut Oil Storage Tank	M-6	A-13
Urea Solution Storage Tank	US-1	A-13
Wet Strength Resin and Urea Solution Dilute Tank	WSR Dilute	A-13
Phenol Distillate Storage Tank	PD-1	A-13
Rosin Fuel Blending	N/A	A-13
Heated CTO/Brine Solution Transfer Tank	N/A	A-13

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

Section VIII:GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.[40 CFR 70.6(b)(2)]

2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]

3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation No. 26 §26.406]

4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]

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

6. The permittee must retain the records of all required monitoring data and support information for 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. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]

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

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

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. The permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:

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

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

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this

Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5) and §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]

10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]

11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]

12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]

13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]

14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]

16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]

17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]

18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally

unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]

19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]

20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]
    a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
    d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]
    a. The identification of each term or condition of the permit that is the basis of the certification;
    b. The compliance status;
    c. Whether compliance was continuous or intermittent;
    d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
    e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

22. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]
    a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
    b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
    c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,
    d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

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

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D