

ADEQ OPERATING AIR PERMIT

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

Permit No. : 1355-AOP-R0

IS ISSUED TO:
Anthony Timberlands, Inc.
Highway 51 South
Beirne, AR 71721
Clark County
AFIN: 10-00070

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:

AND

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

Signed:

Michael Bonds
Chief, Air Division

Date

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
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	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Anthony Timberlands, Inc.

AFIN: 10-00070

PERMIT NUMBER: 1355-AOP-R0

FACILITY ADDRESS: Highway 51 South
Beirne, AR 71721

MAILING ADDRESS P.O. Box 128
Beirne, AR 71721

COUNTY: Clark

CONTACT POSITION: Steven M. Anthony, Esq., Vice President - Legal Affairs

TELEPHONE NUMBER: (870) 687-2246

REVIEWING ENGINEER: Ann Sudmeyer

UTM North South (Y): Zone 15: 3749.77

UTM East West (X): Zone 15: 480.94

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SECTION II: INTRODUCTION

Summary of Permit Activity

Anthony Timberlands, Inc. operates a hardwood sawmill in Clark County near Beirne, Arkansas, approximately five miles southwest of Gurdon on Highway 51 South. This permitting action is necessary to:

1. Install three new steam-heated kilns (SN-09);
2. Increase the permitted lumber capacity from 40 to 55 million board feet per year;
3. Increase the chemical dip usage limit from 3,625 gal/yr to 7,500 gal/yr;
4. Correct the hourly emission rate for the Hardwood Predryer (SN-08);
5. Correct the hourly emission rate for the Log Processing Rechipper (SN-06);
6. Increase the VOC and HAP content limits for Chemical A used at SN-12; and
7. Add condensable particulate matter to the permitted particulate emission rates at SN-13A, SN-13B, and SN-13C.

The permitted hazardous air pollutant (HAP) emission rates will exceed the threshold of 10 tons per year of any single HAP and 25 tons per year of any combination of HAPs due to this modification; therefore, a Title V permit is required.

The total permitted emission rate increases due to this modification as compared to Phase Two of the last modification include: 7.4 tons per year (tpy) PM, 4.3 tpy PM₁₀, 24.5 tpy VOC, 0.03 tpy acrolein, 0.03 tpy benzene, 16.5 tpy diethylene glycol monomethyl ether, 0.03 tpy manganese, and 0.40 tpy methanol.

Process Description

Logs are transported by truck from the forest to the Beirne hardwood sawmill facility. Rubber-tired mobile equipment unload the logs which are transferred to one of the following areas: the infeed system for immediate processing, dry storage for near future processing, or the wet storage area for long term future demands.

The wet storage system is self contained consisting of a storage area, a water storage pond, and a water recirculation system. Pumps are used to spray water from the pond onto the logs in the storage area. The runoff from the spraying operations is gravity fed back into the storage pond for reuse.

Infeed systems convey the logs one at a time to the debarkers (SN-14) where bark is removed. The bark is collected in hoppers, mixed with sawdust, and conveyed by a chain conveyor to the bark/sawdust storage area (SN-15). The mixture of bark and sawdust is then sold or will be used as fuel. Two chippers are used in association with the log processing operations. One of the chippers discharges into the truck loading storage bin. Chips that are too large are routed to the rechipper for further processing. The chips exit the rechipper and are pneumatically conveyed through a cyclone (SN-06) to a chip bin (SN-11). The chips are loaded onto trucks from this bin.

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Sawmill operations convert logs into rough boards which are edged, trimmed, and prepared for drying. Wood waste from the trimming operations is chipped for use in paper mills. The wood waste is collected by chutes and hoppers and conveyed to the chippers for size reduction. The chippers use a blower type discharge to the sawmill chipper cyclone (SN-01) and the quad chipper cyclone (SN-07). Chain conveyors transfer the remaining chips to a truck loading bin (SN-11).

Green lumber is submerged in a 7,900 gallon dip vat (SN-12) to prevent decaying and staining of the lumber and to remove any insects that may still be residing in the lumber. Only certain lumber is dipped in this tank. This existing unit is a source of volatile organic compounds and hazardous air pollutant emissions.

Lumber drying is accomplished using a predryer (SN-08) and fourteen steam-heated kilns (SN-09). The predryer has a capacity of 1.75 million board feet of hardwood with a typical drying cycle of 30 days. During each cycle, the moisture content of the lumber is reduced from 50% to near 25%. The kilns have a standard cycle of 10 days. During each cycle, air dried or pre-dried lumber is heated to reduce the moisture content from 25% to 6-8%. Seven of the kilns have an individual capacity of 102,000 board feet, four have an individual capacity of 100,000 board feet, and three have an individual capacity of 110,000 board feet. The steam from the kilns is supplied by three 300 HP wood-fired boilers (SN-13A, SN-13B, and SN-13C). The particulate matter emissions from the boilers are controlled by multicyclones.

The dried (cooled) lumber is routed to the finishing operation where it is trimmed and planed, graded, and sorted into packages for shipping. Wood shavings generated during the finishing operations are collected by vacuum hoods and routed by blowers to cyclones (SN-02 and SN-03) at a truck bin. The shavings are loaded onto trucks through a Peerless bin (SN-10). The collected materials are sold for use in particle board manufacturing.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective February 15, 1999
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
40 CFR Part 64 – Compliance Assurance Monitoring
40 CFR Part 60, Subpart Dc - <i>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units</i>

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Regulations
40 CFR Part 63, Subpart DDDD – <i>National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products</i>
40 CFR Part 63, Subpart DDDDD – <i>National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters</i>

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

Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	32.0	91.6
		PM ₁₀	14.4	53.1
		SO ₂	0.9	3.9
		VOC	17.7	60.3
		CO	18.6	81.6
		NO _x	6.9	30.3
		Lead ¹	0.03	0.03
HAPs		Acrolein ¹	0.15	0.57
		Arsenic ¹	0.03	0.03
		Benzene ¹	0.15	0.60
		Chlorine	0.03	0.12
		Chromium (hexavalent) ¹	0.03	0.03
		DEGMME ^{1,2}	6.00	26.30
		Formaldehyde ¹	0.15	0.60
		Hydrogen Chloride	0.60	2.58
		Manganese ¹	0.06	0.24
		Methanol ¹	0.20	0.80
		Styrene ¹	0.06	0.27
SN-01	Sawmill Chipper (controlled by a cyclone)	PM	5.9	12.0
		PM ₁₀	0.6	1.2
SN-02	Planer Shavings	PM	1.5	3.0
		PM ₁₀	0.2	0.3

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
SN-03	Planer Shavings	PM	1.5	3.0
		PM ₁₀	0.2	0.3
SN-04	Boiler #2 (10.05 MMBtu/hr)	Source Removed From Service		
SN-05	Boiler #1 (2.95 MMBtu/hr)	Source Removed From Service		
SN-06	Log Processing Rechipper	PM	3.0	6.2
		PM ₁₀	0.3	0.7
SN-07	Quad Chipper	PM	3.0	6.2
		PM ₁₀	0.3	0.7
SN-08	Pre-Dryer	VOC	0.6	2.7
SN-09	Dry Kilns (14 – Steam Heated)	VOC	9.6	24.9
SN-10	Peerless Bin	PM	1.5	3.0
		PM ₁₀	0.8	1.5
SN-11	Chip Bin	PM	2.1	4.9
		PM ₁₀	0.3	0.5
SN-12	Chemical Dip Vat (7,900 Gallons)	VOC	6.9	30.0
		DEGMME ²	6.0	26.3
		Methanol	0.2	0.8
SN-13A	Wood Fired Boiler (300 HP)	PM	3.8	16.7
		PM ₁₀	3.5	15.4
		SO ₂	0.3	1.3
		VOC	0.2	0.9
		CO	6.2	27.2
		NO _x	2.3	10.1
		Lead	0.01	0.01
		Acrolein	0.05	0.19
		Arsenic	0.01	0.01
		Benzene	0.05	0.20
		Chlorine	0.01	0.04
		Chromium (hexavalent)	0.01	0.01
		Formaldehyde	0.05	0.20
		Hydrogen Chloride	0.20	0.86
Manganese	0.02	0.08		
Styrene	0.02	0.09		
SN-13B	Wood Fired Boiler (300 HP)	PM	3.8	16.7
		PM ₁₀	3.5	15.4
		SO ₂	0.3	1.3

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		VOC	0.2	0.9
		CO	6.2	27.2
		NO _x	2.3	10.1
		Lead	0.01	0.01
		Acrolein	0.05	0.19
		Arsenic	0.01	0.01
		Benzene	0.05	0.20
		Chlorine	0.01	0.04
		Chromium (hexavalent)	0.01	0.01
		Formaldehyde	0.05	0.20
		Hydrogen Chloride	0.20	0.86
		Manganese	0.02	0.08
		Styrene	0.02	0.09
SN-13C	Wood Fired Boiler (300 HP)	PM	3.8	16.7
		PM ₁₀	3.5	15.4
		SO ₂	0.3	1.3
		VOC	0.2	0.9
		CO	6.2	27.2
		NO _x	2.3	10.1
		Lead	0.01	0.01
		Acrolein	0.05	0.19
		Arsenic	0.01	0.01
		Benzene	0.05	0.20
		Chlorine	0.01	0.04
		Chromium (hexavalent)	0.01	0.01
		Formaldehyde	0.05	0.20
		Hydrogen Chloride	0.20	0.86
Manganese	0.02	0.08		
Styrene	0.02	0.09		
SN-14	Debarking Operations	PM	1.9	2.9
		PM ₁₀	1.1	1.6
SN-15	Bark/Sawdust Storage Area	PM	0.2	0.3
		PM ₁₀	0.1	0.1

1. HAPs included in the VOC or PM totals. Other HAPs are not included in any other totals unless specifically stated.

2. DEGMME = Diethylene glycol monomethyl ether

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SECTION III: PERMIT HISTORY

Permit # 1355-A was issued on September 22, 1992. It was the initial permit for the existing facility. It allowed emissions of 9.2 tpy PM, 0.031 tpy SO₂, 6.81 tpy NO_x, 1.65 tpy CO, and 0.33 tpy VOC.

Permit # 1355-AR-1 was issued on January 30, 1996. This modification involved replacing a bottom discharge chipper with a top discharge unit and the accompanying cyclone. Emission limits in this permit were: 12.0 tpy PM/PM₁₀, 0.2 tpy SO₂, 10.2 tpy VOC, 1.8 tpy CO, and 7.5 tpy NO_x.

Permit #1355-AR-2 was issued on June 8, 1999. This modification involved adding four kilns with individual capacities of 100,000 board feet and the permitting of the chemical dip tank (SN-12). The addition of the four new kilns added 14.6 million board feet per year to the total processing capacity of the facility. Emission limits in this permit were: 25.5 tpy of PM, 6.1 tpy of PM₁₀, 0.3 tpy of SO₂, 39.6 tpy of VOC, 2.7 tpy of CO, 18.0 of NO_x, 0.2 tpy of methanol, and 9.6 tpy of diethylene glycol monomethyl ether (DEGMME).

Permit #1355-AR-3 was issued on February 18, 2004. This modification allowed for the replacement of 8 kilns with individual capacities of 70,000 board feet with 7 new track kilns with individual capacities of 102,000 board feet. This increased the total capacity of lumber to be dried at the facility to 40,000,000 board feet per year. This modification also allowed for the replacement of two Scotch Marine-type boilers (SN-04 and SN-05) with three 300 HP wood-fired boilers (SN-13A, SN-13B, and SN-13C). These projects were completed in two phases. For Phase One, the total permitted emission rates increased by 59.7 tons per year (tpy) PM, 43.7 tpy PM₁₀, 3.9 tpy SO₂, 84.5 tpy CO, 21.6 tpy NO_x, 0.20 tpy methanol, 0.20 tpy DEGMME (Diethylene glycol monomethyl ether), 0.54 tpy acrolein, 0.57 tpy benzene, 0.12 tpy chlorine, 0.60 tpy formaldehyde, 2.58 tpy hydrogen chloride, 0.27 tpy styrene, 0.21 tpy manganese, and 0.03 tpy arsenic, 0.03 tpy chromium (hexavalent), and 0.03 tpy lead. For Phase Two, the total permitted emission rates increased from Permit #1355-AR-2 by 58.7 tpy PM, 42.7 tpy PM₁₀, 3.6 tpy SO₂, 78.9 tpy CO, 12.3 tpy NO_x, 0.20 tpy methanol, 0.20 tpy DEGMME, 0.54 tpy acrolein, 0.57 tpy benzene, 0.12 tpy chlorine, 0.60 tpy formaldehyde, 2.58 tpy hydrogen chloride, 0.27 tpy styrene, 0.21 manganese, and 0.03 tpy arsenic, 0.03 tpy chromium (hexavalent), and 0.03 tpy lead.

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SECTION IV: SPECIFIC CONDITIONS

SN-01

Sawmill Chipper (controlled by a cyclone)

Source Description

Sawmill operations transform logs into rough boards which are edged, trimmed, and prepared for drying. Woodwaste from the trimming operations is then chipped for use in paper mills. The woodwaste is gathered through the use of chutes and hoppers and conveyed to the chippers for size reduction. The chippers employ a blower-type discharge to the sawmill chipper discharge cyclone (SN-01) and the quad chipper cyclone (SN-07). These control devices are 99.99% efficient in capturing particulate matter.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 19, §19.501 et seq., effective February 15, 1999 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.6	1.2

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	5.9	12.0

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Regulation 19, §19.503 and 40 CFR Part 52, Subpart E]

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

4. The permittee shall conduct weekly observations of the opacity from source SN-01 and keep a record of these observations. If the permittee detects visible emissions in excess of 20%, the permittee must immediately take action to identify and correct the cause of

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the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

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**SN-02 and SN-03
Planer Shavings (controlled by two cyclones)**

Source Description

Dried lumber from the kilns is routed to the finishing operation where it is trimmed and planed, graded and sorted into packages for shipping. Wood shavings generated during finishing operations are collected by vacuum hoods and routed by blowers to cyclones (SN-02 and SN-03) at a truck bin. These pollution control devices are 99.9% efficient in collecting particulate matter.

Specific Conditions

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Source	Pollutant	lb/hr	tpy
SN-02	PM ₁₀	0.2	0.3
SN-03	PM ₁₀	0.2	0.3

6. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Source	Pollutant	lb/hr	tpy
SN-02	PM	1.5	3.0
SN-03	PM	1.5	3.0

7. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Regulation 19, §19.503 and 40 CFR Part 52, Subpart E]

Source	Limit	Regulatory Citation
SN-02	20%	§19.503 and 40 CFR Part 52, Subpart E
SN-03	20%	§19.503 and 40 CFR Part 52, Subpart E

8. The permittee shall conduct weekly observations of the opacity from sources SN-02 and SN-03 and keep a record of these observations. If the permittee detects visible emissions

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in excess of 20%, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

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SN-06

Log Processing Rechipper (controlled by a cyclone)

Source Description

Two chippers are used in association with the log processing operations. One of the chippers discharges to the truck loading storage bin with out-of-specification chips being routed to the rechipper for future processing. The green chips exit the rechipper and are pneumatically conveyed through a cyclone to a truck bin. The capture efficiency of this pollution control device is 99.99%.

Specific Conditions

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.3	0.7

10. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	3.0	6.2

11. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Regulation 19, §19.503 and 40 CFR Part 52, Subpart E]

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

12. The permittee shall conduct weekly observations of the opacity from source SN-06 and keep a record of these observations. If the permittee detects visible emissions in excess of 20%, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to

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Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

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SN-07

Quad Chipper (controlled by a cyclone)

Source Description

Sawmill operations transform logs into rough boards which are edged, trimmed, and prepared for drying. Woodwaste from the trimming operations is then chipped for use in paper mills. The woodwaste is gathered through the use of chutes and hoppers and conveyed to the chippers for size reduction. The chippers employ a blower-type discharge to the sawmill chipper discharge cyclone (SN-01) and the quad chipper cyclone (SN-07). These control devices are 99.99% efficient in capturing particulate matter.

Specific Conditions

13. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.3	0.7

14. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	3.0	6.2

15. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Regulation 19, §19.503 and 40 CFR Part 52, Subpart E]

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

16. The permittee shall conduct weekly observations of the opacity from source SN-07 and keep a record of these observations. If the permittee detects visible emissions in excess of 20%, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective

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action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

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**SN-08
Hardwood Pre-dryer**

Source Description

The drying of hard lumber is accomplished through the use of a pre-dryer (SN-08) and kilns (SN-09). The pre-dryer has a capacity of 1.75 million board feet of hardwood with a typical drying cycle of 30 days. During each drying cycle, the moisture content of the lumber is reduced from 50% to near 25%. The pre-dryer is steam-heated.

Specific Conditions

17. The permittee shall not exceed the emission rates set forth in the following table. These emission rate limits are based on the maximum capacity of the equipment. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	0.6	2.7

18. The permittee shall meet all applicable requirements of 40 CFR Part 63, Subpart DDDD – *National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*. These requirements include, but are not limited to the following: [Regulation 19, §19.304 and 40 CFR Part 63, Subpart DDDD]
- a. The permittee must always operate and maintain the affected source according to the provisions in 40 CFR §63.6(e)(1)(i). [40 CFR §63.2250(b)]
 - b. The permittee must submit an Initial Notification no later than 120 calendar days after September 28, 2004, or after initial startup, whichever is later, as specified in 40 CFR §63.9(b)(2). [40 CFR §63.2280(b)]

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**SN-09
Dry Kilns (14)**

Source Description

Lumber drying is accomplished through the use of a predryer (SN-08) and 14 steam-heated kilns (SN-09). Seven of the kilns have individual capacities of 102,000 board feet, four kilns have individual capacities of 100,000 board feet, and three kilns have individual capacities of 110,000 board feet. These kilns have a standard drying time of 10 days. During each cycle, air-dried or pre-dried lumber is heated to reduce the moisture content from 25% to 6-8%.

Specific Conditions

19. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	9.6	24.9

20. The permittee shall not process more than 55 million board feet of lumber through the fourteen drying kilns per consecutive 12-month period. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
21. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #20. The permittee will update the records 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. The twelve-month rolling total and each individual month's data shall be submitted in accordance with General Provision #7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]
22. The permittee shall meet all applicable requirements of 40 CFR Part 63, Subpart DDDD – *National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*. These requirements include, but are not limited to the following: [Regulation 19, §19.304 and 40 CFR Part 63, Subpart DDDD]
- a. The permittee must always operate and maintain the affected source according to the provisions in 40 CFR §63.6(e)(1)(i). [40 CFR §63.2250(b)]
 - b. The permittee must submit an Initial Notification no later than 120 calendar days after September 28, 2004, or after initial startup, whichever is later, as specified in 40 CFR §63.9(b)(2). [40 CFR §63.2280(b)]

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**SN-10
Peerless Bin**

Source Description

Dried (cooled) lumber is routed to the finishing operation where it is trimmed and planed, graded and sorted into packages for shipping. Wood shavings generated during finishing operations are collected by vacuum hoods and routed by blowers to cyclones (SN-02 and SN-03) at a truck bin. The shavings are loaded out onto trucks through a Peerless Bin (SN-10). The collected materials are sold for use in particle board manufacturing, or are burned in the wood-fired boilers (SN-13A, SN-13B, and SN-13C).

Specific Conditions

23. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.8	1.5

24. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	1.5	3.0

25. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Regulation 19, §19.503 and 40 CFR Part 52, Subpart E]

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

26. The permittee shall conduct weekly observations of the opacity from source SN-10 and keep a record of these observations. If the permittee detects visible emissions in excess of 20%, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective

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action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

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**SN-11
Chip Bin**

Source Description

Wood chips from the Sawmill Chipper Cyclone (SN-01), the Log Processing Rechipper (SN-06), and the Quad Chipper (SN-07) are collected in this bin and loaded out on trucks. Analyses conducted at similar sawmill facilities indicate that the loading out of wood chips generates 0.04 pounds of particulate matter per ton of material.

Specific Conditions

27. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.3	0.5

28. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	2.1	4.9

29. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Regulation 19, §19.503 and 40 CFR Part 52, Subpart E]

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

30. The permittee shall conduct weekly observations of the opacity from source SN-11 and keep a record of these observations. If the permittee detects visible emissions in excess of 20%, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to

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Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

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**SN-12
Chemical Dip Vat**

Source Description

Green lumber is submerged in either Busperse 293, Busan 1009, or a dip chemical equivalent to prevent the decaying and staining of the lumber and to remove any insects that may still be present on the lumber. The dipping chemicals are stored in a 7,900-gallon open top vat. Not all of the green lumber is dipped in this tank.

Specific Conditions

31. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #33 and #34. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	6.9	30.0

32. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #35 and #36. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Diethylene glycol monomethyl ether	6.0	26.3
Methanol	0.2	0.8

33. The permittee will not exceed the limits on the chemicals used in the chemical dip vat (SN-12) listed in the following table. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

Chemical	VOC Content (lb/gal)	HAP Content (lb/gal)		Allowable 12 Month Usage (Gallons)
		DEGMME		
Chemical A	8.0	7.0		7,500
		Methanol	0.2	
Chemical B	No VOCs Allowed	No HAPs Allowed		No Limit

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34. The permittee will maintain records to demonstrate compliance with the usage and VOC content limits in Specific Condition #33. These records will include the amount of chemical compounds for use in the dip tank received at this facility and the VOC content of these compounds as documented by the manufacturer's Material Safety Data Sheet or equivalent. These records will be kept on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. These records will be kept on site, made available to Department personnel upon request, and submitted in accordance with General Provision #7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]
35. The permittee will maintain records of the HAPs contained in the chemical compounds used at SN-12 to demonstrate compliance with the HAP content limits in Specific Condition #33. These records will include the name of the HAP, the HAP content of the chemical compound used as documented by the manufacturer's Material Safety Data sheet or equivalent, and the TLV (Threshold Limit Value, as listed in the most recent American Conference of Governmental Industrial Hygienists handbook) of the HAP. These records will be kept on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. These records will be kept on site, made available to Department personnel upon request, and submitted in accordance with General Provision #7. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
36. The permittee may use chemical compounds containing HAPs other than those listed in Specific Condition #33 provided that the TLV of the substituted HAP is greater than or equal to the TLV of the HAP being substituted and the emission rates set forth in Specific Condition #32 are not exceeded. Substitutions shall be fully documented in the records required by Specific Condition #35. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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**SN-13A, SN-13B, and SN-13C
Wood-Fired Boilers (controlled by multicyclone)**

Source Description

This source consists of three 300 HP wood-fired boilers (10.334 MMBtu/hr per boiler). These boilers supply steam for the facility's dry kilns (SN-09). The boilers are controlled by multicyclones with collection efficiency greater than 95%.

Specific Conditions

37. The permittee shall not exceed the emission rates set forth in the following table. These emission rate limits are based on the maximum capacity of the equipment. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Source	Pollutant	lb/hr	tpy
SN-13A	PM ₁₀	3.5	15.4
	SO ₂	0.3	1.3
	VOC	0.2	0.9
	CO	6.2	27.2
	NO _x	2.3	10.1
	Lead	0.01	0.01
SN-13B	PM ₁₀	3.5	15.4
	SO ₂	0.3	1.3
	VOC	0.2	0.9
	CO	6.2	27.2
	NO _x	2.3	10.1
	Lead	0.01	0.01
SN-13C	PM ₁₀	3.5	15.4
	SO ₂	0.3	1.3
	VOC	0.2	0.9
	CO	6.2	27.2
	NO _x	2.3	10.1
	Lead	0.01	0.01

38. The permittee shall not exceed the emission rates set forth in the following table. These emission rate limits are based on the maximum capacity of the equipment. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Source	Pollutant	lb/hr	tpy
SN-13A	PM	3.8	16.7
	Acrolein	0.05	0.19
	Arsenic	0.01	0.01
	Benzene	0.05	0.20

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Source	Pollutant	lb/hr	tpy
	Chlorine	0.01	0.04
	Chromium (hexavalent)	0.01	0.01
	Formaldehyde	0.05	0.20
	Hydrogen Chloride	0.20	0.86
	Manganese	0.02	0.08
	Styrene	0.02	0.09
	SN-13B	PM	3.8
Acrolein		0.05	0.19
Arsenic		0.01	0.01
Benzene		0.05	0.20
Chlorine		0.01	0.04
Chromium (hexavalent)		0.01	0.01
Formaldehyde		0.05	0.20
Hydrogen Chloride		0.20	0.86
Manganese		0.02	0.08
Styrene		0.02	0.09
SN-13C	PM	3.8	16.7
	Acrolein	0.05	0.19
	Arsenic	0.01	0.01
	Benzene	0.05	0.20
	Chlorine	0.01	0.04
	Chromium (hexavalent)	0.01	0.01
	Formaldehyde	0.05	0.20
	Hydrogen Chloride	0.20	0.86
	Manganese	0.02	0.08
	Styrene	0.02	0.09

39. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Regulation 19, §19.503 and 40 CFR Part 52, Subpart E]

Source	Limit	Regulatory Citation
SN-13A	20%	§19.503 and 40 CFR Part 52, Subpart E
SN-13B	20%	§19.503 and 40 CFR Part 52, Subpart E
SN-13C	20%	§19.503 and 40 CFR Part 52, Subpart E

40. The permittee shall conduct daily observations of the opacity from sources SN-13A, SN-13B, and SN-13C and keep a record of these observations. If the permittee detects visible emissions in excess of 20%, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective

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action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E, and 40 CFR Part 64]

41. The permittee will use only wood to fuel the boilers. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
42. The permittee will perform an initial test on one of the boilers (SN-13A, SN-13B, or SN-13C) while the source is operating at or above 90% of rated capacity using EPA Reference Methods 201A and 202 for PM₁₀. This test will be performed in accordance with Plantwide Condition #3. Failure of this initial test (not any subsequent retests) will require the permittee to test all three boilers within 45 days of the failed test and it will also require the permittee to perform testing every other year on one boiler. Test results will be maintained on-site, made available to Department personnel upon request, and will be submitted to the Department in accordance with Plantwide Condition #3. The Department reserves the right to select the boiler to be tested. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]
43. The permittee will perform a one time test source of one of the boilers (SN-13A, SN-13B, or SN-13C) while the source is operating at or above 90% of rated capacity using EPA Reference Method 10 for CO. This test will be performed in accordance with Plantwide Condition #3. Test results will be maintained on-site, made available to Department personnel upon request, and will be submitted to the Department in accordance with Plantwide Condition #3. The Department reserves the right to select the boiler to be tested. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]
44. SN-13A, SN-13B, and SN-13C are subject to 40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The permittee will comply with all applicable regulations under 40 CFR Part 60, Subpart Dc. Requirements of this subpart for this facility include, but are not limited to, the following: 40 CFR 60.48c (g): records of the amount of fuel combusted for source SN-13A, SN-13B, and SN-13C; and 40 CFR 60.48c (i): maintaining these records for two years. The permittee is required to keep records of the fuel combusted each day by each of the three wood-fired boilers and to maintain those records for at least two years. These records will be updated by noon of the day following the day to which the records pertain. These records will be kept on site and made available to Department personnel upon request. [§19.304 of Regulation 19 and 40 CFR 60, Subpart Dc]
45. The permittee shall submit an application to the Department before March 12, 2006 for the incorporation of the requirements of 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. [§26.1011 of Regulation 26]

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**SN-14
Debarking Operations**

Source Description

Infeed systems convey the logs one at a time to the debarkers where bark is removed. The bark is collected in hoppers, mixed with sawdust, and conveyed by a chain conveyor to the Chip Bin (SN-11). The mixture of bark and sawdust is then sold or will be used as fuel.

Specific Conditions

46. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	1.1	1.6

47. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	1.9	2.9

48. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Regulation 19, §19.503 and 40 CFR Part 52, Subpart E]

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

49. The permittee shall conduct weekly observations of the opacity from source SN-14 and keep a record of these observations. If the permittee detects visible emissions in excess of 20%, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

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SN-15
Bark/Sawdust Storage Area

Source Description

Green bark from the Debarkers (SN-14) is collected in hoppers, mixed with sawdust, and conveyed by a chain conveyor to the Bark/Sawdust Storage Area (SN-15). The mixture of bark and sawdust is then sold or will be used as fuel.

Specific Conditions

50. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.1

51. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #20. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.2	0.3

52. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Regulation 19, §19.503 and 40 CFR Part 52, Subpart E]

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

53. The permittee shall conduct weekly observations of the opacity from source SN-15 and keep a record of these observations. If the permittee detects visible emissions in excess of 20%, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Anthony Timberlands, 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.

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SECTION VI: PLANTWIDE CONDITIONS

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

Title VI Provisions

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

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- a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
8. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC like appliance” as defined at §82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
9. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
10. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

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.

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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.

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SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §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 May 11, 2004.

Description	Category
There are no insignificant activities listed in the permit application submitted by this facility.	

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SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and

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

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

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

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

The permittee 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

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

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

[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), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]
14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director

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

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All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]

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

APPENDIX A

APPENDIX B

APPENDIX C