

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1355-AR-3

IS ISSUED TO:

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

THIS PERMIT IS Anthony Timberlands, Inc.'s AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 ET SEQ.) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Anthony G. Davis
Interim Chief, Air Division

Date

Table of Contents

Section I: FACILITY INFORMATION..... 3

Section II: INTRODUCTION 4

Summary..... 4

Process Description 4

Regulations..... 6

Section III: PERMIT HISTORY..... 8

Section IV: EMISSION UNIT INFORMATION 9

Specific Conditions..... 9

SN- 04 and SN-05 Conditions 16

SN- 09 Conditions 16

SN- 12 Conditions 17

SN-13A, SN-13B, and SN-13C Conditions..... 18

NSPS Requirements..... 19

Section V: INSIGNIFICANT ACTIVITIES 20

Section VI: GENERAL CONDITIONS 21

APPENDIX A..... 25

Anthony Timberlands, Inc.
Permit #: 1355-AR-3
AFIN: 10-00070

Section I: FACILITY INFORMATION

PERMITTEE: Anthony Timberlands, Inc.

AFIN: 10-00070

PERMIT NUMBER: 1355-AR-3

FACILITY ADDRESS: Highway 51 South
Beirne, AR 71721

COUNTY: Clark

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

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REVIEWING
ENGINEER: Karen Cerney

UTM North-South (Y): Zone 15 [3915]

UTM East-West (X): Zone 15 [370]

Section II: INTRODUCTION

Summary

Anthony Timberlands, Inc. (ATI), operates a hardwood sawmill in Clark county near Beirne, Arkansas, approximately 5 miles southwest of Gurdon on Highway 51.

This modification to Permit #1355-AR-2 allows 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 will increase the total capacity of lumber to be dried at the facility to 40,000,000 board feet. This modification also allows 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 will be completed in two phases. The first phase consists of the 8 existing kilns with individual capacities of 70,000 board feet remaining in operation; the two Scotch Marine-type boilers (SN-04 and SN-05) will continue to operate until the three 300 HP wood-fired boilers (SN-13A, SN-13B, SN-13C) are installed and operational. During the second phase, the three 300 HP wood-fired boilers will continue to operate and the two Scotch Marine-type boilers will be removed from service, and the 8 existing kilns with individual capacities of 70,000 board feet will be removed and replaced with 7 new track kilns with individual capacities of 102,000 board feet.

With this modification during Phase One, there is an increase in emissions from Permit #1355-AR-2 by 59.7 tons per year (tpy) for PM, by 43.7 tpy for PM₁₀, by 3.9 tpy for SO₂, by 84.5 tpy for CO, by 21.6 tpy for NO_x, by 0.20 tpy for methanol and DEGMME (Diethylene glycol monomethyl ether), by 0.54 tpy for acrolein, by 0.57 tpy for benzene, by 0.12 tpy for chlorine, by 0.60 tpy for formaldehyde, by 2.58 tpy for hydrogen chloride, by 0.27 tpy for styrene, by 0.21 for manganese, and by 0.03 tpy for arsenic, chromium (hexavalent), and lead.

With this modification during Phase Two, there is an increase in emissions from Permit #1355-AR-2 by 58.7 tpy for PM, by 42.7 tpy for PM₁₀, by 3.6 tpy for SO₂, by 78.9 tpy for CO, by 12.3 tpy for NO_x, by 0.20 tpy for methanol and DEGMME, by 0.54 tpy for acrolein, by 0.57 tpy for benzene, by 0.12 tpy for chlorine, by 0.60 tpy for formaldehyde, by 2.58 tpy for hydrogen chloride, by 0.27 tpy for styrene, by 0.21 for manganese, and by 0.03 tpy for arsenic, chromium (hexavalent), and lead.

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.

Anthony Timberlands, Inc.

Permit #: 1355-AR-3

AFIN: 10-00070

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). The bark is collected in hoppers, mixed with sawdust, and conveyed by 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.

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 currently accomplished using a predryer (SN-08) and twelve 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%.

Currently, twelve drying kilns (SN-09) are present in the kiln building. Eight of the kilns have an individual capacity of 70,000 board feet, and four have an individual capacity of 100,000 board feet. These 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%. The facility is currently permitted to dry up to 35,040,000 board feet during any consecutive twelve month period. The kilns are currently equipped with burners that combust natural gas to provide additional heat for the drying of the hardwood lumber. This modification allows the replacement of the eight smaller kilns with seven new track kilns with a capacity of 102,000 board feet each during phase two of the project. This results in a facility throughput capacity of 40.0 million board feet of lumber to be dried at the facility in a total of eleven kilns.

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

Anthony Timberlands, Inc.
Permit #: 1355-AR-3
AFIN: 10-00070

collected materials are sold for used in particle board manufacturing.

During the first phase of the boiler replacement project, the two Scotch Marine-type boilers (SN-04 and SN-05) will continue to generate the steam necessary for the lumber drying process while the three 300 hp wood-fired boilers (SN-13A, SN-13B, and SN-13C) are installed. Once the three wood-fired boilers are operational, the two Scotch Marine-type boilers will be removed from service.

Regulations

This facility is subject to regulation under the Arkansas Air Pollution Control Code (Regulation 18) and the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19). The three wood-fired boilers (300 hp each) are subject to 40 CFR 60, Subpart Dc.

The following table is a summary of the facility's total emissions during Phase One of the Boiler Replacement Project.

Table 1 – Phase One Total Allowable Emissions

Total Allowable Emissions		
Pollutant	Emissions Rates	
	lb/hr	tpy
PM	35.8	85.2
PM ₁₀	13.9	49.8
SO ₂	1.2	4.2
VOC	8.0	35.6
CO	20.0	87.2
NO _x	9.1	39.6
Methanol	0.10	0.40
DEGMME*	2.20	9.80
Acrolein	0.12	0.54
Benzene	0.12	0.57
Chlorine	0.03	0.12
Formaldehyde	0.15	0.60
Hydrogen Chloride	0.60	2.58
Styrene	0.06	0.27
Arsenic	0.03	0.03
Chromium (hexavalent)	0.03	0.03
Lead	0.03	0.03
Manganese	0.06	0.21
Total HAPs	3.53	15.18

* Diethylene glycol monomethyl ether

Anthony Timberlands, Inc.
 Permit #: 1355-AR-3
 AFIN: 10-00070

The following table is a summary of the facility's total emissions during Phase Two of the Boiler Replacement Project.

Table 2 – Phase Two Total Allowable Emissions

Total Allowable Emissions		
Pollutant	Emissions Rates	
	lb/hr	tpy
PM	35.5	84.2
PM ₁₀	13.6	48.8
SO ₂	0.9	3.9
VOC	9.8	35.8
CO	18.6	81.6
NO _x	6.9	30.3
Methanol	0.10	0.40
DEGMME*	2.20	9.80
Acrolein	0.12	0.54
Benzene	0.12	0.57
Chlorine	0.03	0.12
Formaldehyde	0.15	0.60
Hydrogen Chloride	0.60	2.58
Styrene	0.06	0.27
Arsenic	0.03	0.03
Chromium (hexavalent)	0.03	0.03
Lead	0.03	0.03
Manganese	0.06	0.21
Total HAPs	3.53	15.18

* Diethylene glycol monomethyl ether

Anthony Timberlands, Inc.
Permit #: 1355-AR-3
AFIN: 10-00070

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).

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee will not exceed the emission rates set forth in the following tables. [§19.501 *et seq.* of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 3 - Criteria Pollutants for Phase One

SN	Description	Pollutant	lb/hr	tpy
SN-01	Sawmill Chipper	PM ₁₀	0.6	0.9
SN-02	Planer Shavings	PM ₁₀	0.2	0.3
SN-03	Planer Shavings	PM ₁₀	0.2	0.3
SN-04	Boiler #2 (10.05 MMBtu/hr)	PM ₁₀	0.1	0.4
		SO ₂	0.1	0.1
		VOC	0.1	0.3
		CO	0.9	3.7
		NO _x	1.0	4.4
SN-05	Boiler #1 (2.95 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.3	1.1
		NO _x	0.3	1.3
SN-06	Log Processing Rechipper	PM ₁₀	0.2	0.5
SN-07	Quad Chipper	PM ₁₀	0.3	0.5
SN-08	Pre-Dryer	VOC	0.5	2.7
SN-09	Dry Kilns (12 - Gas Fired) Bubbled Emissions from 12 dryers: 8 of the kilns with individual capacities of 70,000 board feet, and 4 with individual capacities of 100,000 board feet	PM ₁₀	0.1	0.5
		SO ₂	0.1	0.1
		VOC	3.9	17.6
		CO	0.2	0.8
		NO _x	0.9	3.6
SN-10	Peerless Bin	PM ₁₀	0.8	1.1
SN-11	Chip Bin	PM ₁₀	0.2	0.4
SN-12	Chemical Dip Vat (7,900 Gallons)	VOC*	2.8	12.2

Anthony Timberlands, Inc.
 Permit #: 1355-AR-3
 AFIN: 10-00070

SN	Description	Pollutant	lb/hr	tpy
SN-13A	Wood Fired Boiler (300 HP)	PM ₁₀	3.3	14.5
		SO ₂	0.3	1.3
		VOC	0.2	0.9
		CO	6.2	27.2
		NO _x	2.3	10.1
SN-13B	Wood Fired Boiler (300 HP)	PM ₁₀	3.3	14.5
		SO ₂	0.3	1.3
		VOC	0.2	0.9
		CO	6.2	27.2
		NO _x	2.3	10.1
SN-13C	Wood Fired Boiler (300 HP)	PM ₁₀	3.3	14.5
		SO ₂	0.3	1.3
		VOC	0.2	0.9
		CO	6.2	27.2
		NO _x	2.3	10.1
SN-14	Debarking Operations	PM ₁₀	1.1	1.2
SN-15	Bark/Sawdust Storage Area	PM ₁₀	0.1	0.1

* VOC emissions include HAP emissions.

Table 4 - Criteria Pollutants for Phase Two

SN	Description	Pollutant	lb/hr	tpy
SN-01	Sawmill Chipper	PM ₁₀	0.6	0.9
SN-02	Planer Shavings	PM ₁₀	0.2	0.3
SN-03	Planer Shavings	PM ₁₀	0.2	0.3
SN-04	Boiler #2 (10.05 MMBtu/hr)	Source Removed Once Phase 1 Completed		
SN-05	Boiler #1 (2.95 MMBtu/hr)	Source Removed Once Phase 1 Completed		
SN-06	Log Processing Rechipper	PM ₁₀	0.2	0.5
SN-07	Quad Chipper	PM ₁₀	0.3	0.5
SN-08	Pre-Dryer	VOC	0.5	2.7
SN-09	Dry Kilns (11 - Steam) Bubbled Emissions for 11 dryers: 4 with individual capacities of 100,000 board feet and 7 track kilns with individual capacities of 102,000 board feet	VOC	5.9	18.2
SN-10	Peerless Bin	PM ₁₀	0.8	1.1

Anthony Timberlands, Inc.
 Permit #: 1355-AR-3
 AFIN: 10-00070

SN	Description	Pollutant	lb/hr	tpy
SN-11	Chip Bin	PM ₁₀	0.2	0.4
SN-12	Chemical Dip Vat (7,900 Gallons)	VOC*	2.8	12.2
SN-13A	Wood Fired Boiler (300 HP)	PM ₁₀	3.3	14.5
		SO ₂	0.3	1.3
		VOC	0.2	0.9
		CO	6.2	27.2
		NO _x	2.3	10.1
SN-13B	Wood Fired Boiler (300 HP)	PM ₁₀	3.3	14.5
		SO ₂	0.3	1.3
		VOC	0.2	0.9
		CO	6.2	27.2
		NO _x	2.3	10.1
SN-13C	Wood Fired Boiler (300 HP)	PM ₁₀	3.3	14.5
		SO ₂	0.3	1.3
		VOC	0.2	0.9
		CO	6.2	27.2
		NO _x	2.3	10.1
SN-14	Debarking Operations	PM ₁₀	1.1	1.2
SN-15	Bark/Sawdust Storage Area	PM ₁₀	0.1	0.1

* VOC emissions include HAP emissions.

- The permittee will not exceed the emission rates set forth in the following tables. [§18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 5 - Non-Criteria Pollutants for Phase One

SN	Description	Pollutant	lb/hr	tpy
SN-01	Sawmill Chipper	PM	5.9	8.7
SN-02	Planer Shavings	PM	1.5	2.2
SN-03	Planer Shavings	PM	1.5	2.2
SN-04	Boiler #2 (10.05 MMBtu/hr)	PM	0.1	0.4
SN-05	Boiler #1(10.05 MMBtu/hr)	PM	0.1	0.1
SN-06	Log Processing Rechipper	PM	1.3	4.5

Anthony Timberlands, Inc.
 Permit #: 1355-AR-3
 AFIN: 10-00070

SN	Description	Pollutant	lb/hr	tpy
SN-07	Quad Chipper	PM	3.0	4.5
SN-09	Dry Kilns (12 – Gas Fired) Bubbled Emissions from 12 dryers: 8 of the kilns with individual capacities of 70,000 board feet, and 4 with individual capacities of 100,000 board feet	PM	0.1	0.5
SN-10	Peerless Bin	PM	1.5	2.2
SN-11	Chip Bin	PM	2.0	3.6
SN-12	Chemical Dip Vat (7,900 Gallons)	Methanol	0.10	0.40
		DEGMME*	2.20	9.80
SN-13A	Wood Fired Boiler (300 HP)	PM	3.6	15.8
		Acrolein	0.04	0.18
		Benzene	0.04	0.19
		Chlorine	0.01	0.04
		Formaldehyde	0.05	0.20
		Hydrogen Chloride	0.20	0.86
		Styrene	0.02	0.09
		Arsenic	0.01	0.01
		Chromium (hexavalent)	0.01	0.01
		Lead	0.01	0.01
		Manganese	0.02	0.07
SN-13B	Wood Fired Boiler (300 HP)	PM	3.6	15.8
		Acrolein	0.04	0.18
		Benzene	0.04	0.19
		Chlorine	0.01	0.04
		Formaldehyde	0.05	0.20
		Hydrogen Chloride	0.20	0.86
		Styrene	0.02	0.09
		Arsenic	0.01	0.01
		Chromium (hexavalent)	0.01	0.01
		Lead	0.01	0.01

SN	Description	Pollutant	lb/hr	tpy
		Manganese	0.02	0.07
SN-13C	Wood Fired Boiler (300 HP)	PM	3.6	15.8
		Acrolein	0.04	0.18
		Benzene	0.04	0.19
		Chlorine	0.01	0.04
		Formaldehyde	0.05	0.20
		Hydrogen Chloride	0.20	0.86
		Styrene	0.02	0.09
		Arsenic	0.01	0.01
		Chromium (hexavalent)	0.01	0.01
		Lead	0.01	0.01
		Manganese	0.02	0.07
SN-14	Debarking Operations	PM	1.9	2.1
SN-15	Bark/Sawdust Storage Area	PM	6.1	6.8

* Diethylene glycol monomethyl ether

Table 6 - Non-Criteria Pollutants for Phase Two

SN	Description	Pollutant	lb/hr	tpy
SN-01	Sawmill Chipper	PM	5.9	8.7
SN-02	Planer Shavings	PM	1.5	2.2
SN-03	Planer Shavings	PM	1.5	2.2
SN-04	Boiler #2 (10.05 MMBtu/hr)	Source Removed Once Phase 1 Completed		
SN-05	Boiler #1 (10.05 MMBtu/hr)	Source Removed Once Phase 1 Completed		
SN-06	Log Processing Rechipper	PM	1.3	4.5
SN-07	Quad Chipper	PM	3.0	4.5
SN-10	Peerless Bin	PM	1.5	2.2
SN-11	Chip Bin	PM	2.0	3.6
SN-12	Chemical Dip Vat (7,900 Gallons)	Methanol	0.10	0.40
		DEGMME*	2.20	9.80
SN-13A	Wood Fired Boiler (300 HP)	PM	3.6	15.8
		Acrolein	0.04	0.18
		Benzene	0.04	0.19

Anthony Timberlands, Inc.
 Permit #: 1355-AR-3
 AFIN: 10-00070

SN	Description	Pollutant	lb/hr	tpy
		Chlorine	0.01	0.04
		Formaldehyde	0.05	0.20
		Hydrogen Chloride	0.20	0.86
		Styrene	0.02	0.09
		Arsenic	0.01	0.01
		Chromium (hexavalent)	0.01	0.01
		Lead	0.01	0.01
		Manganese	0.02	0.07
SN-13B	Wood Fired Boiler (300 HP)	PM	3.6	15.8
		Acrolein	0.04	0.18
		Benzene	0.04	0.19
		Chlorine	0.01	0.04
		Formaldehyde	0.05	0.20
		Hydrogen Chloride	0.20	0.86
		Styrene	0.02	0.09
		Arsenic	0.01	0.01
		Chromium (hexavalent)	0.01	0.01
		Lead	0.01	0.01
		Manganese	0.02	0.07
SN-13C	Wood Fired Boiler (300 HP)	PM	3.6	15.8
		Acrolein	0.04	0.18
		Benzene	0.04	0.19
		Chlorine	0.01	0.04
		Formaldehyde	0.05	0.20
		Hydrogen Chloride	0.20	0.86
		Styrene	0.02	0.09
		Arsenic	0.01	0.01
		Chromium (hexavalent)	0.01	0.01
		Lead	0.01	0.01
		Manganese	0.02	0.07
SN-14	Debarking Operations	PM	1.9	2.1
SN-15	Bark/Sawdust Storage Area	PM	6.1	6.8

* Diethylene glycol monomethyl ether

3. Visible emissions will not exceed the limits specified in the following tables of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 7 - Visible Emissions for Phase One

SN	Limit	Regulatory Citation
SN-01	20%	§19.503
SN-02	20%	§19.503
SN-03	20%	§19.503
SN-04	5%	§18.501
SN-05	5%	§18.501
SN-06	20%	§19.503
SN-07	20%	§19.503
SN-09	5%	§18.501
SN-10	20%	§19.503
SN-11	20%	§19.503
SN-13A	20%	§19.503
SN-13B	20%	§19.503
SN-13C	20%	§19.503
SN-14	20%	§19.503
SN-15	20%	§19.503

Table 8 - Visible Emissions for Phase Two

SN	Limit	Regulatory Citation
SN-01	20%	§19.503
SN-02	20%	§19.503
SN-03	20%	§19.503
SN-04		Source Removed Once Phase 1 Completed
SN-05		Source Removed Once Phase 1 Completed
SN-06	20%	§19.503
SN-07	20%	§19.503
SN-10	20%	§19.503
SN-11	20%	§19.503
SN-13A	20%	§19.503

SN	Limit	Regulatory Citation
SN-13B	20%	§19.503
SN-13C	20%	§19.503
SN-14	20%	§19.503
SN-15	20%	§19.503

4. The permittee will not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [§18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]
5. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN- 04 and SN-05 Conditions

6. The permittee will cease operation of the Scotch Marine-type boilers (SN-04 and SN-05) within sixty (60) days of the wood-fired boilers (SN-13A, SN-13B, and SN-13C) achieving the maximum production rate, but no later than one hundred and eighty (180) days after initial start-up of SN-13A, SN-13B, and SN-13C, whichever is sooner. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN- 09 Conditions

7. The permittee will not process more than 35.04 million board feet of lumber through the eight drying kilns with individual capacities of 70,000 board feet and through the four kilns with individual capacities of 100,000 board feet at the facility per consecutive 12-month period during Phase One. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #7. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Anthony Timberlands, Inc.
Permit #: 1355-AR-3
AFIN: 10-00070

9. The permittee will cease operations of the eight kilns with individual capacities of 70,000 board feet within sixty (60) days of the seven track kilns with individual capacities of 102,000 board feet achieving the maximum production rate, but no later than one hundred and eighty (180) days after the initial start-up of the track kilns, whichever is sooner. At this time, the permittee will comply with the Phase Two emissions limits. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee will not process more than 40 million board feet of lumber through the seven drying kilns with individual capacities of 102,000 board feet and through the four kilns with individual capacities of 100,000 board feet at the facility per consecutive 12-month period during Phase Two. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
11. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #10. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN- 12 Conditions

12. The permittee will not exceed the limits on chemicals used in the chemical dip vat (SN-12) listed in the following table. [§19.703 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 9 – SN-12 Usage Limits

Chemical	Density (lb/gal)	VOC Content (lb/gal)	HAP Content (wt. %)		Allowable 12 month usage (Gallons)
Chemical A	9.01	6.7	DEGMME	60	3625
			Methanol	2	
Chemical B	9.88	No VOCs Allowed	No HAPs Allowed		No Limit

13. The permittee will maintain records of the amount of chemical compounds for use in the dip tank received at this facility and the VOC content of these compounds. 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 and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Anthony Timberlands, Inc.
Permit #: 1355-AR-3
AFIN: 10-00070

14. The permittee may use chemical compounds containing HAPs other than those listed above 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 #2 are not exceeded. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. The permittee will maintain records of the HAPs contained in the chemical compounds used at SN-12. These records will include the name of the HAP being substituted, the weight percent of the HAP being substituted, and the TLV 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 and made available to Department personnel upon request. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
16. The permittee will demonstrate that the degree of accuracy of the calculations used to determine emissions is sufficient to prove that the major source thresholds have not been exceeded. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-13A, SN-13B, and SN-13C Conditions

17. 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]
18. 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 General Condition #7. 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 General Condition #7. The Department reserves the right to select the boiler to be tested. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]
19. 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 General Condition #7. Test results will be maintained on-site, made available to Department personnel upon request, and will be submitted to the Department in accordance with General Condition #7. The Department reserves the right to select the boiler to be tested. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]

Anthony Timberlands, Inc.
Permit #: 1355-AR-3
AFIN: 10-00070

NSPS Requirements

20. 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-13, 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]



Anthony Timberlands, Inc.
Permit #: 1355-AR-3
AFIN: 10-00070

Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated **September 9, 2003**.

Table 10 - Insignificant Activities

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

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that 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 that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [§19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [§19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Anthony Timberlands, Inc.
Permit #: 1355-AR-3
AFIN: 10-00070

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

7. The permittee will 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) newly constructed or 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) existing equipment already operating according to the time frames set forth by the Department. 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 must submit compliance test results to the Department within thirty (30) days after the completion of testing. [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee will provide: [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - 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.
9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [§19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [§19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.

Anthony Timberlands, Inc.

Permit #: 1355-AR-3

AFIN: 10-00070

- b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.
11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [§19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of

Anthony Timberlands, Inc.
Permit #: 1355-AR-3
AFIN: 10-00070

the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [§19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]

APPENDIX A