

# OPERATING AIR PERMIT

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

Permit #: 1681-AOP-R2

IS ISSUED TO:

Anthony Forest Products Company  
1236 Urbana Road  
Urbana, AR 71768  
Union County  
CSN: 70-0473

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:

January 13, 1998 and January 12, 2003

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

\_\_\_\_\_  
Keith A. Michaels

\_\_\_\_\_  
Date Modified

## SECTION I: FACILITY INFORMATION

<b>PERMITTEE:</b>	Anthony Forest Products Company
<b>CSN:</b>	70-0473
<b>PERMIT NUMBER:</b>	1681-AOP-R2
<b>FACILITY ADDRESS:</b>	1236 Urbana Road Urbana, AR 71768
<b>COUNTY:</b>	Union
<b>CONTACT POSITION:</b>	Mr. Russ Anthony, Vice-President
Alternate	Mr. Mark Young, Safety Director
<b>TELEPHONE NUMBER:</b>	(870) 962-3206
<b>REVIEWING ENGINEER:</b>	M. Lloyd Davis, P. E.
<b>UTM North-South (X):</b>	3668.8 km
<b>UTM East-West (Y):</b>	551.7 km

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## **SECTION II: INTRODUCTION**

Anthony Forest Products Company operates a sawmill and ancillary operations in Urbana, Arkansas. Raw materials (pine logs) are delivered by contractor log trucks. These logs are routed directly to sawmill log decks or to wet-log storage. Water is sprayed onto the logs in wet log storage to prevent stain and insect damage.

Logs are taken by truck to the sawmill where they are debarked and sawed into cants or rough lumber. The lumber is then edged and trimmed. Trimmings and edgings are routed to a chipper. Chips are pneumatically conveyed to shaker screens where blocks and fines are removed. The chips are then conveyed to a chip bin and eventually loaded into tractor trailers. Bark and sawdust are conveyed to boiler fuel storage. Excess bark and sawdust goes to truck loading sites. Blocks are routed back to the chipper.

From the sawmill, the lumber is stored and stacked. The lumber is then dried in kilns. The dry kilns may be heated by either direct fired natural gas burners (Dry Kiln #1) or by steam generated in wood burning boilers (Dry Kilns #2 and #3). Permitting of the two new wood fueled boilers, a third dry kiln, a new cyclone, and other equipment are specifically requested in this permit application. The permit application is also required under Title V, as emissions of particulates, VOCs, and CO will all be over 100 tpy after the proposed changes. The facility is also subject to NSPS Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, as the new boilers exceed 10 MMBTU/hr maximum design heat input capacity.

The effect of the proposed changes in operating capacity will be to increase emissions for all of the criteria pollutants and VOCs. The limitation for particulates will increase from 111.7 tpy to 134.8 tpy as a result of the increased usage of wood waste as a fuel. The limitation for CO will increase from 7.0 tpy to 135.4 tpy; for NO<sub>x</sub> the emissions will increase from 27.7 tpy to 89.5 tpy. Significant amounts of metallic oxides will also be emitted from the wood-fired boilers, although 90% of the metals will be sodium and potassium. Heavy metal emissions from the combustion of wood waste are estimated at 4.0 tpy, with HAPs calculated at 0.6 tpy.

Gasoline and diesel fuel storage tanks on the site qualify as insignificant sources of pollution.

**The present minor modification was drafted in response to a request from Anthony Forest Products to change specific condition #18 to allow readings of steam production rates every 24 hours instead of the hourly rates previously required.**

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM <sub>10</sub>	30.8	134.8	
		SO <sub>2</sub>	1.1	4.8	
		VOC	35.2	154.2	
		CO	30.9	135.4	
		NO <sub>x</sub>	20.4	89.5	
		HAPs	0.2	0.6	
		Heavy Metals***	1.0	4.0	
01	Dry Kiln #1  * "bubbled" with SN-14	PM <sub>10</sub>	0.4	1.8	8
		SO <sub>2</sub>	0.1	0.4	
		VOC	*	*	
		CO	0.9	4.0	
		NO <sub>x</sub>	3.4	14.9	
02	Dry Kiln #2	VOC	"bubbled" with SN-14		8
03	Planer Cyclone #1	PM <sub>10</sub>	7.1	31.1	10
04	Planer Cyclone #2	PM <sub>10</sub>	3.4	14.7	10
05	No Designated Source				
06	No Designated Source				
07	Planer Mill - Fugitive Emissions	PM <sub>10</sub>	1.9*	8.2	12
08	No Designated Source				
09	No Designated Source				

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
10	No Designated Source				
11	No Designated Source				
12	Wood-Fired Boiler #1	PM <sub>10</sub>	9.0	39.5	13
		SO <sub>2</sub>	0.5	2.2	
		VOC	0.8	3.6	
		CO	15.0	65.7	
		NO <sub>x</sub>	8.5	37.3	
		HAPs	0.1	0.3	
		Heavy Metals***	0.5	2.0	
13	Wood-Fired Boiler #2	PM <sub>10</sub>	9.0	39.5	13
		SO <sub>2</sub>	0.5	2.2	
		VOC	0.8	3.6	
		CO	15.0	65.7	
		NO <sub>x</sub>	8.5	37.3	
		HAPs	0.1	0.3	
		Heavy Metals***	0.5	2.0	
14	Dry Kiln #3	VOC	33.6*	147.0	8
15	Planer Cyclone #3	PM <sub>10</sub>	**	**	10

\* Average hourly rates based on production schedule.

\*\* Cyclone #3 will process dry shavings re-routed from Cyclone #1.

\*\*\* This figure includes metals heavier than Na and K, which represent 7.5% of total speciated metals. Total metal emissions are included in PM/PM<sub>10</sub> emissions for the sources.

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### SECTION III: PERMIT HISTORY

The initial permit #1681-A was issued on March 3, 1996. A Title V permit application was submitted for the Urbana sawmill on July 15, 1996, which included the following proposed changes to the existing SIP permit:

- 1) An increase in annual production at the facility;
- 2) Installation of two wood-fired boilers.
- 3) Installation of a third dry kiln, a cyclone, and other equipment.

The original Title V permit, #1681-AOP-R0, was issued on September 12, 1997. It included some provisions in the specific conditions dealing with visible emissions from the boilers that reflected new EPA enforcement guidelines. These conditions were not included in the original Draft permit that had been submitted to Anthony Forest Products, and the company challenged these changes because they had been denied an opportunity to respond.

A revised version was prepared after discussion with the applicant, and issued as 1681-AOP-R1 on January 13, 1998.

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**SECTION IV: EMISSION UNIT INFORMATION**

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**SN-01, SN-02, and SN-14                      Dry Kilns #1, #2, and #3**

**Wood Drying Operations**

These dry kilns dehydrate lumber continuously, 8,760 hr/year. Currently Dry Kiln #1 is direct-fired with natural gas. Dry Kilns #2 and #3 will operate exclusively on steam from wood fired boilers.

The permitted production rate will increase from 63 MMBF/yr to 84 MMBF/yr, and VOC emissions from the dried lumber will change from 110.3 tpy to 147.0 tpy. VOCs emitted during the drying operation have been “bubbled” under SN-14, Dry Kiln #3. A plant limitation of 84 MMBF of lumber per 12 month consecutive period has been included for all drying kilns.

**Specific Conditions**

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), effective February 15, 1999, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

Source Number	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
01	PM <sub>10</sub>	0.4	1.8
	SO <sub>2</sub>	0.1	0.4
	VOC	*	*
	CO	0.9	4.0
	NO <sub>x</sub>	3.4	14.9
02	VOC	*	*
14	VOC	33.6**	147.0

\* Emissions included in SN-14

\*\* Average hourly rates based on production schedule



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2. Pursuant to §18.501 of the Arkansas Air Pollution Control Code (Regulation 18), effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304, §8-4-311, the permittee shall not cause to be discharged to the atmosphere from Dry Kiln #1 gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.
3. Pursuant to §19.705 of Regulation # 19, and 40 CFR 52, Subpart E, the permittee shall conduct daily observations of the opacity from SN-01 and keep a record of these observations. If non-routine visible emissions are detected, the permittee shall immediately take corrective action. If the non-routine visible emissions continue, the permittee may conduct a 6-minute opacity reading in accordance with EPA Reference Method #9 to verify compliance. The results of these observations and Method #9 opacity readings shall be kept on site and made available for inspection upon request.
4. Pursuant to §19.705 of Regulation # 19, A.C.A. §8-4-203 as referenced by §8-4-304, §8-4-311, and 40 CFR 70.6, the facility shall be limited to drying a total of 84 MMBF of lumber in any 12 month consecutive period in the three drying kilns.
5. Pursuant to §19.705 of Regulation # 19, A.C.A. §8-4-203 as referenced by §8-4-304, §8-4-311, and 40 CFR 70.6, natural gas usage shall not exceed 211 MMCF for Kiln #1.
6. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Conditions #1, #2, #4, and #5, and which may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's kiln production and natural gas usage data shall be submitted in accordance with General Provision 7.

**SN-03, SN-04, and SN-15 Planer Cyclones**

**Plant Dust Collection**

Dried lumber is stored in protected areas before planing. The dried lumber is planed in the planer mill prior to shipping. Two planers, a hammer hog, a trimmer, a rip saw, and a resaw are located in the Planer Mill. This equipment has two associated cyclones, with vent designations SN-03 and SN-04. The SN-03 cyclone (#1) collects material (primarily shavings and sawdust) from the large planer (Planer #1), from the hammer hog, and from the recut saw and the rip saw located in the planer building. The SN-04 cyclone (#2) collects material from the smaller planer.

In order to insure the quality of wood fuel fed to the boilers, dry shavings will be re-routed intermittently from Planer Cyclone #1 (SN-03) to Planer Cyclone #3, which will be mounted above the dry wood fuel storage. Planer Cyclone #1 and Planer Cyclone #3 will not be operated simultaneously, so that combined emissions from these two sources will be the same as those itemized under SN-03.

**Specific Conditions**

- Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

Source Number	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
03	PM <sub>10</sub>	7.1	31.1
04	PM <sub>10</sub>	3.4	14.7
15	PM <sub>10</sub>	“Bubbled” with SN-03	

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8. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304, §8-4-311, the permittee shall not cause to be discharged to the atmosphere from cyclones SN-03, SN-04, and SN-15 gases which exhibit an opacity greater than 20%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.
9. Pursuant to §19.705 of Regulation #19 and 40 CFR 52, Subpart E, the permittee shall conduct daily observations of the opacity from SN-03, SN-04, and SN-15 and keep a record of these observations. If non-routine visible emissions are detected, then the permittee shall immediately take corrective action. If the non-routine visible emissions continue, the permittee may conduct a 6-minute opacity reading in accordance with EPA Reference Method #9 to verify compliance. The results of these observations and the Method #9 opacity readings shall be kept on site and made available for inspection upon request. Anthony Forest Products Company shall keep records of upset conditions which result in opacity readings at Cyclones SN-03, SN-04, and SN-15 greater than 20% for more than 30 minutes, including total elapsed time during which the opacity limit is exceeded.
10. Pursuant to §19.705 of Regulation #19, A.C.A. §8-4-203 as referenced by §8-4-304, §8-4-311, and 40 CFR 70.6, the amount of lumber processed through the Planer Mill shall not exceed 91 MM board feet during any consecutive 12 month period.
11. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Conditions #7, #8, and #10, and may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's Planer Mill production data shall be submitted in accordance with General Provision 7.

**SN-07 Fugitive Emissions - Planer Mill**

**Lumber Processing**

Dried lumber is stored in protected areas before planing. The dried lumber is planed in the Planer Mill prior to shipping. Two planers, a hammer hog, a trimmer, a rip saw, and a resaw are located in the planer mill. Hourly emission rates are average figures, since production rates vary.

**Specific Conditions**

12. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

Source Number	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
07	PM <sub>10</sub>	1.9**	8.2

\*\* Average hourly rates based on production schedule

13. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, to ensure compliance with particulate limitations, the permittee shall operate each Planer machine blower whenever the Planer machine to which that blower is attached is in operation.

**SN-12 and SN-13      Wood-Fired Boilers #1 and #2**

**Plant Steam Generation**

The proposed wood fueled boilers will supply steam to the kilns, and will burn southern pine sawdust, bark, and other wood residue, including shavings.

The products of combustion will be exhausted through two boiler stacks (SN-12 and SN-13). Stack heights are 38 feet, stack diameters will be 2-3 feet, exit velocity will be 30-70 ft/sec, with a gas temperature in the range of 250-600° F.

The two boilers supplied by Wellons, Inc., are affected facilities as defined in Paragraph 60.40C of NSPS Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units). However, the boilers have a maximum design input capacity of 29.56 MM Btu/hr, below the 30 MMBtu/hr threshold limit for the particulate standard contained in Paragraph 60.43c of Subpart Dc. Therefore the facility is subject only to the notification and record keeping requirements of Paragraph 60.7 of the NSPS regulations. Based on the maximum throughput rate of 20,400 lb/hr of steam at 300 psig and 422°F, and feed water at 220°F, actual heat output has been calculated at 20.8 MMBTU/hr.

**Specific Conditions**

14. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

Source Number	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
12	PM <sub>10</sub>	9.0	39.5
	SO <sub>2</sub>	0.5	2.2
	VOC	0.8	3.6
	CO	15.0	65.7
	NOx	8.5	37.3

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Source Number	Pollutant	Emission Rate (lb/hr)	Emission Rate (tpy)
13	PM <sub>10</sub>	9.0	39.5
	SO <sub>2</sub>	0.5	2.2
	VOC	0.8	3.6
	CO	15.0	65.7
	NO <sub>x</sub>	8.5	37.3

Oxides and salts of Na and K are included in particulate matter emissions.

15. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304, §8-4-311, the permittee shall not exceed at SN-12 and SN-13 combined the hazardous air pollutant (HAP) emission rates set forth in the following table.

HAP	lb/hr	tpy
HAPs	0.2	0.6
Heavy Metals***	1.0	4.0

\*\*\* Metals heavier than Na and K represent 7.5% of total metals.

16. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304, §8-4-311, the permittee shall not cause to be discharged to the atmosphere from SN-12 and SN-13 any gases which exhibit an opacity greater than 20% (6-minute average). The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.
17. Pursuant to §19.705 of Regulation #19 and 40 CFR 52, Subpart E, the permittee shall conduct daily observations of the opacity from SN-12 and SN-13 and keep a record of these observations. The results of these observations shall be kept on-site and made available for inspection on request.

If emissions which are not routine for the process are detected, the permittee shall immediately investigate the cause of the abnormality and make corrections as necessary. Because the boilers are controlled automatically by a preset program, and because response

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to changes in set points is not instantaneous, the following procedure will be followed: (1) Observe the automatic control system operations by the computer for five minutes to allow the computer to correct the condition. The operator will take note of system parameters which could affect system opacity. He will also note display process alarms which activated prior to the non-routine opacity observance. If, after five minutes, the automatic control system does not effectively reduce the visible emissions, the operator may then use his best judgment as to whether a manual override of the automatic control system is justified; (2) If the operator deems that manual override is justified, then the operator may take any of the following steps: (a) Determine whether the fuel is unacceptably moist; (b) Determine whether the induced draft fan belt is slipping or has broken; (c) Determine whether access doors have been opened; (d) Determine whether the combustion air actuator wiring is intact and functional; (e) Determine whether any other malfunction could be causing non-routine opacity emissions. The permittee may enlist the assistance of the boiler manufacturer; (3) Upon determining the cause of the non-routine opacity emissions, the operator will immediately initiate corrective action. If the non-routine emissions are of such magnitude and duration that an upset condition is deemed to have occurred, and no progress in reducing the opacity is being made, the operator will begin orderly shut-down of the system.

After shut-down, all relevant facts regarding the incident will be documented and a report will be submitted. During the period of non-routine emissions the permittee may conduct a 6-minute opacity reading in accordance with EPA Reference Method #9 to verify compliance. The results of these observations and Method #9 opacity readings shall be kept on site and made available for inspection upon request.

18. Pursuant to §19.705 of Regulation #19, A.C.A. §8-4-203 as referenced by §8-4-304, §8-4-311, and 40 CFR 70.6, the amount of steam produced in Wood-fired Boiler #1 shall not exceed a daily rate of 489,600 pounds per day and shall not exceed 178.7 MM pounds during any consecutive 12 month period. The amount of steam produced in Wood-fired Boiler #2 shall not exceed a daily rate of 489,600 pounds per day and shall not exceed 178.7 MM pounds during any consecutive 12 month period.
19. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Conditions #14, #16, and #18, and may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's steam production data shall be submitted in accordance with General Provision 7.

**SECTION V: PLANTWIDE CONDITIONS**

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
  - a. Sampling ports adequate for applicable test methods
  - b. Safe sampling platforms
  - c. Safe access to sampling platforms
  - d. Utilities for sampling and testing equipment
5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.



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

a) The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated July 15, 1996.

Source No.	Regulation	Description
SN-12 and SN-13	NSPS Subpart Dc Paragraph 60.48c	NSPS Reporting and Record Keeping
	NSPS Subpart Dc Paragraph 60.7	NSPS Notification and record keeping
Facility	Arkansas Regulation 19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation 26	Regulations of the Arkansas Operating Air Permit Program

b) Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

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

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

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

**SECTION VI: DE MINIMIS EMISSION SOURCES**

Pursuant to §26.3(d) of Regulation 26, the following sources are below the de minimis emission levels. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not de minimis, even if this activity meets the criteria of §3(e) of Regulation 26 or is listed below. De minimis emission determinations rely upon the information submitted by the permittee in an application dated July 15, 1996.

SOURCE	DESCRIPTION	REASON INSIGNIFICANT (Using 5/20/96 Reg. #19 List)
Former SN-05	1200 gal. UST (gasoline)	de minimis emissions (C5)
Former SN-06	Fugitive Emissions - Sawmill	not subject to dispersion (B-73)
Former SN-08	2000 gal. UST (diesel fuel)	de minimis emissions (C5)
Former SN-09	750 gal. AST (diesel fuel)	de minimis emissions (C5)
Former SN-10	500 gal. AST (diesel fuel)	de minimis emissions (C5)
Former SN-11	750 gal. AST (diesel fuel)	de minimis emissions (C5)

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be below the de minimis emission levels. Activities included in this list are allowable under this permit and need not be specifically identified.

1. Natural gas-burning equipment with a design rate less than 1 million BTU per hour.
2. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.
3. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
4. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

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5. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
6. Consumer use of office equipment and products, not including commercial printers or businesses primarily involved in photographic reproduction.
7. Janitorial services and consumer use of janitorial products.
8. Internal combustion engines used for landscaping purposes.
9. Laundry activities, except for dry-cleaning and steam boilers.
10. Bathroom/toilet emissions.
11. Emergency (backup) electrical generators at residential locations.
12. Tobacco smoking rooms and areas.
13. Blacksmith forges.
14. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
15. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.<sup>1</sup>
16. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface coatings or products.
17. Portable electrical generators that can be "moved by hand" from one location to another.<sup>2</sup>

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<sup>1</sup> Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

<sup>2</sup>"Moved by hand" means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

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18. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.
19. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.<sup>3</sup>
20. Air Compressors and pneumatically operated equipment, including hand tools.
21. Batteries and battery charging stations, except at battery manufacturing plants.
22. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.<sup>4</sup>
23. Containers of less than or equal to 5 gallons in capacity that do not emit any detectable VOCs or HAPs when closed. This includes filling, blending, or mixing of the contents of such containers by a retailer.
24. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
25. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solution, provided appropriate lids and covers are used and appropriate odor control is achieved.
26. Drop hammers or presses for forging or metalworking.
27. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
28. Vents from continuous emission monitors and other analyzers.
29. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

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<sup>3</sup>Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately.

<sup>4</sup>Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

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30. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.
31. Equipment used for surface coating, painting, dipping, or spraying operations, containing less than 0.4 lb/gal VOCs, no hexavalent chromium, or that emit no more than 0.1 tpy of all other HAPs.
32. Lasers used only on metals and other materials which do not emit HAPs in the process.
33. Consumer use of paper trimmers/binders.
34. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boiler delivering the steam.
35. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
36. Laser trimmers using dust collection to prevent fugitive emissions.
37. Bench-scale laboratory equipment used for physical or chemical analysis.
38. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
39. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
40. Hydraulic and hydrostatic testing equipment.
41. Environmental chambers not using hazardous air pollutant gases.
42. Shock chambers, humidity chambers and solar simulators.
43. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
44. Process water filtration systems and demineralizers.
45. Demineralized water tanks and demineralizer vents.
46. Boiler water treatment operations, NOT including cooling towers.

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47. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.
48. Oxygen scavenging (de-aeration) of water.
49. Ozone generators.
50. Fire suppression system.
51. Emergency road flares.
52. Steam vents and safety relief valves.
53. Steam leaks.
54. Steam cleaning operations.
55. Steam and microwave sterilizers.
56. Site assessment work to characterize waste disposal or remediation sites.
57. Miscellaneous additions or upgrades of instrumentation.
58. Emissions from combustion controllers or combustion shutoff devices.
59. Use of products for the purpose of maintaining motor vehicles operated by the facility, NOT including air cleaning units or such vehicles (i.e. antifreeze, fuel additives).
60. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
61. Emissions from equipment lubricating systems (i.e. oil mist), NOT including storage tanks, unless otherwise exempt.
62. Residential wood heaters, cookstoves, or fireplaces.
63. Barbecue equipment or outdoor fireplaces used in conjunction with any residential or recreational use.
64. Log wetting areas and log flumes.

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65. Periodic use of pressurized air for cleanup.
66. Solid waste dumpsters.
67. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.
68. Natural gas odorizing activities unless the Department determines that a nuisance may occur.
69. Emissions from engine crankcase vents.
70. Storage tanks used for the temporary containment of materials resulting from an emergency reporting of an unanticipated release.
71. Equipment used exclusively to mill or grind coatings and molding compounds where all materials charged are in solventless paste form.
72. Mixers, blenders, roll mills, or calenders for rubber or plastic in which no organic solvents, diluents, or thinners are used.
73. The storage, handling, and handling equipment for bark and wood residues NOT subject to fugitive dispersion offsite (this applies to equipment only).
74. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
75. Tall oil soap storage, skimming, and loading.
76. Water heaters used strictly for domestic (non-process) purposes.
77. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
78. Agricultural operations, including onsite grain storage.

**SECTION VII: GENERAL PROVISIONS**

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.



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6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Pollution Control and Ecology  
Air Division  
ATTN: Air Enforcement  
Post Office Box 8913  
Little Rock, AR 72219

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.6 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department within 24 hours of discovery of the occurrence. The initial report may be made by telephone and shall include:
  - a. The facility name and location,
  - b. The process unit or emission source which is deviating from the permit limit,
  - c. The permit limit, including the identification of pollutants, from which deviation occurs,
  - d. The date and time the deviation started,
  - e. The duration of the deviation,
  - f. The average emissions during the deviation,
  - g. The probable cause of such deviations,
  - h. Any corrective actions or preventive measures taken or being take to prevent such deviations in the future, and
  - i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to

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minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) within 24 hours of discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.

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15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.
19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
  - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.