

ADEQ OPERATING AIR PERMIT

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

Permit #: 1681-AOP-R4

IS ISSUED TO:

Anthony Forest Products Company
1236 Urbana Road
El Dorado, AR 71730
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

June 14, 2002
Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE:	Anthony Forest Products Company
CSN:	70-0473
PERMIT NUMBER:	1681-AOP-R4
FACILITY ADDRESS:	1236 Urbana Road El Dorado, AR 71730
COUNTY:	Union
CONTACT POSITION:	Mark Young
TELEPHONE NUMBER:	(870) 962-3291
FAX Number:	(870) 862-0540
REVIEWING ENGINEER:	Charles Hurt
UTM North-South (Y):	Zone 15 [3688.8]
UTM East-West (X):	Zone 15 [551.7]

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SECTION II: INTRODUCTION

Summary of Permit Activity

Anthony Forest Products Company operates a sawmill and ancillary operations at 1236 Urbana Road in Union County, El Dorado, Arkansas 71730. The facility is requesting to add a 29.8 MMBtu/hr wood-fired boiler (SN-16), a lumber drying kiln (SN-17), and to increase the permitted production capacity to 650,000 tons per year for the planer mill and the lumber kilns to 135,000,000 board feet per year to account for the increased production from the installation of a new kiln. The facility also requests Planer Cyclone #3 (SN-15) to be removed because the cyclone was never installed. The Planer Cyclone #1 does not collect the emissions from the re-cut saw in the Planer Mill. These emissions are included in the Planer Mill Fugitive Emissions (SN-07). Therefore, the source descriptions for the Planer Cyclone #1 and the Planer Mill Fugitive Emissions will be revised. The emissions from the sawmill are declared as an insignificant activity in the previous permit; however, these emissions from the sawmill do not classify as an insignificant activity and will be included in this revision as a permitted emission source. Emissions generated from the bark and saw dust storage piles (SN-18) will also be included in the permit as a permitted emission source.

Process Description

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 belt conveyed to a chip bin and eventually loaded into tractor trailers. Bark and sawdust are conveyed to boiler fuel storage. Excess material is routed to loading stations, loaded into tractor trailers, and transported off-site for use as fuel.

Blocks are routed back to the chipper. Chipper fines are routed to boiler fuel storage, or to a trailer loader for shipment off-site. The blower which conveys the materials to the shaker screens has an associated cyclone which vents inside the sawmill building.

From the sawmill, the lumber is stored and stacked. The lumber is then dried in kilns. The dry kilns are heated by steam generated in wood burning boilers (Dry Kilns #2, #3, and #4). The wood-fired boilers (SN-12, SN-13 and SN-16) that supply steam to the kilns burn southern pine sawdust, bark and other wood residue, including shavings. The boilers have cyclones associated with them to control PM and PM₁₀ emissions.

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Water vapor and volatile organic compounds (VOCs) are evaporated from the wood in the lumber drying process. Dry Kiln #2 is designated as SN-02, Dry Kiln #3 is designated as SN-14, and Dry Kiln #4 is designated as SN-17. These three kilns are steam-heated, exhausting only water vapor and VOCs evaporated from the wood.

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 re-cut saw and the rip saw located in the planer building. The SN-04 cyclone (#2) collects material from the smaller planer.

Regulations

The facility is subject to Regulation 18, *Arkansas Air Pollution Control Code*, Regulation 19, *Regulations of the Arkansas Plan of Implementation for Air Pollution Control*, and Regulation 26, *Regulations of the Arkansas Operating Air Permit Program*. The facility is also subject to NSPS Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, as the total maximum design heat input capacity exceeds 10 MMBtu/hr. A copy of Subpart Dc can be found in Appendix A.

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	38.0	166.5	N/A
		PM ₁₀	36.7	160.2	
		SO ₂	1.5	6.6	
		VOC	108.7	202.0	
		CO	45.0	197.1	
		NO _x	25.6	112.3	
		HAPs*		0.3	

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Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Air Contaminants **		Heavy Metals ^c	0.9	4.2	
01	Dry Kiln #1	Source removed from service.			
02	Dry Kiln #2	VOC	31.3 ^a	191.2 ^b	9
03	Planer Cyclone #1	PM PM ₁₀	7.1 7.1	31.1 31.1	10
04	Planer Cyclone #2	PM PM ₁₀	3.4 3.4	14.7 14.7	10
06	Sawmill - Fugitives	PM PM ₁₀	7.0 7.0	30.4 30.4	12
07	Planer Mill - Fugitives	PM PM ₁₀	5.8 2.9	25.2 12.6	12
12	Wood-Fired Boiler #1 (29.6 MMBtu/hr with cyclone)	PM PM ₁₀ SO ₂ VOC CO NO _x HAPs Heavy Metals ^c	4.8 4.8 0.5 0.8 15.0 8.5 0.1 0.3	21.1 21.1 2.2 3.6 65.7 37.3 0.5 1.4	14

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
13	Wood-Fired Boiler #2 (29.6 MMBtu/hr with cyclone)	PM PM ₁₀ SO ₂ VOC CO NO _x HAPs Heavy Metals ^c	4.8 4.8 0.5 0.8 15.0 8.5 0.1 0.3	21.1 21.1 2.2 3.6 65.7 37.3 0.5 1.4	14
14	Dry Kiln #3	VOC	37.5 ^a	191.2 ^b	9
15	Planer Cyclone #3	Source never installed.			
16	Wood-Fired Boiler #3 (29.8 MMBtu/hr with cyclone)	PM PM ₁₀ SO ₂ VOC CO NO _x HAPs Heavy Metals ^c	4.8 4.8 0.5 0.8 15.0 8.5 0.1 0.3	21.1 21.1 2.2 3.6 65.7 37.7 0.5 1.4	14
17	Dry Kiln #4	VOC	37.5 ^a	191.2 ^b	9
18	Bark and Sawdust Storage Piles - Fugitives	PM PM ₁₀	3.3 1.9	14.4 8.1	18

* HAPs included in the VOC totals are indicated by an *. Other HAPs are not included in any other totals unless specifically stated.

** Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not classified as VOC or HAPs.

Superscript notes:

a. Maximum average hourly emissions based on maximum capacity of the kiln.

b. Bubbled annual VOC emissions for SN-02, SN-14, and SN-17

c. Figures include metals heavier than Na and K, which represent 7.5% of total speciated metals.

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Total metal emissions are included in the particulate emissions for these 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.

Permit #1681-AOP-R2 was issued on August 6, 1999. This permit changed the required hourly steam readings in the wood-fired boilers from hourly readings to a maximum 24 hour rate of 489,600 pounds per day.

Permit #1681-AOP-R3 was issued on September 18, 2001. The Lumber Dry Kiln #1 (SN-01) has been removed from service as a result of a fire that destroyed the kiln and combustion equipment in April 2000. The permit minor modification also allowed increased production capacity for the Planer Mill (SN-03, 04, 07, and 15) and the two remaining Dry Kilns (SN-02 and 14). VOC annual emissions from Dry Kilns #2 and #3 have increased by 19.25 tpy, with decreases in other criteria pollutants based on revised estimates. There were no new emission sources.

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SECTION IV: EMISSION UNIT INFORMATION

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SN-02, SN-14, and SN-17 Dry Kilns #2, #3, and #4

Wood Drying Operations

Dry kilns #2, #3, and #4 dehydrate lumber continuously 8,760 hours per year. Dry Kilns #2, #3, and #4 will operate exclusively on steam from wood fired boilers.

The permitted production rate will increase from 95 MMBF/yr to 135 MMBF/yr, and VOC emissions from the dried lumber will change from 166.25 tpy to 191.2 tpy.

Specific Conditions

1. Pursuant to §19.501 et seq. of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by hourly emission rate based on equipment capacity and compliance with the throughput limits of Specific Condition #2.

Pollutant	lb/hr	tpy
VOC	106.3**	191.2*

* Bubbled annual VOC emissions for SN-02, SN-14, and SN-17

** Maximum average hourly emissions based on maximum capacity of the kilns.

2. 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 Part 70.6, the facility shall be limited to drying a total of 135 MMBF of lumber in any 12 month consecutive period in the three drying kilns.
3. 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 and #2 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 data shall be submitted to the Department in accordance with General Provision #7.

SN-03 and SN-04 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 re-cut saw and the rip saw located in the planer building. The SN-04 cyclone (#2) collects material from the smaller planer.

Specific Conditions

4. 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. Compliance will be demonstrated by operating the cyclones as prescribed in Specific Conditions #6 and #7, and also the throughput limits of Specific Condition #8.

Source Number	Pollutant	lb/hr	tpy
03	PM ₁₀	7.1	31.1
04	PM ₁₀	3.4	14.7

5. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18), effective July 1, 1997, the permittee shall not exceed emission rates set forth in the following table. Compliance will be demonstrated by operating the cyclones as prescribed in Specific Conditions #6 and #7, and also the throughput limits of Specific Condition #8.

Source Number	Pollutant	lb/hr	tpy
03	PM	7.1	31.1
04	PM	3.4	14.7

6. 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

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SN-03 and SN-04 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.

7. Pursuant to §19.705 of Regulation #19 and 40 CFR 52, Subpart E, daily observations of the opacity from SN-03 and SN-04 shall be conducted by personnel familiar with the permittee's visible emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained, but not necessarily certified, in EPA Reference Method 9. If visible emissions in excess of the permitted opacity are detected, the permittee shall immediately take corrective action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions comply with the permitted opacity following the corrective action. The permittee shall maintain records which demonstrate compliance with this specific condition. The records shall be updated daily, kept on site, and made available to Department personnel upon request. The permittee shall maintain the following records:
 - A. The date and time of the observation;
 - B. Detection of visible emissions over the permitted limits;
 - C. The cause of the exceedance of the opacity limit and the corrective limit after the corrective action was taken;
 - D. The name of the person conducting the opacity observations.
8. 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 135 MMBF during any consecutive 12 month period.
9. 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 #4, #5, #6 and #8, 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 to the Department in accordance with General Provision #7.

SN- 06 and SN-07 Fugitive Emissions - Sawmill and Planer Mill

Lumber Processing

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 belt conveyed to a chip bin and eventually loaded into tractor trailers. Bark and sawdust are conveyed to boiler fuel storage. Excess material is routed to the loading stations, loaded into tractor trailers, and transported off-site for use as fuel.

Blocks are routed back to the chipper. Chipper fines are routed to the boiler fuel storage, or to a trailer loader for shipment off-site. The blower which conveys the materials to the shaker screens has an associated cyclone which vents inside the sawmill building.

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

10. 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. Compliance will be demonstrated by compliance with Specific Conditions #2 and #12.

Source Number	Pollutant	lb/hr	tpy
06	PM ₁₀	7.0	30.4
07	PM ₁₀	2.9	12.6

* Average hourly rates based on production schedule

11. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed emission rates set forth in the following table. Emission rates are based on equipment maximum. Compliance will be demonstrated by compliance with Specific Conditions #2 and #12.

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Source Number	Pollutant	lb/hr	tpy
06	PM	7.0	30.4
07	PM	5.8	25.2

* Average hourly rates based on production schedule

12. 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 the particulate limitations for SN-07, the permittee shall operate each Planer machine blower whenever the Planer machine to which that blower is attached is in operation.

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SN-12, SN-13, and SN-16 Wood-Fired Boilers #1,#2, and #3

Plant Steam Generation

The wood fueled boilers supply steam to the kilns, and burn southern pine sawdust, bark, and other wood residue, including shavings. The products of combustion are exhausted through three boiler stacks (SN-12, SN-13, and SN-16). Each boiler is equipped with a cyclone to control particulate emissions.

The three 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 two existing boilers have a maximum design input capacity of 29.6 MM Btu/hr each, and the new boiler has a design input capacity of 29.8 MMBtu/hr. The boilers are 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 422°F steam at 300 psig, and feed water at 220°F for Boiler #1 and Boiler #2, actual heat output has been calculated at 20.8 MMBtu/hr. Based on the maximum throughput rate of 20,700 lb/hr of 366°F steam at 150 psig, and feed water at 220°F for Boiler #3, actual heat output has been calculated at 20.9 MMBtu/hr.

Specific Conditions

13. 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. Compliance will be demonstrated by compliance with Specific Conditions #15, #17, and #18.

Source Number	Pollutant	lb/hr	tpy
12	PM ₁₀	4.8	21.1
	SO ₂	0.5	2.2
	VOC	0.8	3.6
	CO	15.0	65.7
	NO _x	8.5	37.3

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Source Number	Pollutant	lb/hr	tpy
13	PM ₁₀	4.8	21.1
	SO ₂	0.5	2.2
	VOC	0.8	3.6
	CO	15.0	65.7
	NO _x	8.5	37.3
16	PM ₁₀	4.8	21.1
	SO ₂	0.5	2.2
	VOC	0.8	3.6
	CO	15.0	65.7
	NO _x	8.5	37.7

14. 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, SN-13, and SN-16 the hazardous air pollutant (HAP) emission rates set forth in the following table. Compliance will be demonstrated by compliance with Specific Conditions #15, #17, and #18.

Source Number	Pollutant	lb/hr	tpy
12	PM	4.8	21.1
	HAPs	0.1	0.5
	Heavy Metals	0.3	1.4
13	PM	4.8	21.1
	HAPs	0.1	0.5
	Heavy Metals	0.3	1.4
16	PM	4.8	21.1
	HAPs	0.1	0.5
	Heavy Metals	0.3	1.4

15. 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, SN-13, and SN-16 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.

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16. 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, SN-13, and SN-16 and keep a record of these observations. The results of these observations shall be kept on-site and made available for inspection on request.
17. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from sources SN-12, SN-13, and SN-16 shall be conducted by personnel familiar with the permittee's visible emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained, but not necessarily certified, in EPA Reference Method 9. If visible emissions in excess of the permitted opacity are detected, the permittee shall immediately take corrective action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions comply with the permitted opacity following the corrective action. The permittee shall maintain records which demonstrate compliance with this specific condition. The records shall be updated daily, kept on site, and made available to Department personnel upon request. The permittee shall maintain the following records:
 - A. The date and time of the observation;
 - B. Detection of visible emissions over the permitted limits;
 - C. The cause of the exceedance of the opacity limit and the corrective limit after the corrective action was taken;
 - D. The name of the person conducting the opacity observations.
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 each Wood-fired Boiler (#1, #2, and #3) shall not exceed a daily rate of 489,600 pounds per day or exceed 178.7 MM pounds during any consecutive 12 month period for each boiler.
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 #13, #15, and #18, and the records may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, kept on site, and provided to Department personnel upon request. An annual total and each individual month's steam production data shall be submitted to the Department in accordance with General Provision #7.
20. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall test source SN-16 while the source is operating at or above 90% of rated capacity using EPA Reference Methods 201A or 202 for PM₁₀. These tests shall be performed in accordance with Plantwide Condition #3. If the facility passes the PM₁₀ tests, the tests shall then be

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repeated once every five years. Failure of any test will require the permittee to repeat the testing every other year. Test results shall be maintained on-site, made available to Department personnel upon request, and shall be submitted to the Department in accordance with General Provision #7.

21. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall perform a one time test source SN-16 while the source is operating at or above 90% of rated capacity using EPA Reference Method 10 for CO. This test shall be performed in accordance with Plantwide Condition #3. Test results shall be maintained on-site, made available to Department personnel upon request, and shall be submitted to the Department in accordance with General Provision #7.

SN-18 Fugitive Emissions - Bark and Sawdust Storage Piles

Fuel Storage Fugitive Emissions

Bark and sawdust are used as fuel for the wood-fired boilers or shipped offsite. The facility has assumed that half the total suspended particulates (TSP) will be lost to fugitive emissions.

Specific Conditions

22. 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. Compliance will be demonstrated by operation of control equipment at Planer and Sawmill operations.

Source Number	Pollutant	lb/hr	tpy
18	PM ₁₀	1.9	8.1

23. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed emission rates set forth in the following table. Compliance will be demonstrated by operation of control equipment at Planer and Sawmill operations.

Source Number	Pollutant	lb/hr	tpy
18	PM	3.3	14.4

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Anthony Forest Products Company is in compliance with the applicable regulations cited in the permit application. Anthony Forest Products Company will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
20. 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.

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

Acid Rain (Title IV)

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

Title VI Provisions

23. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
- a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
24. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.

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- 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.
25. 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.
26. 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.
27. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated July 25, 2001.

Description	Category
1,000 gal. AST (gasoline)	A-13
500 gal. AST (diesel fuel)	A-3
500 gal. AST (diesel fuel)	A-3
1,000 gal. AST (diesel fuel)	A-3
1,000 gal. AST (diesel fuel)	A-3

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

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 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 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, 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 §26.406 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 CFR 70.6(a)(1)(ii) and §26.701(A)(2) 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 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) 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;

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- e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) 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 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

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

8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.701(C)(3)(b) of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
- a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,
 - e. The duration of the deviation,
 - f. The average emissions during the deviation,
 - g. The probable cause of such deviations,

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- h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
- i. The name of the person submitting the report.

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

- 9. Pursuant to 40 CFR 70.6(a)(5) and §26.701(E) 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 CFR 70.6(a)(6)(i) and §26.701(F)(1) 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 CFR 70.6(a)(6)(ii) and §26.701(F)(2) 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 CFR 70.6(a)(6)(iii) and §26.701(F)(3) 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.

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13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.701(F)(5) of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 CFR 70.6(a)(7) and §26.701(G) of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.701(H) 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 CFR 70.6(a)(9)(i) and §26.701(I)(1) 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 CFR 70.6(b) and §26.702(A) and (B) 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.

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19. Pursuant to 40 CFR 70.6(c)(1) and §26.703(A) 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 CFR 70.6(c)(2) and §26.703(B) of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 CFR 70.6(c)(5) and §26.703(E)(3) of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.704(C) of Regulation #26, nothing in this permit shall alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including

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- the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
- 23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

INVOICE REQUEST FORM

PDS-_____

Date June 26, 2002

<input checked="" type="checkbox"/>	Air
<input type="checkbox"/>	NPDES
<input type="checkbox"/>	Stormwater
<input type="checkbox"/>	State Permits Branch
<input type="checkbox"/>	Solid Waste

CSN 70-0473

Facility Name Anthony Forest Products Company

Invoice Mailing Address PO Box 338

Urbana, Arkansas 71768

<input type="checkbox"/>	Initial
<input type="checkbox"/>	Modification
<input type="checkbox"/>	Annual

Permit Number 1681-AOP-R4

Permit Description Title 5

Permit Fee Code A

Amount Due\$_____

Engineer_____

Paid? ☐No ☐Yes Check #_____

Comments: Air Permit Fee Calculation

Public Notice

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

Anthony Forest Products Company, (CSN: 70-0473), operates a sawmill and ancillary operations at 1236 Urbana Road in Union County, El Dorado, Arkansas 71730. The facility is adding a 29.8 MMBtu/hr wood fired boiler, a drying kiln, and increasing its wood drying process annual throughput to 135 million board feet. The increase in annual emissions in tons per year at this facility will be: PM 24.5, PM₁₀ 26.8, SO₂ 2.2, VOC 20.5, CO 65.7, NO_x 37.7, HAPs 0.9, and Heavy Metals 0.2.

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

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

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Barton Library E. Fifth & N. Jefferson, El Dorado, 71730. This information may be reviewed during normal business hours.

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

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

Dated this

Richard A. Weiss
Interim Director