

# **ADEQ OPERATING AIR PERMIT**

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

**Permit No. : 1681-AOP-R6**

**Renewal #1**

**IS ISSUED TO:**

**Anthony Forest Products Company**

**Urbana, AR 71768**

**Union County**

**AFIN: 70-00473**

**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:**

**December 16, 2003    AND    December 15, 2008**

**IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.**

**Signed:**

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Mike Bates, Chief  
Air Division

March 23, 2007

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Date Modified

Facility: Anthony Forest Products Company  
Permit No.: 1681-AOP-R6  
AFIN: 7000473

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**Table 1 - List of Acronyms**

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate matter
PM <sub>10</sub>	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO <sub>2</sub>	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound
HBCA	Health Based Compliance Alternative

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**Section I: FACILITY INFORMATION**

PERMITTEE: Anthony Forest Products Company

AFIN: 70-00473

PERMIT NUMBER: 1681-AOP-R6

FACILITY ADDRESS: 1236 Urbana Road  
Urbana, AR 71768

MAILING ADDRESS: PO Box 724  
Strong, AR 71765

COUNTY: Union County

CONTACT POSITION: Kelly Olivier, EHS Coordinator

TELEPHONE NUMBER: 870-962-3206

REVIEWING ENGINEER: Charles Hurt

UTM Zone: 15

UTM North - South (Y): 3669126.84

UTM East - West (X): 551893.98

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## Section II: INTRODUCTION

### Summary of Permit Activity

Anthony Forest Products Company (Anthony) operates a sawmill and ancillary operations in Urbana, Arkansas. Anthony submitted an application to incorporate the applicable requirements of 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*. Anthony also proposed to revise the particulate matter emission limits in order to account for emission control provided by the building enclosure. The VOC and HAP emission limits were also revised in order to correct a rounding error in the previous estimates. Dry Kiln #4 (SN-17) is no longer in operation. The two remaining dry kilns will consume the production capacity of Dry Kiln #4. Permitted PM and HAPs decreased by 25.1 tpy and 5.91 tpy, respectively. Permitted PM<sub>10</sub> and VOC increased by 2.4 tpy and 2.7 tpy, respectively.

There are three boilers (SN-12, SN-13, and SN-16) at the facility which are subject to the requirements of Subpart DDDDD. All three boilers are classified as Existing Large Solid Fuel Boilers because each boiler exceeds 10 MMBTU/hr heat input capacity and combust wood waste. Anthony proposed demonstrating compliance for these boilers through fuel analysis for hydrogen chloride, mercury, and total selected metals (TSM) limits, excluding manganese. Anthony proposed compliance with the TSM standard by excluding manganese and complying with the Health Based Compliance Alternative (HBCA) for manganese separately.

Only parts of the HBCA have been incorporated. The HBCA will be determined to be complete following pending the results of the required manganese test for each boiler. Anthony is required to submit the results of the test and if applicable an application prior to March 13, 2007.

### Process Description

Logs are taken by truck to the Sawmill (SN-06) 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 shake 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 the 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 screen, 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 (Dry Kilns #2 and #3). The dry kilns are heated by steam generated in wood burning boilers.

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

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vapor, VOC, and HAPs evaporated from the wood.

The wood-fuel boilers burn southern pine sawdust, bark, and other wood residue, including shavings. The boiler stacks (designated as SN-12, SN-13, and SN-16) exhaust products of combustion.

Dried lumber is stored in protected areas before planing. The dried lumber is planed in the planer mill prior to shipping. Two planes, a hammer hog, a trimmer, a rip saw, and a re-saw are located in the Planer Mill. This equipment has two associated cyclones, with vent designations SN-03 and SN-04. The SN-03 cyclone (Planer Cyclone #1) collects material (primarily shavings and sawdust) from the large planer (Planer #1), from the hammer hog, and the rip saw located in the planer building. The SN-04 cyclone (Planer Cyclone #2) collects material from the smaller planer. Fugitive emissions associated with these operations are designated as SN-07.

### **Regulations**

The following table contains the regulations applicable to this permit.

**Table 2 – Regulations**

<b>Source No.</b>	<b>Regulation Citations</b>
Facility	Regulation 18, <i>Arkansas Air Pollution Control Code</i>
Facility	Regulation 19, <i>Regulations of the Arkansas Plan of Implementation for Air Pollution Control</i>
Facility	Regulation No. 26, <i>Regulations of the Arkansas Operating Air Permit Program</i>
12, 13, 16	40 CFR Part 60, Subpart Dc – <i>Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units</i>
12, 13, 16	40 CFR Part 63, Subpart DDDDD – <i>National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters Compliance Date: September 13, 2007</i>
Facility	40 CFR Part 63, Subpart DDDD – <i>National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*</i>

\* The facility is subject to the subpart. Other than initial notification, there are no applicable requirements of the subpart.

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The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

**Table 3 – Emission Summary**

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	43.3	189.6	N/A
		PM <sub>10</sub>	31.9	139.1	
		SO <sub>2</sub>	1.5	6.6	
		VOC	70.6	244.4	
		CO	45.0	197.1	
		NO <sub>x</sub>	25.6	112.3	
Total Allowable Non-Criteria Pollutant Emissions (included in VOC totals unless noted otherwise)		Acrolein	0.60	1.80	N/A
		Benzene	0.60	1.80	
		Formaldehyde	1.20	3.80	
		HCl <sup>d</sup>	1.27	5.49	
		Methanol	4.10	13.90	
		Mercury	1.28E-04	5.62E-04	
		Styrene	0.30	0.90	
		TSM <sup>c</sup>	0.84	3.65	
		TSM(excluding Manganese) <sup>c</sup>	0.01032	0.0451	
		Cadmium	2.02E-03	8.84E-03	
		Chromium	1.85E-03	8.11E-03	
		Lead	1.99E-03	8.69E-03	
		Manganese	0.84	3.65	
		Nickel	4.45E-03	0.01943	
02	Dry Kiln #2	VOC	31.3 <sup>b</sup>	236.3 <sup>a</sup>	13
		Methanol	1.90 <sup>b</sup>	13.90 <sup>a</sup>	
		Formaldehyde	0.20 <sup>b</sup>	1.10 <sup>a</sup>	
03	Planer Cyclone #1	PM	7.1	31.1	15
		PM <sub>10</sub>	7.1	31.1	
04	Planer Cyclone #2	PM	3.4	14.9	15
		PM <sub>10</sub>	3.4	14.9	
06	Sawmill	PM	13.8	60.2	17
		PM <sub>10</sub>	7.9	34.3	
07	Planer Mill	PM	5.7	25.2	18
		PM <sub>10</sub>	3.5	15.0	



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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
12	Wood-Fired Boiler #1 (29.56 MMBTU/hr)	PM	2.7	11.9	19
		PM <sub>10</sub>	2.7	11.9	
		SO <sub>2</sub>	0.5	2.2	
		VOC	0.6	2.7	
		CO	15.0	65.7	
		NO <sub>x</sub>	8.5	37.3	
		Acrolein	0.20	0.60	
		Benzene	0.20	0.60	
		Formaldehyde	0.20	0.60	
		HCl	0.42	1.82	
		Mercury	4.26E-05	1.87E-04	
		Styrene	0.10	0.30	
		TSM	0.28	1.21	
		TSM(excluding Mn)	3.43E-03	0.015	
		Cadmium	6.71E-04	2.94E-03	
		Chromium	6.15E-04	2.70E-03	
		Lead	6.60E-04	2.89E-03	
		Manganese	0.28	1.21	
		Nickel	1.48E-03	6.46E-03	
13	Wood-Fired Boiler #2 (29.56 MMBTU/hr)	PM	2.7	11.9	19
		PM <sub>10</sub>	2.7	11.9	
		SO <sub>2</sub>	0.5	2.2	
		VOC	0.6	2.7	
		CO	15.0	65.7	
		NO <sub>x</sub>	8.5	37.3	
		Acrolein	0.20	0.60	
		Benzene	0.20	0.60	
		Formaldehyde	0.20	0.60	
		HCl	0.42	1.82	
		Mercury	4.26E-05	1.87E-04	
		Styrene	0.10	0.30	
		TSM	0.28	1.21	
		TSM(excluding Mn)	3.43E-03	0.015	
		Cadmium	6.71E-04	2.94E-03	
		Chromium	6.15E-04	2.70E-03	
		Lead	6.60E-04	2.89E-03	
		Manganese	0.28	1.21	
		Nickel	1.48E-03	6.46E-03	
14	Dry Kiln #3	VOC	37.5	236.3 <sup>a</sup>	13
		Methanol	2.20 <sup>b</sup>	13.90 <sup>a</sup>	
		Formaldehyde	0.20 <sup>b</sup>	1.10 <sup>a</sup>	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
16	Wood-Fired Boiler #3 (29.75 MMBTU/hr)	PM	2.7	11.9	19
		PM <sub>10</sub>	2.7	11.9	
		SO <sub>2</sub>	0.5	2.2	
		VOC	0.6	2.7	
		CO	15.0	65.7	
		NO <sub>x</sub>	8.6	37.7	
		Acrolein	0.20	0.60	
		Benzene	0.20	0.60	
		Formaldehyde	0.20	0.60	
		HCl	0.43	1.85	
		Mercury	4.29E-05	1.88E-04	
		Styrene	0.10	0.30	
		TSM	0.28	1.23	
		TSM(excluding Mn)	3.46E-03	0.0151	
		Cadmium	6.76E-04	2.96E-03	
		Chromium	6.19E-04	2.71E-03	
		Lead	6.64E-04	2.91E-03	
		Manganese	0.28	1.22	
		Nickel	1.49E-03	6.51E-03	
18	Bark and Sawdust Storage Piles	PM	5.2	22.5	26
		PM <sub>10</sub>	1.9	8.1	

<sup>a</sup> Total VOC, methanol, and formaldehyde emissions for Dry Kilns #2 and #3.

<sup>b</sup> Maximum average hourly emission rate based on maximum kiln cycle capacity.

<sup>c</sup> TSM is included in PM<sub>10</sub> total.

<sup>d</sup> All HAPs except HCl and TSM are included in VOC total. HCl is not included in any total.

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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.

Permit #1681-AOP-R4 was issued on June 14, 2002. Anthony requested 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. Anthony also requested Planer Cyclone #3 (SN-15) to be removed because the cyclone was never installed. The source descriptions for the Planer Cyclone #1 and the Planer Mill emissions were revised. The emissions from the sawmill were declared as an insignificant activity in the previous permits; 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.

Permit #1681-AOP-R5 was issued on December 16, 2003. This was the first Title 5 Renewal for the facility. The facility also requested to install a completely enclosed air lock system to route

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shavings and sawdust from the Planer Mill (SN-07) to an existing fuel storage bin on an as needed basis. PM emissions did not change due to the installation of the air lock system, and the total waste from the Planer Mill did not increase. PM and VOC emissions increased by 48.2 tpy and 39.7 tpy, respectively. PM<sub>10</sub> and Heavy Metals emissions decreased by 23.5 tpy and 1.5 tpy, respectively. Changes in emissions are due to revised methods of calculation and updated emission factors.

## Section IV: SPECIFIC CONDITIONS

### SN-02 and SN-14

#### Dry Kiln #2 and Dry Kiln #3

##### Source Description

Dry kilns #2 and #3 dehydrate lumber continuously, 8,760 hours per year. The kilns are permitted to produce 135 MMBF/yr of dried lumber. They operate exclusively on the steam from the three wood-fired boilers.

##### Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 4 – Plantwide Dry Kiln Maximum Criteria Pollutant Emission Rate**

SN	Pollutant	lb/hr	tpy
02	VOC	31.3 <sup>b</sup>	
14	VOC	37.5 <sup>b</sup>	
Total	VOC	-	236.3 <sup>a</sup>

a Total VOC emissions for Dry Kilns #2 and #3.

b Maximum average hourly emission rate based on maximum kiln cycle capacity.

2. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 5 – Plantwide Dry Kiln Maximum Non-Criteria Pollutant Emission Rate**

SN	Pollutant	lb/hr	tpy
02	Methanol Formaldehyde	1.90 <sup>b</sup> 0.20 <sup>b</sup>	-
14	Methanol Formaldehyde	2.20 <sup>b</sup> 0.20 <sup>b</sup>	-
Total	Methanol Formaldehyde	-	13.90 <sup>a</sup> 1.10 <sup>a</sup>

a Total methanol and formaldehyde emissions for Dry Kilns #2 and #3.

b Maximum average hourly emission rate based on maximum kiln cycle capacity.

3. The facility shall not exceed more than a total of 135 MMBF of kiln dried lumber produced in any consecutive 12 month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

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4. The facility shall maintain records which demonstrate compliance with the limit set in Specific Condition #3 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's kiln production data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

### SN-03 and SN-04

#### Planer Cyclone #1 and Planer Cyclone #2

##### Source Description

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

##### Specific Conditions

5. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 6 – Planer Cyclones #1 and #2 Maximum Criteria Pollutant Emission Rates**

Source Number	Pollutant	lb/hr	tpy
03	PM <sub>10</sub>	7.1	31.1
04	PM <sub>10</sub>	3.4	14.9

6. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 7 – Planer Cyclones #1 and #2 Maximum Non-Criteria Pollutant Emission Rates**

Source Number	Pollutant	lb/hr	tpy
03	PM	7.1	31.1
04	PM	3.4	14.9

7. The permittee shall not cause to be discharged to the atmosphere sources SN-03 and SN-04 visible emissions 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. [Regulation No. 19 §19.501 and 40 CFR Part 52, Subpart E]
8. Daily observations of the opacity from SN-03 and SN-04 shall be conducted by personnel familiar with the visual emissions at the facility. The permittee shall accept such observation for demonstration of compliance. The permittee shall maintain personnel trained, but not necessarily certified, in EPA Reference 9. If visible emissions in excess of the permitted opacity are detected the permittee shall immediately take corrective

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action to identify the cause of the visible emissions, implement corrective actions, and document that visible emissions comply with the permitted opacity following the corrective action. The permittee shall maintain records which demonstrate compliance with Specific Condition #7. The records shall be updated daily, kept on site, and made available to Department personnel upon request. The permittee shall maintain the following records: [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

- 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;
- d. The corrective action taken;
- e. The opacity after corrective action was taken; and
- f. The name of the person conducting the opacity observations.



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## SN-06

### Sawmill

#### Source Description

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 the use fuel.

Blocks are routed back to the chipper. Chipper fines are routed to the boiler fuel storage, or to a tractor 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.

#### Specific Conditions

9. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 8 – Sawmill Maximum Criteria Pollutant Emission Rates**

Source Number	Pollutant	lb/hr	tpy
06	PM <sub>10</sub>	7.9	34.3

10. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 9 – Sawmill Maximum Non-Criteria Pollutant Emission Rates**

Source Number	Pollutant	lb/hr	tpy
06	PM	13.8	60.2

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## SN-07

### Planer Mill

#### Source Description

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. Shavings are transferred by cyclone to a storage bin which unloads to tractor trailers for disposal offsite. There is an air lock system which transfers the shavings on an as needed basis to the green wood fuel storage bin.

#### Specific Conditions

11. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 10 – Planer Mill Maximum Criteria Pollutant Emission Rates**

Source Number	Pollutant	lb/hr	tpy
07	PM <sub>10</sub>	3.5	15.0

12. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 11 – Planer Mill Maximum Criteria Pollutant Emission Rates**

Source Number	Pollutant	lb/hr	tpy
07	PM	5.7	25.2

13. The permittee shall operate each planer machine blower whenever the planer machine to which the blower that is attached is in operation. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

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### SN-12, SN-13, and SN-16

### Wood-Fired Boilers #1, #2, and #3

#### Source Description

The wood-fired 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). The two older boilers have a maximum design input capacity of 29.56 MMBtu/hr each, and the newest boiler has a design input capacity of 29.75 MMBtu/hr. The boilers are below the 30 MMBtu/hr threshold limit for the particulate standard contained in 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.

As required in permit number 1681-AOP-R4, stack testing was performed in March of 2003 for particulate matter and carbon monoxide at SN-16 with each test resulting in emission rates below the permitted emission limits. The test for carbon monoxide was a one time stack test required to demonstrate compliance.

#### Specific Conditions

14. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #16. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 12 – Boilers Maximum Criteria Pollutant Emission Rates**

Source Number	Pollutant	lb/hr	tpy
12	PM <sub>10</sub>	2.7	11.9
	SO <sub>2</sub>	0.5	2.2
	VOC	0.6	2.7
	CO	15.0	65.7
	NO <sub>x</sub>	8.5	37.3

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Source Number	Pollutant	lb/hr	tpy
13	PM <sub>10</sub>	2.7	11.9
	SO <sub>2</sub>	0.5	2.2
	VOC	0.6	2.7
	CO	15.0	65.7
	NO <sub>x</sub>	8.5	37.3
16	PM <sub>10</sub>	2.7	11.9
	SO <sub>2</sub>	0.5	2.2
	VOC	0.4	1.8
	CO	15.0	65.7
	NO <sub>x</sub>	8.5	37.3

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

**Table 13 – Boilers Maximum Non-Criteria Pollutant Emission Rates**

Source Number	Pollutant	lb/hr	tpy
12	PM	2.7	11.9
	Acrolein	0.20	0.60
	Benzene	0.20	0.60
	Formaldehyde	0.20	0.60
	HCl	0.42	1.82
	Mercury	4.26E-05	1.87E-04
	Styrene	0.10	0.30
	TSM	0.28	1.21
	TSM(excluding Mn)	3.43E-03	0.015
	Cadmium	6.71E-04	2.94E-03
	Chromium	6.15E-04	2.70E-03
	Lead	6.60E-04	2.89E-03
	Manganese	0.28	1.21
	Nickel	1.48E-03	6.46E-03
13	PM	2.7	11.9
	Acrolein	0.20	0.60
	Benzene	0.20	0.60
	Formaldehyde	0.20	0.60
	HCl	0.42	1.82
	Mercury	4.26E-05	1.87E-04
	Styrene	0.10	0.30
	TSM	0.28	1.21
	TSM(excluding Mn)	3.43E-03	0.015
	Cadmium	6.71E-04	2.94E-03
	Chromium	6.15E-04	2.70E-03
	Lead	6.60E-04	2.89E-03
	Manganese	0.28	1.21
	Nickel	1.48E-03	6.46E-03

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Source Number	Pollutant	lb/hr	tpy
16	PM	2.7	11.9
	Acrolein	0.20	0.60
	Benzene	0.20	0.60
	Formaldehyde	0.20	0.60
	HCl	0.43	1.85
	Mercury	4.29E-06	1.88E-04
	Styrene	0.10	0.30
	TSM*	0.28	1.23
	TSM(excluding Mn)	3.46E-03	0.0151
	Cadmium	6.76E-04	2.96E-03
	Chromium	6.19E-04	2.71E-03
	Lead	6.64E-04	2.91E-03
	Manganese	0.28	1.22
	Nickel	1.49E-03	6.51E-03

\* Total selected metal emissions are included in the PM and PM<sub>10</sub> emissions for these sources.

16. The amount of steam produced in each wood-fired boiler shall be limited according to the following table. Compliance with this condition shall be demonstrated through compliance with Specific Condition #17. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

**Table 14 – Boilers Maximum Steam Production Rates**

Source Number	Description	Daily Limit (lb Steam/day)	Annual Limit (MM lb/12 month)
12	Boiler #1	489,600	178.7
13	Boiler #2	489,600	178.7
16	Boiler #3	489,600	178.7

17. The facility shall maintain records which demonstrate compliance with the limits set in Specific Condition #16 which may be used by the Department for enforcement purposes. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each individual month's steam production data shall be submitted to the Department in accordance with General Provision #7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]
18. The permittee shall test source SN-16 for PM<sub>10</sub> while the source is operating at or above 90% of rated capacity using EPA Reference Methods 201A with 202. These tests shall be performed in accordance with Plantwide Condition #3. If the facility passes the PM<sub>10</sub> tests, the tests shall then be 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. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]

**Boiler MACT Requirements  
(Including Manganese Health Based Compliance Alternative)**

19. SN-12, SN-13, and SN-16 are subject to and shall comply with applicable provisions of 40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*. Due to their construction date, size, and fuel combusted, the boilers are existing boilers included in the Large Solid Fuel Subcategory. Applicable provisions of Subpart DDDDD include, but are not limited to, the following: [Regulation No. 19 §19.304 and 40 CFR §60.7480]
- a. The permittee shall not discharge to the atmosphere any gases from SN-12, SN-13, or SN-16 that contain the following pollutants in excess of the specified limits. [Regulation No. 19 §19.304 and 40 CFR §63.7500]

**Table 15 –Boiler MACT Emission Standards**

<b>Pollutant</b>	<b>Emission Limit lb / MMBTU</b>
PM or TSM*	0.07 or 0.001
Mercury (Hg)	$9.0 \times 10^{-6}$
HCl	0.09

\* TSM is defined as the combination of the eight metallic hazardous air pollutants, which are arsenic, beryllium, cadmium, chromium, lead, manganese, nickel, and selenium (40 CFR §63.7575).

- b. The permittee shall demonstrate initial compliance no later than 180 days after September 13, 2007. [Regulation No. 19 §19.304 and 40 CFR §63.7510(d)]
- c. If the permittee elects to demonstrate initial compliance with any of the limits in Specific Condition #19 (a) through performance testing, then the permittee shall:
- i. conduct performance tests according to §63.7520 and Tables 5 and 7 of Subpart DDDDD, [Regulation No. 19 §19.304 and 40 CFR §63.7530(a)]
  - ii. conduct a fuel analysis according to §63.7521, and [Regulation No. 19 §19.304 and 40 CFR §63.7530(c)]
  - iii. establish maximum fuel pollutant input levels, as applicable. [Regulation No. 19 §19.304 and 40 CFR §63.7530(c)]
- d. If the permittee elects to demonstrate initial compliance with any of the limits in Specific Condition #19 (a) through fuel analysis, then the permittee shall:

- i. conduct a fuel analysis according to §63.7521 Tables 6 and 8 of Subpart DDDDD and [Regulation No. 19 §19.304 and 40 CFR §63.7530(a)]
  - ii. determine emission rates and establish operating limits according to §63.7530(d), as applicable. [Regulation No. 19 §19.304 and 40 CFR §63.7530(a)]
- e. In order to demonstrate continuous compliance with Specific Condition #19 (a), the permittee shall keep records of the type and amount of fuel combusted during the reporting period to demonstrate all fuel types and fuel mixtures combusted would either result in lower emissions of TSM, HCl, and mercury, than the applicable emission limit for each pollutant (compliance through fuel analysis), or result in lower fuel input of TSM, chlorine, and mercury than the maximum values calculated during the previous performance test (compliance through performance testing). [Regulation No. 19 §19.304 and 40 CFR §63.7540]
- f. If compliance for any limit in Specific Condition #19 (a) is demonstrated through performance testing, the permittee shall conduct subsequent performance tests on an annual basis, between the 10th and 12th month from the previous test. The permittee may conduct performance testing on a less frequent basis as long as the following requirements are met: [Regulation No. 19 §19.304 and 40 CFR §63.7515(a)]
  - i. After three consecutive years demonstrate that the permittee complies with any limit in Specific Condition #19 (a), the permittee can conduct performance testing every third year such that the next performance test occurs no later than 36 months after the previous performance test. [Regulation 19 §19.304 and 40 CFR §63.7515(b)]
  - ii. If a performance test shows noncompliance for any limit in Specific Condition #19 (a), the permittee must conduct performance testing annually for that pollutant until three consecutive performance tests demonstrate compliance with the Boiler MACT emission limit. [Regulation No. 19 §19.304 and 40 CFR §63.7515(d)]
- g. If compliance for any limit in Specific Condition #19 (a) is demonstrated through fuel analysis, the permittee shall conduct subsequent fuel analyses no later than 5 years from the previous analysis. [Regulation No. 19 §19.304 and 40 CFR §63.7515(f)]
- h. The permittee shall submit an application which includes a fuel analysis and/or performance testing results and obtain a revised permit which allows combustion of a new fuel prior to combusting the new fuel. [Regulation No. 19 §19.304 and 40 CFR §63.7515]

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- i. The permittee shall report the results of performance tests and fuel analyses within 60 days after the completion of the performance tests or fuel analyses. In addition to the information required in §63.7550, these reports shall also verify that operating limits have not changed or provide documentation of revised operating parameters established according to §63.7530 and Table 7 of Subpart DDDDD. [Regulation No. 19 §19.304 and 40 CFR §63.7515(g)]
  - j. The permittee shall develop and implement a Startup, Shutdown, Malfunction (SSM) Plan according to the provisions in 40 CFR §63.6(e)(3) or obtain a variance from the US EPA Region VI. [Regulation No. 19 §19.304 and 40 CFR §63.7505]
  - k. The permittee shall submit all applicable notifications by the dates specified in 40 CFR §63.7545. [Regulation No. 19 §19.304 and 40 CFR §63.7515]
  - l. The permittee shall submit a compliance report semiannually to ADEQ and EPA Region VI. The first compliance report shall be postmarked or delivered no later than July 31, 2008, and it shall cover the reporting period between September 13, 2007 and June 30, 2008. Each report thereafter shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. [Regulation No. 19 §19.304 and 40 CFR §63.7550]
  - m. The permittee shall maintain records in accordance with 40 CFR §63.7555. These records shall be kept on site and made available to Department personnel upon request. [Regulation No. 19 §19.304 and 40 CFR §63.7555]
20. The permittee shall operate and maintain SN-12, SN-13, and SN-16 and all associated emission control devices according to the parameters used to define the most recent, technically sound HBCA demonstration which meets the requirements of Appendix A of 40 CFR Part 63, Subpart DDDDD. These parameters include, but are not limited to, the following: [Regulation No. 19 §19.304 and Appendix A of 40 CFR Part 63, Subpart DDDDD]

**Table 16 – Manganese HBCA Demonstration Parameters**

<b>HBCA Parameter</b>	<b>SN-12</b>	<b>SN-13</b>	<b>SN-16</b>
Maximum Heat Input	29.56 MMBtu/hr	29.56MMBtu/hr	29.75 MMBtu/hr
Fuel Mix and Type	100 % Biomass	100% Biomass	100 % Biomass
Control Device	Multiclone	Multiclone	Multiclone
Maximum Manganese Emission Rate*	TBD	TBD	TBD
Manganese Fuel Content	9.31 X 10 <sup>-3</sup> lb Mn/MMBtu	9.31 X 10 <sup>-3</sup> lb Mn/MMBtu	9.31 X 10 <sup>-3</sup> lb Mn/MMBtu
Minimum Distance to Property Boundary	109 m	109 m	109 m



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HBCA Parameter	SN-12	SN-13	SN-16
Stack Area	0.657 m <sup>2</sup>	0.657 m <sup>2</sup>	0.657 m <sup>2</sup>
Vertical Exit Velocity	21.336 m/sec	21.336 m/sec	21.336 m/sec
Stack Gas Temperature	588.71 K	588.71 K	588.71 K
Release Height	11.582 m	11.582 m	13.716 m
Opacity	20%	20%	20%

\* See Specific Condition #24

21. The permittee shall update and resubmit the eligibility demonstration if any of the parameters used to define SN-12, SN-13, and SN-16 as a source eligible for HBCA changes in such a way that results in increase HAP emission and/or increased risk from exposure to emissions. [Regulation No. 19 §19.304 and Appendix A of 40 CFR Part 63, Subpart DDDDD]
22. Prior to making changes to any of the parameters listed in Specific Condition #20, the permittee shall update and resubmit the eligibility demonstration and receive verification from the EPA and ADEQ that the updated demonstration is technically sound and meets the requirements of Appendix A to 40 CFR Part 63, Subpart DDDDD. [Regulation No. 19 §19.304 and Appendix A of 40 CFR Part 63, Subpart DDDDD]
23. The permittee shall maintain records of the information used in developing the eligibility demonstration, including the information specified in section 8 of Appendix A, 40 CFR Part 63, Subpart DDDDD. These records shall be kept on site and be made available to Department personnel upon request. [Regulation No. 19 §19.304 and Appendix A of 40 CFR Part 63, Subpart DDDDD]
24. The permittee shall perform stack testing for Manganese at SN-12, SN-13, and SN-16 in accordance with Plantwide Condition #3 and Table 5 to Subpart DDDDD to demonstrate compliance with the limit specified in Specific Condition #20, Table 16. The testing shall be performed while these boilers are operating at or above 90% maximum rated capacity. Testing shall be conducted every five years after the previous test. The first of such tests shall be conducted and the results shall be included in a permit application prior to the date listed in Specific Conditions # 25. [Regulation No. 19 §19.304 and 40 CFR Part 63, Subpart DDDDD]
25. The permittee shall submit prior to March 13, 2007 a permit application to include the results of the testing required in Specific Condition #24. Until the results of the tests are incorporated into the permit the facility is not eligible for the HBCA for Manganese because the demonstration for eligibility is not complete. [Regulation No. 19 §19.304 and §19.901 and 40 CFR Part 63, Subpart DDDDD, Appendix A, Section 11 (c)]

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## SN-18

### Bark and Sawdust Storage Piles

#### Source Description

Bark and sawdust are used as fuel for the wood-fired boilers or shipped off site.

#### Specific Conditions

26. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 19 §19.501 *et seq.* effective May 28, 2006, and 40 CFR Part 52, Subpart E]

**Table 17 – Bark and Sawdust Storage Piles Criteria Pollutant Emission Rates**

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

27. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 18 – Bark and Sawdust Storage Piles Maximum Non-Criteria Pollutant Emission Rates**

Source Number	Pollutant	lb/hr	tpy
18	PM	5.2	22.5

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## **Section V: COMPLIANCE PLAN AND SCHEDULE**

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: PLANT WIDE CONDITIONS**

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

location and retain all previous versions of the SSM plan for five years. [Regulation No. 19 §19.304 and 40 CFR 63.6(e)(3)]

### **Title VI Provisions**

8. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
  - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
9. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

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10. 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.
11. 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.

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

#### **Permit Shield**

13. 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 Table 19 - Applicable Regulations of this condition.
  - a. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated September 13, 2006.

**Table 19 - Applicable Regulations**

<b>Source No.</b>	<b>Regulation</b>	<b>Description</b>
12, 13, 16	40 CFR 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial – Institutional Steam Generating Units
12, 13, 16	40 CFR Part 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters
Facility	40 CFR Part 63, Subpart DDDD	National Emission Standards for Hazardous Ai Pollutants: Plywood and Composite Wood Products

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## Section VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated **9/13/2006**.

**Table 20 - Insignificant Activities**

Description	Category
1000 gallon AST (gasoline)	A-13
500 gallon AST (diesel fuel)	A-3
500 gallon AST (diesel fuel)	A-3
1000 gallon AST (diesel fuel)	A-3
1000 gallon AST (diesel fuel)	A-3

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

### Section VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.[40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective September 26, 2002]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation No. 26 §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and



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- f. The operating conditions existing at the time of sampling or measurement.
- 6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]
- 7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26 §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]

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

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

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

The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

- b. For all deviations, the permittee will report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a. above. The semi-annual report must include all the information as required in the initial and full report required in 8a. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]
- 9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]
  - 10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]
  - 11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]
  - 12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]

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13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]
14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]
17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]
  - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;

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- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
- 21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The compliance status;
  - c. Whether compliance was continuous or intermittent;
  - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
  - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
- 22. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or
  - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
- 23. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

## **APPENDIX A**

**40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial – Commercial  
– Institutional Steam Generating Units***

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## **APPENDIX B**

**40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters***

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## APPENDIX C

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## APPENDIX D