STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0463-AOP-R17 AFIN: 10-00005

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Georgia-Pacific Wood Products LLC
#1 GP Lane
Gurdon, Arkansas 71743

3. PERMIT WRITER:

Kyle Crane

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Sawmills
NAICS Code: 321113

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
7/24/2019	Modification	Modernization of log processing operation including the modification of log sawing (SN-23), log debarking (SN-24), by-products transfer points (SN-25), plant haul roads (SN-26), the removal of the bark shredder (SN-42), and the installation of the hammer hog (SN-52)

6. REVIEWER'S NOTES:

Georgia-Pacific owns and operates a plywood and lumber facility in Clark County, AR located at 1 GP Lane in Gurdon. This PSD major modification is to modernize the log processing operation including:

- Remove the existing slasher saws (SN-23A), two of the three existing ring debarkers (SN-24B), and the bark shredder (SN-42);
- Install a new log processing line consisting of an enclosed ring debarker with flare reducer and a merchandizer system including crook and bucking saws for cutting logs to length;
- Install a new hammer hog (SN-52);
- Add a new bark bin to By-Product Transfer Points (SN-25);
- Include additional traffic on Plant Haul Roads (SN-26);
- Increase actual throughput through the Lumber Kilns (SN-06, SN-08, and SN-09) including increased steam demand from the Boilers (SN-01 and SN-02).

Annual permitted emissions decrease by 0.9 tons per year (tpy) of PM.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility was last inspected on April 3, 2018 and was found to be in compliance. EPA ECHO shows "No Violation Identified" for CAA compliance.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? Y
If yes, were GHG emission increases significant? N

b) Is the facility categorized as a major source for PSD? Y

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.
This permit modification is subject to PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
09	VOC	PSD
01 and 02	PM_{10}, VOC, CO, NO_x	PSD
07 and 08	VOC, PM	PSD
48 and 49	HAPs	NESHAP ZZZZ
03, 04, 05, 06	HAPs	NESHAP DDDD

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
51	HAPs	NSPS IIII

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N
(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N
If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
N/A		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value

(mg/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

No modeling was performed for this permit modification.

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Acetaldehyde	45.04	4.954	4.3	Y
Acrolein	0.23	0.025	1.06	N
Arsenic	0.01	0.001	0.00603	N
Benzene	1.60	0.176	0.69108	N
Beryllium	0.0020	0.000220	0.005002	N
Cadmium	0.002	0.00022	0.0092	N
Formaldehyde	1.50	0.165	5.43	N
Hexane	1.50	0.165	3.969	Y
Manganese	0.20	0.22	0.302	N
Mercury	0.01	0.001	0.07	Y
Methanol	262.09	28.829	45.08	N
Methyl Isobutyl Ketone	204.83	22.531	0.69	Y
Phenol	19.25	2.117	2.63	N
POM	0.20	0.022	0.38	N
Propionaldehyde	47.52	4.75	0.1	Y
Xylene	434.19	47.761	0.1	Y

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?

Pollutant	PAIL ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Acrolein	2.33	1.44	Y
Arsenic	0.1	0.013	Y
Benzene	16	1.84	Y
Beryllium	0.02	0.00039	Y
Cadmium	0.02	0.011	Y
Formaldehyde	15	12.8	Y
Methanol	2600	233	Y
Phenol	192	10.3	Y
POM	2.0	0.10	Y

c) H_2S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H_2S Standards Y
If exempt, explain: This facility does not emit H_2S

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
01 & 02	PM- Stack test data PM_{10}- NCASI TB884 NO_x- 28.5lb/hr÷135MMBtu/hr CO- Stack test data VOC- NCASI TB884 SO_2- NCASI TB884 PM- AP-42, Section 1.11 PM_{10}- AP-42, Section 1.11 SO_2- AP-42, Section 1.11 NO_x- AP-42, Section 1.11 CO- AP-42, Section 1.11 VOC- AP-42, Section 1.11 HAPs- NCASI TB	0.143 lb/MMBtu[1] = PM 0.161 lb/MMBtu[1] = PM_{10} 0.211 lb/MMBtu[1] = NO_x 0.780 lb/MMBtu[1] = CO 0.050 lb/MMBtu[1] = VOC 0.030 lb/MMBtu[1] = SO_2 2.50 lb/Mgal[2] = PM 1.99 lb/Mgal[2] = PM_{10} 88.2 lb/Mgal[2] = SO_2 22.8 lb/Mgal[2] = NO_x 6.00 lb/Mgal[2] = CO 1.20 lb/Mgal[2] = VOC HAPs	Multivane scrubber & secondary dust collectors	95%	Fuel-Wood[1] Fuel-Used Oil[2]

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
03, 04, 05	PM – NCASI 2008 Plywood VOC – NCASI TB 768, calculated as WPP1 HAPs AP-42 Section 10.5-2 and 10.5-3 and 2008 NCASI Plywood Database for indirect fired southern pine cooling section	0.109 lb/Msf@3/8"=PM 0.111 lb/Msf@3/8"=PM_{10} 0.052 lb/Msf@3/8"=CO 0.057 lb/Msf@3/8"=VOC	Incinerator	95%	
06 & 08	Based on GP developed factors, June 1995. Average plus 2 standard deviations. PM is filterable plus condensable. Calculated by NCASI using the Wood Products Protocol 1 (WPP1) methodology. 20% safety factor. NCASI Direct-Fired Kiln emission test report for IP Tuscaloosa, September 1994. NCASI technical bulletin for panel plants, March 2003.	2.2E-2 lb/Mbf = PM_{10} 1.5E-2 lb/Mbf = PM 5.74 lb/Mbf = VOC 4.4E-2 lb/Mbf = Acetone HAPs	N/A	N/A	
06a	AP-42, Section 1.4, Tables 1.4-1 and1.4-2	(lb/MMscf) 1.9 – PM 7.6 – PM10 84 – CO 5.5 – VOC 0.6 – SO2 0.0004 – Lead (lb/MMBtu) 0.06 – NOx 117.0 – GHG 117.0 – CO_2e	N/A	N/A	
	AP-42, Section 1.4, Tables 1.4-3 and 1.4-4	(lb/MMscf) 2.10E-3 – Benzene Formaldehyde – 7.50E-2 Hexane – 1.80E+0 POM – 5.18E-5 Arsenic – 2.00E-4 Beryllium – 1.20E-5 Cadmium – 1.10E-3 Manganese – 3.80E-4 Mercury – 2.60E-4			
09	[1]AP-42, Table 1.4-2 [2]Vendor Guarantee	Natural Gas Combustion 1.90 lb/MMscf[1]=PM_{10}			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
	[3]GP-Developed [4]NCASI	7.60 lb/MMscf[1]=PM 0.036 lb/MMscf[2]=NO_x 0.60 lb/MMscf[1]=SO_2 0.15 lb/MMscf[2]=CO 5.50 lb/MMscf[1]=VOC 5.00E-4 lb/MMscf[1]=lead Lumber Drying 1.50 E-2 lb/MBf[3]=PM 2.20 E-2 lb/MBf[3]=PM_{10} 5.74 lb/MBf[4]=VOC			
10	PM speciation test at GP facility.	3.00E-2 gr/dscf PM 5.7E-4 gr/dscf PM_{10}	Cyclone		1,797 dscfm
11	PM speciation test at GP facility.	2.00E-3 gr/dscf PM 1.53E-3 gr/dscf PM_{10}	Cyclone/Baghouse	99%	59,000 dscfm
12	PM tests at GP facility	4.53E-4 gr/dscf PM 1.90E-3 gr/dscf PM_{10}	Cyclone/Baghouse	99%	65,000 dscfm
13	PM tests at GP facility	4.53E-4 gr/dscf PM 1.90E-3 gr/dscf PM_{10}	Cyclone	99%	17,675 dscfm
14	PM tests at GP facility	4.53E-4 gr/dscf PM 1.90E-3 gr/dscf PM_{10}	Cyclone/Baghouse	99%	4,461 dscfm
15	PM tests at GP facility	1.41E-3 gr/dscf PM 3.80E-4 gr/dscf PM_{10}	Cyclone/Baghouse	99%	58,000 dscfm
16	PM tests at GP facility	1.41E-3 gr/dscf PM 3.80E-4 gr/dscf PM_{10}	Cyclone/Baghouse	99%	2,491 dscfm
29	PM speciation test at GP facility.	2.0 lb/hr PM 2.0 lb/hr PM_{10}	Cyclone		
33	PM tests at GP facility	4.53E-4 gr/dscf PM 1.90E-3 gr/dscf PM_{10}	Baghouse	99%	27,100 dscfm
50	PM speciation test at GP facility.	2.00E-3 gr/dscf PM 2.00E-3 gr/dscf PM_{10}	Baghouse	99%	650 dscfm
17,18, 19, 20, 21, 35 & 36	2008 NCASI Plywood database. PM is filterable and condensable (previously just filterable) VOC is based on the WPP1 calculation Test data for IP Nacogdoches OSB Mill, June 1996 NCASI technical bulletin for panel plants, March 2003.	2.89E-2 lb/MSF=PM 7.51E-2 lb/MSF=PM_{10} 4.47E-1 lb/MSF=VOC 1.03E-2 lb/MSF=Form. 3.26E-3 lb/MSF=Phenol 1.52E-2 lb/MSF=Ace. 3.58E-1 lb/MSF=Methanol			Cap.=MSF/hr 78.103 (combined) (press fans)
03&04	Natural gas factors from AP-42 Table 1.4-1 through 1.4-3	7.6 lb/MMscf=PM_{10} 1.9 lb/MMscf=PM 100 lb/MMscf=NO_x 84 lb/Mscf=CO 0.6 lb/Mscf=SO_2	N/A	N/A	Emissions based on Max. dryer cap.=57 MSF/hr.

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
22	2010 NCASI Plywood Database	0.0572 lbs/Msf@ 3/8"=PM/PM_{10}/$PM_{2.5}$ 0.097 lb/Msf@3/8"=CO 0.161 lb/Msf@3/8"=VOC			
	Stack test data 6/20/12	7.50E-2 lb/Msf@3/8"=Form. 2.19E-3 lb/Msf@3/8"=Meth.			
	2010 NCASI Plywood Database	2.73E-3 lb/Msf@3/8"=Acehd. 2.16E-3 lb/Msf@3/8=Acetne. 4.83E-4 lb/Msf@3/8=Benzene 6.17E-3 lb/Msf@3/8=Phenol			
	AP-42, Section 1.4, Tables 1.4-1 through 1.4-3 (natural gas combustion)	2.10E-3 lb/Msf@3/8"=Ben. 1.8 lb/Msf@3/8"=Hex. 6.82E-4 lb/Msf@3/8"=POM 3.4E-3 lb/Msf@3/8"=Tol. 2.0E-4 lb/Msf@3/8"=Ars. 1.2E-5 lb/Msf@3/8"=Bery. 1.1E-3 lb/Msf@3/8"=Cad. 1.4E-3 lb/Msf@3/8"=Chrom. 8.4E-5 lb/Msf@3/8"=Cob. 8.5E-4 lb/Msf@3/8"=Lead 3.8E-4 lb/Msf@3/8"=Mang. 2.6E-4 lb/Msf@3/8"=Mercury 2.1E-3 lb/Msf@3/8"=Nickel 2.4E-5 lb/Msf@3/8"=Seln.			
23	FIRE database for SCC3-07-008-03 for sawdust storage pile handling	1.0 lb/ton=PM 0.58 lb/ton=PM_{10}	N/A	N/A	
24	FIRE database for SCC 3-07-008-01 for log debarking	0.02 lb/ton logs=PM 0.011 lb/ton logs=PM_{10}			
25	AP-42 Section 13.4.2, Aggregate Handling and Storage Piles, drop equation	See application dated February 2009			
26	AP-42	See application dated February 2009			
27	EPA Tanks Program	See application dated February 2009			
28	Removed.				
30	2010 NCASI Plywood Database	9.25E-2 lb/Msf@3/8"=VOC 5.6E-3 lb/Msf=Acealdhyd 3.6E-3 lb/Msf=Acetone 6.73E-2 lb/Msf=Alpha-pinene 1.08E-2 lb/Msf-beta-pinene 8.80E-3 lb/Msf-Methanol	N/A	N/A	
31	VOC (as propane) and HAP emission factor per AP-42, Section 10.5, Plywood Manufacturing, Table 10.5-7, Softwood plywood saws	Emission Factors (lb/Msf@3/8")or (lb/ton) VOC=0.103			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
	(includes 3 saws, hog and sander). Units are lb/Msf. Includes 20% safety factor.	Acetaldehyde=1.1E-3 Acetone=2.28E-3 alpha-pinene=3.24E-2 Formaldehyde=4.08E-4 Methanol=1.44E-2			
32	Emission factors based 2008 NCASI Plywood Database for sander baghouse vent for southern pine. Includes a 20% safety factor. VOC is based on the WPP1 calculation.	Emission Factors (lb/Msf@3/8") VOC=2.27E-1 Acetaldehyde=3.31E-3 Acetone=5.67E-3 alpha-pinene=2.72E-2 Formaldehyde=2.13E-3 Methanol=1.49E-2			
34	AP-42 Table 1.4-1, 2 Table 1.5-1	NG PM/PM_{10}=7.6 lb/MMscf NO_x=50 lb/MMscf CO=84 lb/MMscf VOC=5.5 lb/MMscf SO_2=0.6 lb/MMscf Propane PM/PM_{10}=0.6 lb/1000gal NOx=19 lb/1000gal CO=3.2 lb/1000gal VOC=0.5 lb/1000gal SO_2=0.1S lb/1000gal			
37	Historical usage and product data	VOC usage rate=23.1 gal/MMSF			
		HAP Usage rate=23.08 gal MMSF			
		VOC EF (MSDS)=0.6 lb/gal			
	NESHAP DDDD	HAPs EF=0.085 lb/gal (based on paint/ink density of 8.5 lb/gal and 1.0% by mass according to NESHAP DDDD)			
38	From Appendix C-Manufacturer VOC Testing, actual VOC of Utility Release diluted 1:8 at 150F	(3.27 grams VOC/liter Oil)*(0.0022046 lb/g)*(3.785412 L/gal)=0.0273 lb/gal			
39	2003 NCASI SARA 131 Handbook Diisocyanate Compounds	VOC EF=7.7E-7 lb/gal MDI EF=7.7E-7 lb/gal			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
40	Glue Line Based on test data from GP's plywood facility in Emporia, VA in 1994	Emission Factors (lb/Msf@3/8") VOC=3.5E-3 lb/Msf@3/8" Benzene=3.0E-5 Formaldehyde=4.0E-5 Methanol=3.0E-3 Toluene=4.0E-4 Xylene=3.0E-5			
41	Based on Analytical Report for condensate samples collected on 04/27/10 at GP-Dudley Saw Mill.				
	Concentration is Total Dissolved Solids (TDS)	154.8 mg/l=PM 154.8 mg/l=PM_{10} 154.8 mg/l=$PM_{2.5}$			
	Concentration is Total Organic Carbon (TOC)	1836.0 mg/l=VOC			
51	NSPS IIII AP-42	<u>lb/hp-hr</u> PM: 3.31E-04 CO: 5.73E-05 NO_x: 4.10E-03 PM_{10}: 3.85E-04 VOC: 2.541E-03 SO_2: 2.05E-03 Total HAP: 2.62E-05			
52	AP-42 13.2.4 Aggregate Handling and Storage Piles	<u>lb/ton</u> PM: 0.00123 PM_{10}: 0.000582			

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01, 02	PM/PM_{10} NO_x VOC Exhaust Gas Volumetric flow rate HCl Mercury Filterable PM	Method 5 NO_x VOC Method 2 Method 26/26A Method 29/30A/30B Method 5	Every 5 yrs Annually. After 2 consecutive years if under 75% of emission limit, conduct performance tests every third year.	Permit# 0463-AOP-R6 Boiler MACT
22	NO_x CO VOC	Method 7E Method 10 Method 25A	Every 5 yrs	Permit# 0463-AOP-R6

15. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
01, 02	Oxygen	CEM	Continuous	Y
22	Temperature and flow rate of gases leaving the combustion zone	CEM	Continuous	Y

16. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01, 02	Wood residue, hydraulic & motor oil, glue residue (Fuel Use)	262,800 ton of wood residue 46,248 gallon of used hydraulic and motor oil 1,030 ton of glue residue	Monthly	Yes
	On specification used oil scrap glue	3.77 gallons/hr 0.095 tons/hr	Weekly	Yes
	Flue gas O_2 Concentration	Not to be less than 4% or exceed 11%	Continuous	Yes
	CO	3,500 ppmv @ 3% O_2	Monthly	Yes
06, 08	Board feet of lumber dried in any one drying kiln	172,000,000 BF/12 month period	Monthly	Yes
09	Board feet of lumber dried	130,000,000 BF/12 month period	Monthly	Yes
	VOC emission limit	3.8lb VOC/1,000 BF	Monthly	Yes
22	Firebox temperature	To be established	Continuous	Yes
23, 24	Logs processed	2,011,179 ton/12 month period	Monthly	Yes
25, 26, 29	Logs processed	2,011,179 ton/12 month period	Monthly	Yes
27	Dimensions of storage vessel	See permit Specific Condition 84	N/A	Yes
28	Antifreeze	2,411 gal/12 month period	Monthly	Yes
32	MSF (3/8” basis)	300,000	Monthly	Yes
37	VOC	4.9 ton/12 month period	Monthly	Yes
	HAPs	No countable HAPs (<0.1% for OSHA carcinogens and <1% by mass for other organic HAPS)	As Needed	No
38	VOC	17.9 ton/12 month period 3.3 g VOC/L	Monthly Monthly	Yes Yes
39	VOC	0.2 tons/12 month period	Monthly	

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
40	VOC	8.8% by wt. 0.8 tpy VOC	Monthly	No
	Formaldehyde	0.1% by wt. 0.01 tpy		
	HAPs	Varies		
48	Hours of Operation	500 hours per rolling 12-month period	Monthly	No
	Maintenance Performed	Records of required maintenance	As needed	No
49	Hours of Operation	500 hours per rolling 12-month period	Monthly	No
	Maintenance Performed	Records of required maintenance	As needed	No
51	Emergency and Non-Emergency Use	500 hr/yr	Monthly	No
Plantwide	Square feet of 3/8 equivalent plywood through plywood dryers	425,000,000 square feet/consecutive 12 month period	Monthly	Yes
	Square feet of 3/8 equivalent plywood in finish area	435,000,000 square feet/consecutive 12 month period	Monthly	Yes

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02	20%	Reg.19.501 & 40 C.F.R. § 52 Subpart E	Daily Observations
03, 04, 05	20%	Reg.19.501 & 40 C.F.R. § 52 Subpart E	Weekly Observations
10	20%	Reg.19.501 & 40 C.F.R. § 52 Subpart E	Weekly Observations
11	5%	Reg.18.801 & Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and §8-4-311	Weekly Observations
12, 13, 14	5%	Reg.18.801 & Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and §8-4-311	Weekly Observations
15, 16	5%	Reg.18.801 & Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and §8-4-311	Weekly Observations
17, 18, 19, 20, 21, 35,	20%	Reg.19.501 & 40 C.F.R. § 52 Subpart E	Weekly Observations

SN	Opacity	Justification for limit	Compliance Mechanism
36			
22	5%	Reg.18.501 & Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and §8-4-311	Weekly Observations
23, 24	20%	Reg.19.501 & 40 C.F.R. § 52 Subpart E	Weekly Observations
25	20%	Reg.19.501 & 40 C.F.R. § 52 Subpart E	Weekly Observations
26	20%	Reg.19.501 & 40 C.F.R. § 52 Subpart E	Weekly Observations
29	20%	Reg.19.501 & 40 C.F.R. § 52 Subpart E	Weekly Observations
33	5%	Reg.18.801 & Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and §8-4-311	Weekly Observations
42	20%	Reg.19.501 & 40 C.F.R. § 52 Subpart E	Weekly Observations
50	5%	Reg.18.801 & Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and §8-4-311	Weekly Observations
51	20%	§19.503 § 52 Subpart E	Inspector Observation
52	20%	19.503 and 40 C.F.R. Part 52	Weekly Observations

18. DELETED CONDITIONS:

Former SC	Justification for removal
#163-166	Removal of SN-42 Bark Shredder

19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Cat.	Emissions (tpy)						
		PM/PM_{10}	SO_2	VOC	CO	NO_x	HAPs	
							Single	Total
B-7	A-2			0.0001				0.0001
B-6	A-2			0.0001				0.0001
B-14	A-2			0.0001				0.0001
B-15	A-2			0.0001				0.0001

Source Name	Group A Cat.	Emissions (tpy)						
		PM/PM_{10}	SO_2	VOC	CO	NO_x	HAPs	
							Single	Total
B-16	A-2			0.0001				0.0001
B-23	A-2			0.0001				0.0001
B-27	A-2			0.0001				0.0001
B-28	A-2			0.0001				0.0001
B-29	A-2			0.0001				0.0001
B-30	A-2			0.0001				0.0001
B-31	A-2			0.0001				0.0001
B-32	A-2			0.0001				0.0001
B-33	A-2			0.0001				0.0001
Totals				0.0013				0.0013
Tank B-1	A-3			0.0028				0.0028
Tank B-9	A-3			0.0003				0.0003
Tank G-1	A-3			0.0001				0.0001
Tank RT-1	A-3			0.0001				0.0001
Tank B-12	A-3			0.0010				0.0010
Tank B-13	A-3			0.0005				0.0005
Tank B-3	A-3			0.0006				0.0006
Tank B-4	A-3			0.0006				0.0006
Tank B-5	A-3			0.0003				0.0003
Tank B-10	A-3			0.0010				0.0010
Tank B-11	A-3			0.0015				0.0015
Tank B-18	A-3			0.0003				0.0003
Tank B-19	A-3			0.0003				0.0003
Tank B-21	A-3			0.0015				0.0015
Tank B-22	A-3			0.0001				0.0001
Tank B-24	A-3			0.0003				0.0003

Source Name	Group A Cat.	Emissions (tpy)						
		PM/PM_{10}	SO_2	VOC	CO	NO_x	HAPs	
							Single	Total
Tank B-25	A-3			0.0002				0.0002
Tank B-26	A-3			0.0001				0.0001
Tank B-34	A-3			0.0001				0.0001
Tank B-35	A-3			0.0001				0.0001
Tank B-20	A-3			0.0001				0.0001
Tank B-2	A-3			0.483				0.483
Totals				0.4949				0.4949
Chippers	A-13	0.56						
Chip Screens	A-13	2.82						
Dry Ice – Cleaning	A-13							
Sock Filters	A-13							
Parts Washers	A-13			0.048			0.0033	0.0033
Tank B-8	A-13			0.0033			0.0058	0.0058
Tank RT1	A-13			0.0058			0.0058	0.0058
Tank RT2	A-13			0.0058			0.57	0.57
Tanks GT1 – GT7	A-13			0.57				
Stick Breaker	A-13	0.01						
Totals		3.39		0.6329			0.5849	0.5849

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0463-AOP-R16

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Georgia-Pacific Wood Products LLC
Permit Number: 0463-AOP-R17
AFIN: 10-00005

$/ton factor	23.93	Annual Chargeable Emissions (tpy)	1914.85
Permit Type	Modification	Permit Fee $	1000

Minor Modification Fee $	500
Minimum Modification Fee $	1000
Renewal with Minor Modification $	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	☐
If Hold Active Permit, Amt of Last Annual Air Permit Invoice $	0
Total Permit Fee Chargeable Emissions (tpy)	-0.9
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM: *Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

Air Contaminants: *All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		354.2	353.3	-0.9	-0.9	353.3
PM_{10}		322.8	322.8	0		
$PM_{2.5}$			0	0		
SO_2		38.7	38.7	0	0	38.7
VOC		1213.1	1213.1	0	0	1213.1
CO		1840.2	1840.2	0		
NO_X		292.4	292.4	0	0	292.4
Acetaldehyde	☐	17.24	17.24	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Acrolein	☐	1.91	1.91	0		
Benzene	☐	5.3904	5.3904	0		
1,3-Butadiene	☐	0.02	0.02	0		
Carbon disulffide	☐	0.18	0.18	0		
Chloroform	☐	0.12	0.12	0		
Formaldehyde	☐	34.49	34.49	0		
Hexachlorobenzene	☐	0.001462	0.001462	0		
Hexane	☐	1.16	1.16	0		
Methanol	☐	172.23	172.23	0		
Methylene Chloride	☑	1.48	1.48	0	0	1.48
MIBK	☐	2.44	2.44	0		
Phenol	☐	10.62	10.62	0		
POM	☐	0.1812	0.1812	0		
Propionaldehyde	☐	0.36	0.36	0		
Styrene	☐	2.98	2.98	0		
Vinyl Chloride	☐	0.04	0.04	0		
Xylene	☐	0.978	0.978	0		
Arsenic	☐	0.04103	0.04103	0		
Beryllium	☐	0.013002	0.013002	0		
Cadmium	☐	0.0272	0.0272	0		
Chromium	☐	0.06	0.06	0		
Manganese	☐	2.00106	2.00106	0		
Mercury	☐	0.01424	0.01424	0		
Phosphorus	☐	0.46	0.46	0		
Acetone	☑	15.87	15.87	0	0	15.87
Lead	☐	0.182	0.182	0		