

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0463-AOP-R24 AFIN: 10-00005

1. PERMITTING AUTHORITY:

Division 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:

Alexander Sudibjo

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
2/7/2024	Minor Mod	Increase SN-11 airflow rate

6. REVIEWER'S NOTES:

With this minor modification, the facility is installing a Splitter at the outfeed of the Planer to split dried 2x8 lumber into 2x4 lumber. Sawdust from the Splitter will be collected by the existing Planer Shavings Conveying System (SN-11). As a result, the system airflow rate will be increased to 68,000 dscfm. There will be no changes to the flow rate of the sawdust baghouse (SN-50). The facility's permitted annual emissions are increasing by 0.7 tpy PM and 0.5 tpy PM<sub>10</sub>.

7. COMPLIANCE STATUS:

As of February 7, 2024, there are no compliance issues with the facility. ECHO (<https://echo.epa.gov/detailed-facility-report?fid=110017425071>) shows no air violation identified as of May 15, 2023.

8. PSD/GHG APPLICABILITY:

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

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. The emission increases from this modification are below the significant emission rates.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
01 and 02	PM <sub>10</sub> , VOC, CO, NO <sub>x</sub>	PSD
01 and 02	HCl, Mercury, PM, CO	NESHAP DDDDD, Boiler MACT
03, 04, 05, 06, 53	HAPs	NESHAP DDDD
07 and 08	VOC, PM	PSD
09	VOC	PSD
37	VOC	NESHAP DDDD
48 and 49	HAPs	NESHAP ZZZZ
51	HAPs	NSPS III

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
N/A				

11. 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 Rule 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit?

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		

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
N/A		

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. 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 DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Acetaldehyde <sup>1</sup>	46.0	5.06	5.04	Y
Acetone <sup>1</sup>	593.05	65.24	9.81	Y
Acrolein	0.25	0.0275	0.56	N
Dinitro-2-methylphenol-4,6	0.2	0.022	6.80E-04	Y

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Dinitrotoluene-2,4	0.2	0.022	3.05E-04	Y
Formaldehyde <sup>1</sup>	1.5	0.165	8.37	N
Hydrogen Chloride <sup>1</sup>	3.0	0.33	5.94	N
Methanol <sup>1</sup>	260.0	28.6	51.61	N
Pentachlorophenol	0.5	0.055	6.39E-05	Y
Phenol <sup>1</sup>	19.0	2.09	2.70	N
Polycyclic Organic Matter (POM)	0.2	0.022	0.06	N
Antimony	0.5	0.055	7.75E-04	Y
Arsenic	0.01	0.0011	7.01E-03	N
Beryllium	0.002	2.20E-04	3.0E-03	N
Cadmium	0.01	0.0011	5.07E-03	N
Chromium	0.5	0.055	4.04E-03	Y
Chromium VI	0.05	0.0055	1.00E-02	N
Cobalt	0.02	0.0022	2.08E-04	Y
Lead	0.1	0.011	4.00E-2	N
Manganese	0.02	0.0022	6.01E-01	N
Mercury	0.025	0.00275	1.16E-02	N
Phosphorus	0.1	0.011	1.20E-01	N
Selenium	0.2	0.022	3.36E-04	Y
Dinitrophenol-2,4 <sup>2</sup>	0.002	2.20E-04	8.91E-05	Y
Nitrophenol-4 <sup>2</sup>	0.001	1.10E-04	6.24E-05	Y
MDI	0.052	5.63E-03	6.01E-06	Y

<sup>1</sup>These pollutants were evaluated because annual emissions are greater than 10 tpy for each pollutant.

<sup>2</sup>No TLV is available. A Conservative health based ambient air concentration for Dinitrophenol-2,4 and Nitrophenol-4 was obtained from the U.S. EPA Integrated Risk Information System (IRIS) database and the Effect Screening Level (ESL) by the Texas Commission on Environmental Quality (TCEQ).

2<sup>nd</sup> 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 Division of Environmental Quality to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

All modeling was performed using H1H, 1-year (2016) meteorological data.

Pollutant	PAIL ( $\mu\text{g}/\text{m}^3$ ) = 1/100 of Threshold Limit Value	Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	Pass?
Acrolein	2.5	1.35	Y
Formaldehyde	15.0	10.5415	Y
Hydrogen Chloride	30.0	6.4954	Y
Methanol	2,600.0	176.01143	Y
Phenol	190.0	6.2867	Y
POM	2.0	0.06737	Y
Arsenic	0.1	0.00706	Y
Beryllium	0.02	0.00285	Y
Cadmium	0.1	0.00497	Y
Chromium VI	0.5	0.01094	Y
Lead	1.0	0.04257	Y
Manganese	0.2	0.04567	Y
Mercury	0.25	0.01054	Y
Phosphorus	1.0	0.1313	Y

c) H<sub>2</sub>S 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<sub>2</sub>S Standards

Y

If exempt, explain: the facility does not have H<sub>2</sub>S emissions.

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
01 & 02	<p>PM- Stack test data                      PM<sub>10</sub>- NCASI TB1013                      NO<sub>x</sub>-                      28.5lb/hr÷135MMBtu/hr                      CO- Stack test data                      VOC- NCASI TB1013                      SO<sub>2</sub>- NCASI TB1013</p> <p>AP-42, Section 1.11</p> <p>HAPs- NCASI TB 1050</p>	<p>0.143 lb/MMBtu<sup>1</sup> = PM                      0.161 lb/MMBtu<sup>1</sup> = PM<sub>10</sub>                      0.211 lb/MMBtu<sup>1</sup> = NO<sub>x</sub>                      0.780 lb/MMBtu<sup>1</sup> = CO                      0.006 lb/MMBtu<sup>1</sup> = VOC                      0.0038 lb/MMBtu<sup>1</sup> = SO<sub>2</sub></p> <p>2.50 lb/Mgal<sup>2</sup> = PM                      1.99 lb/Mgal<sup>2</sup> = PM<sub>10</sub>                      88.2 lb/Mgal<sup>2</sup> = SO<sub>2</sub>                      22.8 lb/Mgal<sup>2</sup> = NO<sub>x</sub>                      6.00 lb/Mgal<sup>2</sup> = CO                      1.20 lb/Mgal<sup>2</sup> = VOC</p>	Multivane scrubber & secondary dust collectors	95%	<p>Fuel-Wood<sup>1</sup></p> <p>Fuel-Used Oil<sup>2</sup></p>
03, 04, 05	<p>PM - Testing</p> <p>NCASI Wood Products Database Feb. 2013 for Veneer Cooler</p> <p>HAPs AP-42 Section 10.5-2 and 10.5-3 and 2008 NCASI Wood Products Database Feb. 2013 for Veneer Cooler</p>	<p>0.110 lb/Msf@3/8"=PM                      0.112 lb/Msf@3/8"=PM<sub>10</sub>                      0.052 lb/Msf@3/8"=CO                      0.06 lb/Msf@3/8"=VOC</p>	Incinerator	95%	
06 & 08	<p>Based on GP developed factors, June 1995. Average plus 2 standard deviations. PM is filterable plus condensable.</p> <p>Calculated by NCASI using the Wood Products Protocol 1 (WPP1) methodology. 20% safety factor.</p> <p>NCASI Direct-Fired Kiln emission test report for IP Tuscaloosa, September 1994.</p> <p>NCASI technical</p>	<p>2.2E-2 lb/Mbf = PM<sub>10</sub>                      1.5E-2 lb/Mbf = PM</p> <p>5.35 lb/Mbf = VOC</p> <p>4.44E-2 lb/Mbf = Acetone</p> <p>HAPs</p>	N/A	N/A	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
	bulletin for panel plants, March 2003.				
06a	AP-42, Section 1.4, Tables 1.4-1 and 1.4-2	(lb/MMscf) 1.9 – PM 7.6 – PM10 84 – CO 5.5 – VOC 0.6 – SO2 0.0005 – Lead (lb/MMBtu) 0.06 – NOx 117.0 – GHG 117.1 – CO <sub>2c</sub>	N/A	N/A	
	AP-42, Section 1.4, Tables 1.4-3 and 1.4-4	(lb/MMscf) Formaldehyde – 7.50E-2 POM – 6.62E-4 Arsenic – 2.00E-4 Beryllium – 1.20E-5 Cadmium – 1.10E-3 Manganese – 3.80E-4 Mercury – 2.60E-4			
09	<sup>1</sup> AP-42, Table 1.4-2 <sup>2</sup> Vendor Guarantee <sup>3</sup> GP-Developed <sup>4</sup> BACT <sup>5</sup> NCASI	Natural Gas Combustion 1.90 lb/MMscf <sup>1</sup> =PM <sub>10</sub> 7.60 lb/MMscf <sup>1</sup> =PM 0.036 lb/MMscf <sup>2</sup> =NO <sub>x</sub> 0.60 lb/MMscf <sup>1</sup> =SO <sub>2</sub> 0.15 lb/MMscf <sup>2</sup> =CO 5.50 lb/MMscf <sup>1</sup> =VOC 5.00E-4 lb/MMscf <sup>1</sup> =lead  Lumber Drying 1.50 E-2 lb/MBf <sup>3</sup> =PM 2.20 E-2 lb/MBf <sup>3</sup> =PM <sub>10</sub> 3.80 lb/MBf <sup>4</sup> =VOC as Carbon 5.75 lb/MBf <sup>5</sup> = VOC as WPP1			
10	PM speciation test at GP facility.	3.00E-2 gr/dscf PM 5.7E-4 gr/dscf PM <sub>10</sub>	Cyclone		1,797 dscfm
11	PM speciation test at GP facility.	2.00E-3 gr/dscf PM 1.53E-3 gr/dscf PM <sub>10</sub>	Cyclone/Baghouse	99%	68,000 dscfm
12	PM tests at GP facility	4.53E-4 gr/dscf PM 1.90E-3 gr/dscf PM <sub>10</sub>	Cyclone/Baghouse	99%	65,000 dscfm
13	PM tests at GP facility	4.53E-4 gr/dscf PM 1.90E-3 gr/dscf PM <sub>10</sub>	Cyclone	99%	17,675 dscfm
14	PM tests at GP facility	4.53E-4 gr/dscf PM 1.90E-3 gr/dscf PM <sub>10</sub>	Cyclone/Baghouse	99%	4,461 dscfm
15	PM tests at GP facility	1.41E-3 gr/dscf PM 3.80E-4 gr/dscf PM <sub>10</sub>	Cyclone/Baghouse	99%	58,000 dscfm
16	PM tests at GP facility	1.41E-3 gr/dscf PM 3.80E-4 gr/dscf PM <sub>10</sub>	Cyclone/Baghouse	99%	2,491 dscfm

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
33	PM tests at GP facility	4.53E-4 gr/dscf PM 1.90E-3 gr/dscf PM <sub>10</sub>	Baghouse	99%	27,100 dscfm
50	PM speciation test at GP facility.	2.00E-3 gr/dscf PM 2.00E-3 gr/dscf PM <sub>10</sub>	Baghouse	99%	650 dscfm
17,18, 19, 20, 21, 35 & 36	PM – Stack Testing  VOC is based on the WPP1 calculation  NCASI Wood Products Database Feb. 2013	2.89E-2 lb/MSF=PM 6.15E-2 lb/MSF=PM <sub>10</sub>  3.93E-1 lb/MSF=VOC as Carbon 5.31E-1 lb/Msf as WPP1  2.68E-3 lb/MSF Formaldehyde 3.74E-3 lb/MSF Phenol 4.33E-3 lb/MSF Acetaldehyde 7.26E-2 lb/MSF Methanol 6.37E-3 lb/MSF Acetone			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 <sub>10</sub> 1.9 lb/MMscf=PM 100 lb/MMscf=NO <sub>x</sub> 84 lb/Mscf=CO 0.6 lb/Mscf=SO <sub>2</sub>	N/A	N/A	Emissions based on Max fuel use of 0.023 MMscf/hr
22	2010 NCASI Plywood Database	0.0572 lbs/Msf@ 3/8”=PM/PM <sub>10</sub> /PM <sub>2.5</sub> 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. 3.94E-3 lb/Msf@3/8”=Meth.			
	2013 NCASI Plywood Database	2.73E-3 lb/Msf@3/8”=Acehd. 2.16E-3 lb/Msf@3/8”=Acetne. 6.88E-3 lb/Msf@3/8”=Phenol			
	AP-42, Section 1.4, Tables 1.4-1 through 1.4-3 (natural gas combustion)	6.82E-4 lb/Msf@3/8”=POM 2.0E-4 lb/Msf@3/8”=Ars. 1.2E-5 lb/Msf@3/8”=Bery. 1.1E-3 lb/Msf@3/8”=Cad. 8.5E-4 lb/Msf@3/8”=Lead 3.8E-4 lb/Msf@3/8”=Mang. 2.6E-4 lb/Msf@3/8”=Mercury			
23	FIRE database for SCC3-07-008-03 for sawdust storage pile handling	1.0 lb/ton=PM 0.36 lb/ton=PM <sub>10</sub>	N/A	N/A	
24	NCASI and PMCALC	2.84E-3 lb/ton logs=PM/ PM <sub>10</sub>			
25	AP-42 Section 13.4.2, Aggregate Handling	E = k*0.0032*((U/5) <sup>1.3</sup> )/((M/2) <sup>1.4</sup> )			



SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip.	Control Equip. Eff.	Comments
	and Storage Piles, drop equation	k = 0.74 PM k = 0.35 PM <sub>10</sub> U=7.2 mph			
26	AP-42 Chapter 13	E = k (s/12)a (W/3)b PM: k=0.15, a=0.9, b=0.45, s=8.4 PM <sub>10</sub> : k=1.5, a=0.9, b=0.45, s=8.4	Watering unpaved road	90%	Wet deck area has continuous water spray
30	2013 NCASI Plywood Database	8.58E-2 lb/Msf@3/8"=VOC as WPP1  5.6E-3 lb/Msf=Acetaldehyd 3.6E-3 lb/Msf=Acetone 8.80E-3 lb/Msf-Methanol	N/A	N/A	
31	NCASI Wood Products Database Feb. 2013	Emission Factors (lb/Msf@3/8")or (lb/ton)  VOC=0.1103 Acetaldehyde=6.70E-4 Acetone=2.25E-3 Methanol=8.19E-3			
32	NCASI Wood Products Database Feb. 2013  VOC is based on the WPP1 calculation.	Emission Factors (lb/Msf@3/8")  VOC=2.19E-1 Acetaldehyde=2.12E-3 Acetone=5.67E-3 Formaldehyde=1.46E-3 Methanol=9.27E-3			
37	Historical usage and product data	Paint usage rate= 37 gal/MMSF  VOC EF (MSDS)=0.6 lb/gal Acetone EF=0.6 lb/gal			Board throughput 78.1 MSF/hr 435,000 MSF/yr 2920 hr/yr
	NESHAP DDDD	8.34 lb/gal max 1% by mass			
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	Manufacturer VOC Testing	PM EF= 39 lb/hr = 170 tpy VOC EF=7.70E-07lb/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"  Formaldehyde=4.0E-5 Methanol=3.0E-3 Acetone=1.61E-3			
48, 49	AP-42 Chapter 3.3	<u>lb/hp-hr</u> PM/PM <sub>10</sub> : 2.2E-3 SO <sub>2</sub> : 2.05E-3 NO <sub>x</sub> : 3.1E-2 CO: 6.68E-3 VOC: 2.51E-3  <u>lb/MMBtu</u> Formaldehyde: 1.18E-3 Acetaldehyde: 7.67E-4 Acrolein: 9.25E-5			500 hr/yr, each
51	NSPS III  AP-42	<u>lb/hp-hr</u> PM: 3.31E-04 CO: 5.73E-05 NO <sub>x</sub> : 4.10E-03  PM <sub>10</sub> : 3.85E-04 VOC: 2.51E-03 SO <sub>2</sub> : 2.05E-03 Acetaldehyde: 5.37E-6 Formaldehyde: 8.26E-6			500 hr/yr
52	AP-42 13.2.4 Aggregate Handling and Storage Piles	<u>lb/ton</u> PM: 0.001117 PM <sub>10</sub> : 0.000528			
53	SDS, Mass Balance	<u>Black Ink (LS-4101)</u> Density: 9.17 lb/gal VOC wt. %: 10  <u>Black Ink (SCP-901A)</u> Density: 6.87 lb/gal Acetone wt. %: 100			Max. Hourly Throughput: 78 Msf/hr Max. Annual Throughput: 435,000 Msf/yr

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01, 02	PM/PM <sub>10</sub> NO <sub>x</sub> VOC Exhaust Gas Volumetric flow rate  HCl Mercury Filterable PM	Method 5 NO <sub>x</sub> 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 <sub>x</sub> CO VOC	Method 7E Method 10 Method 25A	Every 5 yrs	Permit# 0463-AOP-R6

17. 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

18. 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,	262,800 ton of wood residue	Monthly	Yes

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	glue residue (Fuel Use)	46,248 gallon of used hydraulic and motor oil  1,276 ton of glue residue		
	On specification used oil	3.77 gallons/hr  0.095 tons/hr	Weekly	Yes
	scrap glue Flue gas O <sub>2</sub> Concentration	Not to be less than 4% or exceed 11%	Continuous	Yes
	CO	3,500 ppmv @ 3% O <sub>2</sub>	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	160,000,000 BF/12 month period	Monthly	Yes
	VOC emission limit	3.8lb VOC/1,000 BF	Monthly	Yes
22	Firebox temperature	1,100 °F	Continuous	Yes
23, 24	Logs processed	2,248,650 ton/12 month period	Monthly	Yes
25, 26	Logs processed	2,248,650 ton/12 month period	Monthly	Yes
32	MSF (3/8" basis)	300,000	Monthly	Yes
37	VOC	4.9 ton/12 month period	Monthly	Yes
	Acetone	4.90 ton/12 month period	Monthly	Yes
	HAPs that are below 0.1% by mass for OSHA defined carcinogens and less than 1% by mass for other organic HAP compounds	0.54 ton/12 month period	Monthly	Yes
	Only use non-HAP coating	Non-HAP coating: coating with <0.1% for OSHA	As Needed	No

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		carcinogens and <1% by mass for other organic HAPS		
38	VOC	17.9 ton/12 month period	Monthly	Yes
		3.3 g VOC/L	Monthly	Yes
39	VOC	0.2 tons/12 month period	Monthly	
	HAP	0.1 tons/12 month period	Monthly	
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
53	VOC	0.05 tons/12 month period	Monthly	Yes
	Acetone	4.51 tons/12 month period	Monthly	Yes
	Countable HAPs	Less than 0.1% for OSHA defined carcinogens and less than 1% by mass for other organic HAP compounds	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

## 19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02	20%	Rule 19.503 & 40 C.F.R. § 52 Subpart E	Daily Observations
03, 04, 05	20%	Rule 19.503 & 40 C.F.R. § 52 Subpart E	Weekly Observations
10	20%	Rule 19.503 & 40 C.F.R. § 52 Subpart E	Weekly Observations
11	5%	Rule 18.501 & 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%	Rule 18.501 & Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and §8-4-311	Weekly Observations
15, 16	5%	Rule 18.501 & 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, 36	20%	Rule 19.503 & 40 C.F.R. § 52 Subpart E	Weekly Observations
22	5%	Rule 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%	Rule 19.503 & 40 C.F.R. § 52 Subpart E	Weekly Observations
25	20%	Rule 19.503 & 40 C.F.R. § 52 Subpart E	Weekly Observations
26	20%	Rule 19.503 & 40 C.F.R. § 52 Subpart E	Weekly Observations
29	Removed		
33	5%	Rule 18.501 & Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and §8-4-311	Weekly Observations
39	20%	Rule 19.503 & 40 C.F.R. § 52 Subpart E	Inspector Observation
50	5%	Rule 18.501 & Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and §8-4-311	Weekly Observations
51	20%	Rule 19.503 & 40 C.F.R. § 52 Subpart E	Inspector Observation
52	20%	Rule 19.503 & 40 C.F.R. § 52 Subpart E	Weekly Observations

20. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

21. 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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
B-7	A-2			5.7E-05				5.7E-05
B-6	A-2			4.0E-05				4.0E-05
B-14	A-2			5.0E-05				5.0E-05
B-15	A-2			5.0E-05				5.0E-05
B-16	A-2			5.0E-05				5.0E-05
B-23	A-2			5.0E-05				5.0E-05
B-27	A-2			2.0E-05				2.0E-05
B-28	A-2			3.3E-05				3.3E-05
B-29	A-2			3.3E-05				3.3E-05
B-30	A-2			2.0E-05				2.0E-05
B-31	A-2			2.0E-05				2.0E-05
B-32	A-2			2.0E-05				2.0E-05
B-33	A-2			2.0E-05				2.0E-05
B-38	A-2			3.2E-05				3.2E-05
A-2 Totals				4.95E-4				4.95E-4
Tank B-1	A-3			2.3E-03				2.3E-03
Tank B-9	A-3			2.3E-04				2.3E-04
Tank G-1	A-3			9.0E-05				9.0E-05
Tank G-2	A-3			1.1E-04				1.1E-04
Tank RT3	A-3			1.1E-04				1.1E-04

Source Name	Group A Cat.	Emissions (tpy)						
		PM/ PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Tank B-3	A-3			4.0E-04				4.0E-04
Tank B-4	A-3			4.0E-04				4.0E-04
Tank B-5	A-3			4.0E-04				4.0E-04
Tank B-10	A-3			6.0E-04				6.0E-04
Tank B-18	A-3			2.0E-04				2.0E-04
Tank B-19	A-3			2.0E-04				2.0E-04
Tank B-21	A-3			9.9E-04				9.9E-04
Tank B-22	A-3			5.7E-05				5.7E-05
Tank B-24	A-3			2.0E-04				2.0E-04
Tank B-35	A-3			1.0E-04				1.0E-04
Tank B-36	A-3			5.6E-05				5.6E-05
Tank B-37	A-3			9.0E-04				9.0E-04
Tank B-20	A-3			9.9E-05				9.9E-05
Tank B-2	A-3			1.6E-01				1.6E-01
A-3 Totals				1.68E-01				1.68E-01
Chippers	A-13	1.05						
Chip Screens	A-13	0.70						
Dry Ice – Cleaning	A-13							
Sock Filters	A-13	0.37						
Parts Washers	A-13			0.056				
Mold Inhibitor	A-13			4.02			0.00014	0.00014
Tank B-8	A-13			0.0027			0.0027	0.0027
Tank RT1	A-13			0.075			0.075	0.075
Tank RT2	A-13			0.075			0.075	0.075
Tanks GT1 – GT7	A-13			0.501			0.487	0.501
Stick Breaker	A-13	0.0064						



Source Name	Group A Cat.	Emissions (tpy)						
		PM/ PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Wood Fuel Storage Pile	A-13	1.48						
A-13 Totals		3.6064		4.7297			0.63984	0.65384

22. 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-R23



## 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-R24  
 AFIN: 10-00005

\$/ton factor	28.14	Annual Chargeable Emissions (tpy)	2032.23
Permit Type	Minor Mod	Permit Fee \$	500

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	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	0.7
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 condensable 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		345	345.7	0.7	0.7	345.7
PM <sub>10</sub>		314.9	315.4	0.5		
PM <sub>2.5</sub>		0	0	0		
SO <sub>2</sub>		38.7	38.7	0	0	38.7
VOC		1300.95	1300.95	0	0	1300.95
CO		1840.2	1840.2	0		
NO <sub>x</sub>		292.7	292.7	0	0	292.7
Lead	<input type="checkbox"/>	0.183	0.183	0		

