STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1803-AOP-R28 AFIN: 07-00212

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Georgia-Pacific Wood Products LLC - Fordyce, Arkansas OSB Plant
PO Box 1095
#1 Georgia-Pacific Drive
Fordyce, Arkansas 71742

3. PERMIT WRITER:

Paula Parker

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Reconstituted Wood Product Manufacturing
NAICS Code: 321219

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
11/19/2025	Minor Mod	Replace two existing 30 MMBtu/hr natural gas-fired burners (SN-01A) in the Thermal Oil System with two new 30 MMBtu/hr natural gas-fired burners.

6. REVIEWER'S NOTES:

Georgia-Pacific Wood Products LLC (Fordyce OSB) operates a facility located at #1 Georgia-Pacific Road, Calhoun County, Fordyce, AR 71742. This application was submitted as a minor modification to Permit No. 1803-AOP-R27 to replace two existing 30 MMBtu/hr natural gas-fired burners (SN-01A) in the Thermal Oil System that are worn beyond repair with two new 30 MMBtu/hr natural gas-fired burners. Neither the

wood-fired burners in the Thermal Oil System nor the Oriented Strandboard Press (SN-02) will be modified as part of this project. Permitted emissions are unchanged as a result of the burner replacement.

7. COMPLIANCE STATUS:

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

There were no issues identified in the last inspection, nor any open or pending CAOs.

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? N/A

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.

Emissions for the replacement burners are below SER.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	PM/PM_{10}, VOC, CO and NO_X	PSD
Facility	HAPs	NESHAP DDDD
15	HAPs	NESHAP QQQQ
17, 18, 19, 21	HAPs	NESHAP ZZZZ
18, 21	-	NSPS JJJJ
01A	-	NESHAP DDDDD
01A	-	NSPS Dc

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
None				

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 8 CAR pt. 40 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N/A
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
SN-01 SN-01A	NSPS Db	These combustion units have heat input ratings less than 100 MMBtu/hr.
SN-17 SN-19	NSPS IIII	These engines were constructed before the applicable dates (April 1, 2006 and July 1, 2006 respectively).
Tanks	NSPS Kb	None of the tanks storing volatile organic liquids at Fordyce OSB have a capacity greater than 19,813 gallons.
Resin/wax tanks	NESHAP EEEE	The resin/wax storage tanks are part of the affected source under PCWP MACT and not subject to NESHAP EEEE per 40 C.F.R. § 63.2338(c)(1)

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
SN-01	VOC	This is a Post 11/15/1990 NSPS or NESHAP emission limitation or standard that applies to this source and pollutant – 40 C.F.R. § 64.2(b)(1)(i)

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:

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).

Pollutant*	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Lead	0.05	0.006	0.03	N
Acetone	1187.12	130.5832	3.66	Y
Ammonia	17.41	1.915	2.97	N
Acetaldehyde	45.04	4.9544	8.08	N
Acrolein	0.23	0.0253	1.95	N
Formaldehyde	0.369	0.041	5.14	N
Methanol	262.09	28.8299	20.54	Y
Pentachlorophenol	0.5	0.055	7.20E-06	Y
Phenol	19.25	2.1175	3.05	N
Vinyl Acetate	35.21	3.8731	1.13	Y
m-Xylene	0.1	0.011	0.11	N
Antimony	0.5	0.055	1.49E-03	Y
Arsenic	0.01	0.0011	2.46E-03	N
Beryllium	5.0E-05	5.50E-06	1.09E-05	N
Cadmium	0.002	2.20E-04	1.47E-03	N
Chromium VI	0.05	5.50E-03	2.24E-03	Y

Pollutant*	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Chromium (total)	0.01	1.10E-03	2.10E-02	N
Cobalt	0.02	2.20E-03	1.09E-03	Y
Hydrogen Fluoride	0.409	0.045	0.06	N
Manganese	0.02	2.20E-03	0.37	N
Mercury	0.025	2.75E-03	4.24E-04	Y
Nickel	0.1	0.011	2.02E-02	N
Selenium	0.2	0.022	4.40E-04	Y

* Chlorine and hydrochloric acid are not evaluated because they have TLV > 1.0 mg/m^3 and annual emissions < 10 tpy.

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.

Emissions from emergency sources are not included in the model. The modeling presented was performed in previous revisions because this revision had no changes.

Pollutant	PAIL ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Lead	0.5	9.90E-04	Y
Ammonia	174.13	56.77	Y
Acetaldehyde	450.41	25.89	Y
Acrolein	2.3	0.178	Y
Formaldehyde	15	14.37	Y
Phenol	192.5	0.502	Y
m-Xylene	1.0	0.0105	Y
Arsenic	0.1	2.30E-04	Y

Pollutant	PAIL (µg/m^3) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m^3)	Pass?
Beryllium	5.0E-04	1.00E-05	Y
Cadmium	0.02	1.50E-04	Y
Chromium (total)	0.1	1.12E-03	Y
Hydrogen Fluoride	4.09	5.48E-03	Y
Manganese	2.0	0.035	Y
Nickel	1.0	1.52E-03	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
If exempt, explain: No H2S

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01 OSB 5 Dryers	Stack Testing (March 2008 and Feb 2013)	in lb/ODT PM (fil): 0.40 PM (con): 0.37 PM_{10}: 0.77 NOx: 0.83 CO: 0.49 VOC: 0.20	3 RTOs & multiclones	85% (PM/PM_{10}) 90% (VOC) 40% (CO) 90% (HAPs)	Production 695,009 ODT/yr 79.34 ODT/hr Dryer (Wood) 1,752,000 MMBtu/yr 200 MMBtu/hr Dryer (NG) 1,718 MMscf/yr 0.196 MMscf/hr TOH (Wood) 700,800 MMBtu/yr 80 MMBtu/hr TOH (NG)
	NCASI Wood Products (Feb 2013)	SO_2: 1.9e-2 lb/ODT Lead: 7.16e-5 lb/ODT Various HAPs			
01 Natural Gas Emissions	AP-42, 1.4	SO_2: 0.72 lb/MMscf Lead: 6.0e-4 lb/MMscf Various HAPs			
01 Wood Residuals	AP-42, 1.6	Lead: 5.76e-5 lb/MMBtu Various HAPs			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
					515 MMscf/yr 0.059 MMscf/hr <u>RTO (NG)</u> 412 MMscf/yr 4.7E-2 MMscf/hr 20% Safety Factor
01A	AP-42, 1.4	<u>in lb/MMscf</u> PM (fil): 2.28 PM (con): 6.84 PM_{10}: 9.12 NOx: 120 CO: 100.8 SO_2: 0.72 VOC: 6.6 Lead 6.0E-04 Various HAPs	None	N/A	<u>Natural Gas</u> 515 MMscf/yr 5.88e-2 MMscf/hr 20% Safety Factor
02 OSB Press	<u>Uncaptured</u> Stack Testing (2008, 2013, 2018) NCASI Wood Products (Feb 2013)	<u>in lb/MSF</u> PM (fil): 2.81E-01 PM (con): 2.76E-01 $PM_{10}/PM_{2.5}$: 5.57E-01 CO: 1.80E-01 NOx: 1.30E-01 VOC: 1.15 Various HAPs	Multiclones RTO/TCO	75% (PM) 90% (VOC) 75% (CO) 95% capture efficiency	600,000 MSF/yr 90 MSF/hr 103 MMscf/yr 0.0118 MMscf/hr 20% Safety Factor
	<u>Captured</u> Stack Testing (2008, 2013, 2018) NCASI Wood Products (Feb 2013)	<u>in lb/MSF</u> PM (fil): 3.30E-02 PM (con): 5.24E-02 $PM_{10}/PM_{2.5}$: 8.53E-02 CO: 7.89E-02 NOx: 6.73E-02 VOC: 4.58E-02 Various HAPs			
02 RTO (Natural Gas)	AP-42, 1.4	<u>in lb/MMscf</u> SO_2: 0.72 Lead: 6.0E-04 Various HAPs			103 MMscf/yr 0.012 MMscf/hr
02 OSB	Manufacturer's	Force Field component MSDS		95.21%	20 MMSF

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Press	Info			(VOC)	production
03	Manufacturer's Info + Mass Balance	PM (fil): 2.64 lb/hr, 11.6 tpy PM_{10}: 1.47 lb/hr, 6.5 tpy $PM_{2.5}$: 0.18 lb/hr, 0.8 tpy	High Efficiency Cyclone	99.99% for PM 96.64% for PM_{10}	600,000 MSF/yr 90 MSF/hr 13,623 dscfm 20% Safety Factor 23.400 lb/hr wood residual
	Wood Products Protocol 1 (WPP1)	VOC: 7.40E-02 lb/MSF			
	NCASI Wood Products (Feb 2013)	<u>in lb/MSF</u> Acetone: 1.18E-03 Formaldehyde: 3.61E-04 Methanol: 1.37E-03			
04	Stack Testing (2005 & 2018)	PM (fil): 1.50E-03 gr/dscf PM (con): 1.10E-03 gr/dscf	Receiver Bag Filter	80.00% for PM/PM_{10} 99.83% for PM/PM_{10}	600,000 MSF/yr 90 MSF/hr 24,084 dscfm 20% Safety Factor
	Wood Products Protocol 1 (WPP1)	VOC: 7.27E-02 lb/MSF			
	NCASI Wood Products (Feb 2013)	<u>in lb/MSF</u> Acetone: 1.18E-03 Formaldehyde: 3.61E-04 Methanol: 1.37E-03			
05	Stack Testing (2005 & 2018)	PM (fil): 2.10E-03 gr/dscf PM (con): 9.00E-04 gr/dscf	Receiver Bag Filter	80.00% for PM/PM_{10} 99.83% for PM/PM_{10}	600,000 MSF/yr 90 MSF/hr 33,800 dscfm 20% Safety Factor
	Wood Products Protocol 1 (WPP1)	VOC: 7.40E-02 lb/MSF			
	NCASI Wood Products (Feb 2013)	<u>in lb/MSF</u> Acetone: 1.18E-03 Formaldehyde: 3.61E-04 Methanol: 1.37E-03			
06	Stack Testing (2005 & 2018)	PM (fil): 3.00E-03 gr/dscf PM (con): 1.90E-03 gr/dscf	Receiver Bag Filter	80.00% for PM/PM_{10} 99.88% for PM/PM_{10}	600,000 MSF/yr 90 MSF/hr 15,175 dscfm 20% Safety Factor
	Wood Products Protocol 1 (WPP1)	VOC: 7.40E-02 lb/MSF			
	NCASI Wood	<u>in lb/MSF</u>			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	Products (Feb 2013)	Acetone: 1.18E-03 Formaldehyde: 3.61E-04 Methanol: 1.37E-03			
07	Stack Testing (2005)	PM (fil): 8.50E-03 gr/dscf	Receiver Bag Filter	80.00% for PM/PM_{10} 99.96% for PM/PM_{10}	600,000 MSF/yr 90 MSF/hr 835 dscfm 20% Safety Factor
	Wood Products Protocol 1 (WPP1)	VOC: 7.27E-02 lb/MSF			
	NCASI Wood Products (Feb 2013)	<u>in lb/MSF</u> Acetone: 1.18E-03 Formaldehyde: 3.61E-04 Methanol: 1.37E-03			
08	Stack Testing (2005)	PM (fil): 5.30E-03 gr/dscf	Receiver Bag Filter	80.00% for PM/PM_{10} 99.46% for PM/PM_{10}	695,009 ODT/yr 79.4 ODT/hr 600,000 MSF/yr 90 MSF/hr 14,248 dscfm 20% Safety Factor
	Wood Products Protocol 1 (WPP1)	VOC: 10.27 lb/hr VOC: 34.4 tpy			
	NCASI Wood Products (Feb 2013)	PM (con): 4.70E-03 lb/ODT Various HAPs			
09	Stack Testing (2005 & 2018)	PM (fil): 3.20E-03 gr/dscf PM (con): 1.20E-03 gr/dscf	Receiver Bag Filter	80.00% for PM/PM_{10} 99.96% for PM/PM_{10}	600,000 MSF/yr 90 MSF/hr 13,623 dscfm 20% Safety Factor
	Wood Products Protocol 1 (WPP1)	VOC: 7.27E-02 lb/MSF			
	NCASI Wood Products (Feb 2013)	<u>in lb/MSF</u> Acetone: 1.18E-03 Formaldehyde: 3.61E-04 Methanol: 1.37E-03			
10	<u>Debarker</u> NCASI July 2014 memo for $PM_{2.5}$ and EPA's PM Augmentation Tool	PM: 2.84E-04 lb/ton PM_{10}: 1.65E-04 lb/ton (58% of PM) $PM_{2.5}$: 5.40E-05 lb/ton (19% of PM)	None	N/A	1,178,220 ton logs/yr 135 ton logs/hr
	<u>Bark Hog</u>	PM: 0.024 lb/ton	None	N/A	117,822 ton

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)			Control Equipment	Control Equipment Efficiency	Comments
	FIRE database, SCC Code 3-07-008-01	PM_{10}: 0.011 lb/ton					bark/yr 13.5 ton bark/hr
11 Inside Spray Booth	Technical Data Sheets	PM/PM_{10}: 2.75E-02 lb/gal VOC: 3.10E-01 lb/gal Ammonia: 8.50E-02 lb/gal			Filter/ Enclosure	98%	85,324 gal/yr 0.18 gal/MSF 8.5 lb/gal 54% solids content 70% sprayer efficiency 20% Safety Factor
11 Outside Spray Booth	Technical Data Sheets	PM/PM_{10}: 5.61E-01 lb/gal VOC: 3.10E-01 lb/gal Ammonia: 8.50E-02 lb/gal			Filter/ Enclosure	75%	7,833gal/yr 0.018 gal/MSF 8.5 lb/gal 66% solids content 60% sprayer efficiency 20% Safety Factor
11 Stencil Application	Mass Balance	Ink density: 6.87 lb/gal Cleaner density: 6.59 lb/gal 100% acetone content 1% VOC/HAP content					<u>Ink usage rate</u> 0.092 gal/hr 806 gal/yr <u>Cleaner usage rate</u> 0.023 gal/hr 202 gal/yr
12 Roads	AP-42, Section 13.2.1 Paved Roads	PM PM_{10}	<u>sL</u> 0.74 0.74	<u>k</u> 0.011 0.0022	Sweeping, water truck, speed limits	N/A	@365 days/yr 334.3 mile/day 122,006.5 mile/yr No rain
	AP-42, Section 13.2.2 Unpaved Roads and measured silt data	PM PM_{10}	<u>sL</u> 1.5 1.5	<u>k</u> 4.9 1.5			@365 days/yr 82.9 mile/day 30,243.9 mile/yr 105 days rain
13	NCASI TB 424	8.150 lb PM/day/acre			None	N/A	Outside Bark

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	Section 13.2.4	0.650 acre 0.18% silt # dry days: 260 days/yr % Time Wind = 13			Storage
15	MSDS	0.22% by wt content VOC 0.10% by wt Acetaldehyde 0.03% by wt CH_2O 0.07% by wt Methanol 0.10% by wt Vinyl Acetate	None	N/A	7,884,000 panels/yr 900 panels/hr 1.25 lb adhesive/panel
16	NCASI Wood Products (Feb 2013)	PM (fil): 2.76E-03 lb/ODT PM_{10}/ $PM_{2.5}$: 5.24E-03 lb/ODT Various HAPs	None	N/A	20% Safety Factor 600,000 MSF/yr 90 MSF/hr 695,009 ODT/yr 79 ODT/hr
	Wood Products Protocol 1 (WPP1)	VOC: 0.25 lb/MSF			
17	AP-42, 3.4	<u>Units in lb/HP-hr</u> PM (fil): 8.40E-04 PM_{10}/ $PM_{2.5}$: PM (fil) + PM (con) SO_2: 1.46E-05 VOC: 6.35E-04 CO: 6.60E-03 NOx: 2.88E-02 PM (con): 9.24E-03 lb/MMBtu Various HAPs	None	N/A	20% Safety Factor 1,341 HP 9.4 MMBtu/hr 500 hr/yr
18	40 CFR 90.103	CO: 519 g/kW-hr NOx: 13.4 g/kW-hr	None	N/A	20% Safety Factor 17 kW 0.23 MMBtu/hr 500 hr/yr
	AP-42, 3.2-3	<u>Units in lb/MMBtu</u> PM (fil): 1.14E-02 PM (con): 1.19E-02 PM_{10}/ $PM_{2.5}$: PM (fil) + PM (con) SO_2: 7.06E-04 VOC: 3.55E-02 Various HAPs			
19	AP-42, 3.3	<u>Units in lb/hp-hr</u> PM/PM_{10}/ $PM_{2.5}$: 2.64E-03 SO_2: 2.46E-03	None	N/A	20% Safety Factor 1.86 MMBtu/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		VOC: 3.02E-03 CO: 8.02E-03 NOx: 3.72E-02 Various HAPs			266 HP 500 hr/yr
20	Wash Water Sample Analysis	TOC content: 1,668.82 mg/L	None	N/A	2,268,000 gal/yr capacity
	AP-42, 1.4	<u>Units in lb/MMscf</u> PM (fil): 1.9 PM (con): 5.7 PM_{10}/ $PM_{2.5}$: PM (fil) + PM (con) SO_2: 0.6 VOC: 5.5 CO: 84 NOx: 100 Various HAPs	None	N/A	2.95 MMBtu/hr NG burner 259 gal/hr 2,268 Mgal/yr
	Testing	VOC: 1.39E-02 lb/gal	None	N/A	259 gal/hr 2,268 Mgal/yr
21	Manuf Spec	<u>Units in g/HP-hr</u> CO: 42.43 VOC: 0.52 NOx: 4.04	None	N/A	70 HP 0.46 MMBtu/hr 500 hr/yr
	AP-42, 3.2	<u>Units in lb/MMBtu</u> PM: 9.50E-03 PM_{10}: 1.94E-02 $PM_{2.5}$: 1.94E-02 SO_2: 5.88E-04 Various HAPs: 3.22E-02	None	N/A	
21	NSPS JJJJ	<u>Units in g/HP-hr</u> CO: 4.0 VOC: 1.0 NOx: 2.0	None	N/A	229 HP 2.08 MMBtu/hr 500 hr/yr
	AP-42, 3.2	<u>Units in lb/MMBtu</u> PM: 9.50E-03 PM_{10}: 1.94E-02 $PM_{2.5}$: 1.94E-02 SO2: 5.88E-04 Various HAPs: 3.22E-02	None	N/A	

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01, 02	PM_{10} NO_X VOC [THC (as carbon)]	5 or 201 7E 25A	Every 5 years, alternate RTOs	63 DDDD
01,02	CO	10	Every 5 years, each RTO	Basis for Calculations
02	PM_{10} NO_X VOC [THC (as carbon)] CO	5 or 201 7E 25A 10	If TCO is operated, then within 180 days of operation, per PWC #3, after that every 5-yrs.	63 DDDD for CO basis of calc.
01, 02	Total HAPs	25A	Once	IPT
01, 02	Opacity	9	Every 5 years	63 DDDD
01, 02	Formaldehyde	Acetylacetone Method; . . . Or other test method upon the Department's approval.	Every 5 years	Basis for Calculations
03	PM and PM_{10}	5 or 201A and 202	Once	Emission verification

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	RTO A, RTO B, and RTO D Minimum Temperatures - 1546°F, 1548°F, 1,525°F respectively Subsequent performance test	CEM	At least every 15 minutes & reduce the data to 3-hour block average to confirm compliance with minimum temps	Y

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
	that demonstrates compliance with permit may change the minimum operating temperature			
01	Isolation Damper	CEM	As occurs changes in damp position: "Open" or "Closed"	N
02	RTO Minimum Temperature [1492 °F] TCO Minimum Temperature [1250 °F] Subsequent performance test that demonstrates compliance with permit may change the minimum operating temperature	CEM	At least every 15 minutes & reduce data to 3-hour block average to confirm compliance w/minimum temp TCO not operating currently.	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)
Facility	OSB Throughput	600 MMSF/yr on a 3/8-inch basis OSB	Monthly and 12 rolling months	Y
01 RTO-D	Initial Test (All Tests)	All items pertaining to SN-01 and/or RTO emissions	Within 12 months of startup	Y
01 & 02 RTO	Performance Tests	PM_{10}, VOC, NO_X, and formaldehyde (1 of 3 RTO A/B/D with 5 dryers operating)	Every 5 years Keep latest test	Y entire report
01 & 02 RTO	Performance Tests	CO (2 of 3 RTO A/B/D separately	Every 5 years Keep	Y entire

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		with 5 dryers operating @90%+)	latest test	report
01, 02	SSM Plan, SAM Reports and immediate reports of malfunctions	Report malfunctions (Submit start-up, shutdown & malfunction events inconsistent with SSM Plan) Keep current SSM Plan onsite and keep revised SSM Plans for 5 years	Every 6 months	Y
01	Minimum Operating Temperature of RTO A, B, and D	RTO-A: 1546 °F RTO-B: 1548 °F (both based on August 2, 2023 performance test); RTO-D: 1525 °F (testing TBD within 12 months of startup); Subsequent performance test that demonstrates compliance with permit may change the minimum operating temperature	Every 15 minutes & reduce the data to 3-hour block average, Record Daily	N
01 & 02	Inlet Fan Static Pressure readings	n/a	Recorded hourly and averaged every 12 hours.	N
01A	When venting to atmosphere, fuel used, and amount of fuel used	Only Natural Gas allowed to vent directly to atmosphere	As occurs	N
02	Minimum Operating Temperature of TCO & RTO	RTO: 1492 °F (based on July 31 & August 1, 2023 performance test); TCO: 1250 ° (based on March 26, 2004 performance test); Subsequent performance test that demonstrates compliance with permit may change the minimum operating temperature	Every 15 minutes & reduce the data to 3-hour block average, Record Daily	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
11	VOC emitted & MSDS or equivalent documentation	18.0 tpy	Monthly	N
		0.31 VOC/gal	Monthly	
	Use only non-HAP coatings (see SC #67) & MSDS or equivalent documentation	Non-HAP coating is defined as coating with HAP contents below 0.1% by mass for OSHA defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0% by mass for other HAP compounds.	Ongoing	
	MSDS or equivalent documentation of SN-11 ammonia containing materials	Ammonia content of material not to exceed one percent (1.0%) by weight	Ongoing	
11	Notification	According to the schedule in 40 CFR §63.2280 and according to 40 CFR Part 63, Subpart A	Ongoing	Y
13	Combined storage area	0.65 acres	Annual	Y
15	<u>If the affected source applies coating to products in the following subcategory</u>: 1. Exterior Siding and Primed Doorskins 2. Flooring 3.Interior Wall Paneling or Tileboard 4.Other Interior Panels 5. Doors, Windows, and Miscellaneous	Must limit organic HAP emissions to the atmosphere to no more than the applicable emission limit(s) in the following table <u>in grams HAP/liter solids (lb HAP/gal solids) is</u> 1. 0 (0.00) 2. 0 (0.00) 3. 5 (0.04) 4. 0 (0.00) 5. 57 (0.48)	Monthly and 12 month rolling	N
15	VOC Acetaldehyde	<u>Shall not exceed following Content Limit</u>	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Formaldehyde Methanol Vinyl Acetate [May be MSDS sheets & spreadsheet]	VOC -0.22 % by weight Acetaldehyde - 0.10 % by weight Formaldehyde -0.03 % by weight Methanol - 0.07 % by weight Vinyl Acetate - 0.10 % by weight		
17	Hours of Operation	Nte 500 operating hours per calendar year, based on non-resettable hour meter	Monthly	N
18	Hours of Operation	Nte 500 operating hours per calendar year, based on non-resettable hour meter	Monthly	N
19	Hours of Operation	Nte 500 operating hours per calendar year, based on non-resettable hour meter	Monthly	N
21	Hours of Operation	Nte 500 operating hours per calendar year, based on non-resettable hour meter	Monthly	N
22	Hours of Operation	Nte 500 operating hours per calendar year, based on non-resettable hour meter	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02	10%	8 CAR § 40-401 and A.C.A.	Monthly Observations
01, 02	20%	8 CAR § 41-403 and A.C.A.	Daily observation if off-line maintenance activities performed between 6 a.m. and 6 p.m.
01A	10%	8 CAR § 40-401 and A.C.A.	Use of natural gas as fuel
03	10%	8 CAR § 40-401 and A.C.A.	Weekly Observations
04 thru 09	10%	8 CAR § 40-401 and A.C.A.	Monthly Observations

SN	Opacity	Justification for limit	Compliance Mechanism
10	20%	8 CAR § 41-403 and A.C.A.	Monthly Observations
12 (off-site)	5%	A.C.A.	Water sprays, etc
13	20%	8 CAR § 41-403 and A.C.A.	None
17	20%	8 CAR § 41-403 and A.C.A.	Use of diesel fuel only
18	5%	8 CAR § 40-401 and A.C.A.	Use of propane as fuel
19	20%	8 CAR § 41-403 and A.C.A.	Use of diesel fuel only
20	5%	8 CAR § 40-401 and A.C.A.	Use of natural gas as fuel
21	5%	8 CAR § 40-401 and A.C.A.	Use of propane as fuel
22	5%	8 CAR § 40-401 and A.C.A.	Use of natural gas as fuel

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	Emissions (tpy)						
		PM/ PM_{10}	SO_2	VOC	CO	NO_X	HAPs	
							Single	Total
Four (4) Portable Heaters (0.07 MMBtu/hr total)	A-1	8.76E-4	0.156	1.56E-3	0.011	0.040	1.5E-5	1.5E-5
Kerosene Fueling Tank (250 gal)	A-2	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Maintenance Shop: Diesel Tank (250 gal)	A-2	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Hydraulic Room: Hydraulic Oil Tank (250 gal)	A-2	-	-	9.21E-4	--	--	9.21E-4	9.21E-4
Oil Storage Building: Gear Oil Tank (250 gal)	A-2	--	--	9.21E-4	--	--	9.21E-4	9.21E-4

Source Name	Group	Emissions (tpy)						
		PM/ PM_{10}	SO_2	VOC	CO	NO_X	HAPs	
							Single	Total
Oil Storage Building: Six (6) Hydraulic and Gear Oil Tanks (65 gal each)	A-2	--	--	5.53E-3	--	--	5.53E-3	5.53E-3
Mobile Equipment Shop: Used Oil Tank (250gal)	A-2	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Mobile Equipment Shop: Engine Oil Tank (120 gal)	A-2	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Mobile Equipment Shop: Hydraulic Oil Tank (65 gal)	A-2	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Mobile Equipment Shop: Transmission Fluid Tank (65 gal)	A-2	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Diesel Fueling Tank (3,200 gal)	A-3	--	--	2.23E-3	--	--	2.23E-3	2.23E-3
Emergency Generator Diesel Tank (2,000 gal)	A-3	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Fire Pump Diesel Tank (500 gal)	A-3	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Green End Hydraulic Oil Tank (280 gal)	A-3	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Green End Hydraulic Oil Tank (300 gal)	A-3	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Green End Hydraulic Oil Tank (550 gal)	A-3	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Two (2) Woodyard Used Oil Tanks (300 gal each)	A-3	--	--	1.84E-3	--	--	1.84E-3	1.84E-3
Hydraulic Room: Press Pit Used Oil Tank (6,000 gal)	A-3	--	--	4.83E-3	--	--	4.83E-3	4.83E-3
Thermal Oil Tank (2,000 gal)	A-3	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Thermal Oil Tank (400 gal)	A-3	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Oil Storage Building: Hydraulic Oil Tank (500 gal)	A-3	--	--	9.21E-4	--	--	9.21E-4	9.21E-4

Source Name	Group	Emissions (tpy)						
		PM/ PM_{10}	SO_2	VOC	CO	NO_X	HAPs	
							Single	Total
Oil Storage Building: Used Oil Tank (280 gal)	A-3	--	--	9.21E-4	--	--	9.21E-4	9.21E-4
Two (2) Wax Tanks (10,000 gal each)	A-3	No emissions expected						
Coolant Tote (451 gal)	A-3	--	--	0.0	--	--	0.0	0.0
Maintenance Welding and Cutting	A-7	0.02	--	--	--	--	0.072	0.072
Gasoline Fueling Tank (500 gal)	A-13	--	--	0.24	--	--	0.24	0.24
MDI Resin Tanks (two 10,000 gal tanks and two 6,000 gal tanks)	A-13	--	--	5.2E-3	--	--	5.2E-3	5.2E-3
Sanderdust Truck Loading	A-13	6.86E-3	--	--	--	--	--	--
Flake Dryer Bins	A-13	0.18	--	--	--	--	--	--
Bin Overfill Area	A-13	0.18	--	--	--	--	--	--
Thermal Oil Tank (15,000 gal)	A-13	--	--	0.01	--	--	0.01	0.01
Supplemental Fuel Handling	A-13	6.74E-3	--	--	--	--	--	--

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 #
1803-AOP-R27

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: 1803-AOP-R28
AFIN: 07-00212

$/ton factor	28.14	Annual Chargeable Emissions (tpy)	2178.01
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	☐
If Hold Active Permit, Amt of Last Annual Air Permit Invoice $	0
Total Permit Fee Chargeable Emissions (tpy)	0
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		574.8	574.8	0	0	574.8
PM_{10}		522.4	522.4	0		
$PM_{2.5}$		0	0	0		
SO_2		34.9	34.9	0	0	34.9
VOC		1117.1	1117.1	0	0	1117.1
CO		957.5	957.5	0		
NO_X		430.3	430.3	0	0	430.3
Lead	☑	0.09	0.09	0	0	0.09

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Acetaldehyde	☐	34.96	34.96	0		
Acrolein	☐	8.27	8.27	0		
Formaldehyde	☐	19.37	19.37	0		
Methanol	☐	73.85	73.85	0		
Pentachlorophenol	☐	0.0000315	0.0000315	0		
Phenol	☐	12.66	12.66	0		
Vinyl Acetate	☐	4.93	4.93	0		
m-Xylene	☐	0.49	0.49	0		
Antimony	☐	0.00651	0.00651	0		
Arsenic	☐	0.0108	0.0108	0		
Beryllium	☐	0.0000478	0.0000478	0		
Cadmium	☐	0.00644	0.00644	0		
Chlorine	☑	1.17	1.17	0	0	1.17
Chromium VI	☐	0.0098	0.0098	0		
Chromium (total)	☐	0.0605	0.0605	0		
Cobalt	☐	0.00475	0.00475	0		
Hydrochloric Acid	☑	0.6	0.6	0	0	0.6
Hydrogen Fluoride	☑	0.26	0.26	0	0	0.26
Manganese	☐	1.59	1.59	0		
Mercury	☐	0.00186	0.00186	0		
Nickel	☐	0.0708	0.0708	0		
Selenium	☐	0.00193	0.00193	0		
Total HAPs	☐	178.29	178.29	0		
Acetone	☑	13.85	13.85	0	0	13.85
Ammonia	☑	4.94	4.94	0	0	4.94