

ADEQ OPERATING AIR PERMIT

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

Permit #: 904-AOP-R1

IS ISSUED TO:

Kawneer Company, Inc.
600 Kawneer Drive
Springdale, AR 72764
Washington County
CSN: 72-0205

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:

August 25, 1999 and August 24, 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Amended

SECTION I: FACILITY INFORMATION

PERMITTEE:	Kawneer Company, Inc.
CSN:	72-0205
PERMIT NUMBER:	904-AOP-R1
FACILITY ADDRESS:	600 Kawneer Drive Springdale, AR 72764
MAILING ADDRESS:	P.O. Box 709 Springdale, AR 72765
COUNTY:	Washington
CONTACT PERSON:	Gregory Smith
TELEPHONE NUMBER:	(501)756-4444
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REVIEWING ENGINEER:	Paul Osmon
UTM North-South (Y):	3995.9 km N
UTM East-West (X):	400.5 km E
	Zone 15

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SECTION II: INTRODUCTION

Summary of Permit Activity

Permit 904-AOP-R1 is the first modification to the operating permit issued to Kawneer Company, Inc. under Regulation 26. The physical change in the facility with the issuance of this permit is to modify the paint line such that more of the emissions generated will now be routed to the oxidizer. The permit is also being modified to adjust the minimum thermal oxidizer bed temperature requirement in the permit, to add three small previously un-permitted sources, and to add extra flexibility to the hazardous air pollutant usage limits in the permit. The facility will also be authorized to operate for short periods of time with the thermal oxidizer not functioning. Record keeping will be required to account for all VOCs applied during this period as being emissions. The permit limits for volatile organic compounds and hazardous air pollutants will be reduced and compliance assurance will be changed to a material balance.

Process Description

Kawneer Company, Inc. owns and operates an aluminum fabrication and finishing facility in Springdale. Operations at this facility include the extrusion process, the anodizing area, the paint line process, and the fabrication area. A description of each of these operations may be found below.

Extrusion Process

The extrusion process is the initial process used to form the shape of the metal used in the fabrication of the architectural building components. In this process, the aluminum billet or logs are received by the facility from an outside source. These logs move by conveyor to a natural gas fired oven. In the oven, the logs are heated to approximately 850E F for use in the extrusion process. Once the logs exit the oven, they are cut to length by a shear and move forward to the extrusion press.

The extrusion press is the operation that forms the metal into the particular profile needed for the fabrication order. The extruded shape moves onto the stretcher table where the metal is pulled from the press and allowed to cool. Once the metal reaches the end of the table, the metal is stretched to straighten the shape and cut to length. The metal is then off loaded and staged for further processing.

Metal from the press then enters the age oven where the metal is heated to a given temperature and held at that temperature for a preset period of time. This process allows the metal to properly harden and achieve the properties needed for further processing.

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Sources of emissions from the extrusion process are products of combustion of natural gas from the log ovens (SN-02 and SN-22) and the age ovens (SN-03, SN-23, and SN-24).

Anodizing Area

Anodizing is a process used to impart a particular finish on an extruded aluminum shape. This process involves the use of inorganic and in some cases organic chemicals to impart a particular finish on the shape. The process consists of several tanks in which the parts are immersed. The parts are first cleaned and rinsed and then immersed in the various chemical tanks in a preplanned sequence in order to achieve the proper finish on the metal. Once the process is complete, the metal moves on to shipping or to another process for further processing.

Emissions from this process are products of combustion of natural gas from the burners used to heat the tanks (SN-14 through SN-18) and fugitive emissions from the sulfuric acid and caustic tanks (SN-27).

Paint line Process

The paint line is used to finish the extruded shapes with various architectural coatings. The metal processed in this area goes through two stages of production: pretreatment and painting.

In the pretreatment stage, the metal is cleaned and then treated with chromic acid in order to prepare the surface for the paint. Once the treatment is complete, the metal moves to the paint line. In this process, the metal is painted in a booth using electrostatic spray guns and then the finish is cured in a bake oven. Once the painting process is completed, the metal is staged for shipment or further processing. Also associated with this process is the touchup and the repair booths and the repair oven used to recure the repaired parts.

Emissions from this process are products of combustion of natural gas from the burners of the bake oven (SN-09), repair oven (SN-07) and the burners for the tanks on the pretreatment line (SN-19, SN-20, and SN-25). Also, this process emits VOC from the spray booths and bake oven which are both controlled by a thermal oxidizer (SN-09 and SN-21). Uncontrolled emissions come from the flashoff area for primer applications (SN-01). Kawneer has enclosed the other flashoff area previously designated SN-10. Emissions from this area are now routed through the thermal oxidizers and are accounted for under Source Numbers SN-09 and SN-21. Emissions from the touch up booths (SN-06 and SN-08) are routed to the thermal oxidizer. The repair booths (SN-12 and SN-13) and the repair oven (SN-07) are exhausted uncontrolled to the atmosphere.

An occasional use primer booth is also located at this facility and has been designated as source

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SN-29. This source is vented uncontrolled to the atmosphere.

Two paint hook burn off ovens are used to burn the paint off the hooks that carry the various parts through the painting lines. Each of these ovens is natural gas fired and has a rated capacity of 0.5 MMBTU/hr. These ovens are considered to be insignificant sources of emissions.

Fabrication Process

The fabrication process involves general operations used to prepare components for final assembly. These operations include cutting, drilling, shearing, and stamping of parts prior to final assembly. In this area, emissions are limited to non-point source emissions related to the use of adhesives and sealers. Emissions from the wall product fabrication are accounted for in the above listed sources. Emissions from the window product fabrication are designated as source SN-26.

Regulations

The facility is subject to regulation under the *Clean Air Act* as amended, the *Arkansas Water and Air Pollution Control Act*, the *Arkansas Air Pollution Control Code* (Regulation 18), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulations of the Arkansas Operating Air Permit Program* (Regulation 26). Permitted emissions of all criteria pollutants will be less than 250 tons per year with the issuance of this permit. Therefore, Kawneer will no longer be considered a major source with respect to the Prevention of Significant Deterioration regulations.

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table.

This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	1.4	3.0	
		PM ₁₀	1.4	3.0	
		SO ₂	1.4	1.4	
		VOC	489.9	231.6	

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EMISSION SUMMARY						
Source No.		Description	Pollutant	Emission Rates		Cross Reference Page
				lb/hr	tpy	
		HAPs* Facility	CO	1.6	5.2	
			NO _x	5.3	21.7	
			HAP (paint processes)*	488.5	230	
			VOC (paint processes)	-	230	
Facility		HAP (paint processes)	-	230	-	
01	Flash Off Area Non-Point Source Emissions	VOC HAP	7.1 7.1	i i i	13	
02	Log Oven	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.2 0.6	0.3 0.3 0.1 0.2 0.5 2.4	14	
03	Age Oven	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.3	0.2 0.2 0.1 0.1 0.3 1.1	16	
06	#1 Touch Up Booth	Emissions are routed to SN-21				
07	Repair Bake Oven	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.1	0.1 0.1 0.1 0.1 0.1 0.2	20	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
08	#2 Touch Up Booth	Emissions are routed to SN-21			
09 & 21	Main Bake Oven & Thermal Oxidation System	PM	0.1	0.4	27
		PM ₁₀	0.1	0.4	
		SO ₂	0.1	0.1	
		VOC (combustion)	0.1	0.2	
		CO	0.2	0.6	
		NO _x	0.6	2.7	
		VOC (paint) and HAP are accounted for at SN-21			
10	Flash Off Area	This source deleted this permit modification.			
12	#1 Repair Booth	VOC	4.0	i	18
		HAP	4.0	i i	
13	#2 Repair Booth	VOC	4.0	i	18
		HAP	4.0	i i	
14	Anodizing Burner - Tank No. 1	PM	0.1	0.2	22
		PM ₁₀	0.1	0.2	
		SO ₂	0.1	0.1	
		VOC	0.1	0.1	
		CO	0.1	0.4	
		NO _x	0.4	1.7	
15	Anodizing Burner - Tank No. 3	PM	0.1	0.2	22
		PM ₁₀	0.1	0.2	
		SO ₂	0.1	0.1	
		VOC	0.1	0.1	
		CO	0.1	0.4	
		NO _x	0.4	1.7	
16	Anodizing Burner	PM	0.1	0.2	22

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
	- Tank No. 18	PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.4	0.2 0.1 0.1 0.4 1.7	
17	Anodizing Burner - Tank No. 19	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.4	0.2 0.2 0.1 0.1 0.4 1.7	22
18	Anodizing Burner - Tank No. 20	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.4	0.2 0.2 0.1 0.1 0.4 1.7	22
19	Paint Room Burner - Tank #1	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.3	0.2 0.2 0.1 0.1 0.3 1.4	25
20	Paint Room Burner - Tank #3	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.3	0.2 0.2 0.1 0.1 0.3 1.1	25
21	Thermal Oxidation System	VOC HAP	16.4 16.4	i i i	27

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
21A	Thermal Oxidation System Bypass Stack	VOC HAP	468.2 468.2	i i i	27
22	Log Oven	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.4	0.2 0.2 0.1 0.1 0.4 1.6	14
23/24	Age Oven	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.4	0.2 0.2 0.1 0.1 0.4 1.6	16
25	Paint Room Burner - Tank #5	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.3	0.2 0.2 0.1 0.1 0.3 1.1	25
26	Window Plant Non-Point Source Emissions	VOC HAP	2.0 2.0	i i i	31
27	Anodizing	Insignificant Activity			
29	Occasional Use Primer Booth	VOC HAP	2.0 2.0	i i i	18

* HAPs included in the VOC totals are indicated by an *. Other HAPs are

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not included in any other totals unless specifically stated.

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

i Included in facility-wide limit of 230 tpy from coating processes

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SECTION III: PERMIT HISTORY

Permit No. 904-A was issued to Kawneer Company, Inc. on November 8, 1988. This permit allowed for the installation of a thermal oxidizing system to control emissions of volatile organic compounds (the only pollutant identified in this permit).

Permit No. 904-AR-1 was issued to Kawneer Company, Inc. on December 23, 1992. Under this permit, a new conveyor system and baking oven were installed. Only emissions of volatile organic compounds were identified in this permit.

Permit No. 904-AR-2 was issued to Kawneer Company, Inc. on March 26, 1996. A log oven and an age oven were installed under this permit. Also, all five criteria pollutants were identified in this permit.

Permit No. 904-AOP-R0 was issued to Kawneer Company, Inc. on August 25, 1999. This was the first permit issued to the facility under Regulation 26. Permit limits were: PM/PM₁₀ - 1.6 tpy, SO₂ - 1.4 tpy, VOC - 311.1 tpy, CO - 5.2 tpy, NO_x - 22.9 tpy, Sulfuric Acid - 0.8 tpy, Butyl Carbitol - 13.81 tpy, Butyl Cellosolve Acetate - 14.35 tpy, Dimethyl Phthalate - 26.71 tpy, Ethylbenzene - 5.28 tpy, Methyl Ethyl Ketone - 8.04 tpy, Methyl Isobutyl Ketone - 5.20 tpy, Propylene Glycol - 33.59 tpy, Toluene - 43.25 tpy, and Xylene - 80.69 tpy.

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SECTION IV: EMISSION UNIT INFORMATION

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SN-01
Flash Off Area Non-Point Source Emissions

Source Description

Source SN-01 accounts for the non-point source flashoff emissions. These consist of emissions from the first primer booth which are not captured in the enclosure due to low velocities in the conveyor entrance.

The annual emissions of VOCs and HAPs have been included in the limits which have been set forth in the plantwide conditions.

Specific Conditions

1. Pursuant to §19.501 et seq of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. These emissions have been based upon the VOC content of the paints and solvents as well as the maximum short term capacity of the equipment. Compliance with these emission rates will be demonstrated through the VOC content of the paints and solvents.

SN-#	Pollutant	lb/hr
01	VOC	7.1

2. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. These emissions have been based upon the HAP content of the paints and solvents as well as the maximum short term capacity of the equipment. Compliance with these emission rates will be demonstrated through the HAP content of the paints and solvents.

SN-#	Pollutant	lb/hr
01	HAP	7.1

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SN-02 and SN-22
Log Ovens

Source Description

The natural gas fired log ovens are used to heat the aluminum billets or logs for use in the extrusion process. Source SN-02 has a rated capacity of 5.4 MMBTU/hr while source SN-22 has a rated capacity of 3.53 MMBTU/hr.

These two sources are permitted to operate at capacity for 8,760 hours per year. Therefore, no records for these two sources are required for this permit.

Specific Conditions

3. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN-#	Pollutant	lb/hr	tpy
02	PM ₁₀	0.1	0.3
	SO ₂	0.1	0.1
	VOC	0.1	0.2
	CO	0.2	0.5
	NO _x	0.6	2.4
22	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.4
	NO _x	0.4	1.6

4. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/hr	tpy
02	PM	0.1	0.3

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SN-#	Pollutant	lb/hr	tpy
22	PM	0.1	0.2

5. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity as measured by EPA Reference Method 9 from sources SN-02 and SN-22. Compliance with this condition will be demonstrated through compliance with Specific Conditions 6 and 7.
6. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, pipeline quality natural gas shall be the only fuel used to fire sources SN-02 and SN-22. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 SCF of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas.
7. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, all aluminum introduced into the ovens shall be clean and free of any combustibles (oil, grease, etc.).

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SN-03 and SN-23/24
Age Ovens

Source Description

The natural gas fired age ovens are used to heat metal from the presses. Source SN-03 has a rated capacity of 2.5 MMBTU/hr while source SN-23/24 has a rated capacity of 3.5 MMBTU/hr.

The three sources are all permitted to operate at capacity for 8,760 hours per year. Therefore, no records are required to be kept for these sources.

Specific Conditions

8. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/hr	tpy
03	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.3
	NO _x	0.3	1.1
23/24	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.4
	NO _x	0.4	1.6

9. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/hr	tpy
03	PM	0.1	0.2

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SN-#	Pollutant	lb/hr	tpy
23/24	PM	0.1	0.2

10. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity as measured by EPA Reference Method 9 at sources SN-03 and SN-23/24. Compliance with these opacity limits shall be demonstrated through compliance with Specific Conditions 11 and 12.
11. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used to fire sources SN-03 and SN-23/24. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 SCF of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas.
12. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, all metal introduced into the ovens shall be clean and free of any combustibles (oil, grease, etc.).

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SN-12, SN-13 and SN-29
Repair Booths and Occasional Use Primer Booth

Source Description

Sources SN-12 and SN-13 are paint booths which are used to repaint parts. An Occasional Use Primer Booth (SN-29) is used to prime special projects. No control equipment is associated with these paint booths.

The annual VOC and HAP emission rates are included in the facility wide total which may be found in the plantwide conditions.

Specific Conditions

13. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. These emission rates are based upon the VOC content of the paints and solvents used at this source as well as the short term capacity of the equipment. Compliance with these emission rates will be demonstrated through the VOC content of the paints and solvents.

SN-#	Pollutant	lb/hr
12	VOC	4.0
13	VOC	4.0
29	VOC	2.0

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14. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. These emission rates are based upon the HAP contents of the paints and solvents used at this source as well as the short term capacity of the equipment. Compliance with these emission rates will be demonstrated through the VOC content of the paints and solvents.

SN-#	Pollutant	lb/hr
12	HAP	4.0
13	HAP	4.0
29	HAP	2.0

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SN-07
Repair Oven

Source Description

The repair oven is used for recurring parts which have been touched up or repaired. This natural gas fired source has a rated heat capacity of 0.4 MMBTU/hr.

This source is permitted to fire natural gas at capacity for 8,760 hours per year. Therefore, no natural gas usage records are required to be kept for this source.

Specific Conditions

15. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. **Compliance with the emission rates will be demonstrated by only using natural gas to fire these sources.**

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.1
SO ₂	0.1	0.1
VOC	0.1	0.1
CO	0.1	0.1
NO _x	0.1	0.2

16. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

Pollutant	lb/hr	tpy
PM	0.1	0.1

17. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity as measured by EPA Reference Method 9 at source SN-07. Compliance with this opacity limit shall be demonstrated through compliance with Specific Condition 18.

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18. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used to fire source SN-07. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 SCF of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas.

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SN-14, SN-15, SN-16, SN-17, and SN-18
Anodizing Burners

Source Description

Each of the anodizing burners is fired with natural gas. All of the burners have a rated heat input capacity of 3.8 MMBTU/hr.

The anodizing burners are all permitted to operate at capacity for 8,760 hours per year. Therefore, no records are required to be kept for these sources.

Specific Conditions

19. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/hr	tpy
14	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.4
	NO _x	0.4	1.7
15	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.4
	NO _x	0.4	1.7
16	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.4
	NO _x	0.4	1.7
17	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.4

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SN-#	Pollutant	lb/hr	tpy
	NO _x	0.4	1.7
18	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.4
	NO _x	0.4	1.7

20. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/hr	tpy
14	PM	0.1	0.2
15	PM	0.1	0.2
16	PM	0.1	0.2
17	PM	0.1	0.2
18	PM	0.1	0.2

21. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity as measured by EPA Reference Method 9 at sources SN-14, SN-15, SN-16, SN-17, and SN-18. Compliance with the opacity limits will be demonstrated through compliance with Specific Condition 22.
22. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used to fire sources SN-14, SN-15, SN-16, SN-17, and SN-18. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 SCF of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas.

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SN-19, SN-20, & SN-25
Paint Room Burners

Source Description

The paint room burners (chemical pretreatment) are all natural gas fired. Source SN-19 has a rated capacity of 3.0 MMBTU/hr while sources SN-20 and SN-25 each have a rated capacity of 2.5 MMBTU/hr.

These sources are all permitted to operate at capacity for 8,760 hours per year. Therefore, there are no record keeping requirements in this permit for these sources.

Specific Conditions

23. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/hr	tpy
19	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.3
	NO _x	0.3	1.4
20	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.3
	NO _x	0.3	1.1
25	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.3
	NO _x	0.3	1.1

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24. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN-#	Pollutant	lb/hr	tpy
19	PM	0.1	0.2
20	PM	0.1	0.2
25	PM	0.1	0.2

25. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity as measured by EPA Reference Method 9 at sources SN-19, SN-20, and SN-25. Compliance with the opacity limits will be demonstrated through compliance with Specific Condition 26.
26. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used to fire sources SN-19, SN-20, and SN-25. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 SCF of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas.

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SN-06, SN-08, SN-09, SN-21, & SN-21A
Touch-up Booths, Bake Oven, Oxidation System, & Oxidation System Bypass Stack

Source Description

The main bake oven (SN-09) cures the parts which have been painted on the automated paint line. The emissions from this source are then routed to the thermal oxidizing system.

There are 8 coating application booths planned within the enclosure consisting of two primer booths followed by two top coat booths, the two touch-up booths, and then two clear coat booths. One of the primer booths is where the conveyer enters the enclosure. Emissions from these 8 booths all are processed through the thermal oxidizer. It is assumed that 5% of the primer application VOC and HAP are not captured due to the lower velocity through the conveyer opening.

The touch-up booths (SN-06 and SN-08) are used to recoat areas which were missed in the main paint booths. Emissions from these sources will be routed to the thermal oxidizer and therefore will no longer be individual emission sources after the paint line modification is complete.

The main bake oven (SN-09) is natural gas fired with a rated heat capacity of 6.0 MMBTU/hr. It is permitted to operate at capacity for 8,760 hours per year. Therefore, the permittee is not required to maintain natural gas usage records for this source.

The thermal oxidizer (SN-21) is fired with the exhaust gases from the bake oven. The permittee is allowed to operate through the oxidation system bypass stack (SN21-A) for short intervals. Daily record keeping of all paint usage in the main paint booths and touch-up booths is required during the time the bypass is open.

Specific Conditions

27. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
09	PM ₁₀	0.1	0.4
	SO ₂	0.1	0.1
	VOC (Combustion)	0.1	0.2
	CO	0.2	0.6
	NO _x	0.6	2.7

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SN	Pollutant	lb/hr	tpy
21	VOC	16.4	i
21A	VOC	468.2	i

i Included in facility-wide limit of 230 tpy from coating processes

28. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

	Pollutant	lb/hr	tpy
09	PM	0.1	0.4
21	HAP	16.4	i i
21A	HAP	468.2	i i

i i Included in facility-wide limit of 230 tpy from coating processes

29. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from sources SN-09, SN-21 and SN-21A as measured by EPA Reference Method 9. Compliance with this opacity limit will be demonstrated by maintaining the minimum temperature set forth in Specific Condition No. 30.
30. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311 and 40 CFR 70.6, the bed temperature at both ends of the oxidation system shall not fall below 1500EF while operating.
31. Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall install and maintain a device to continuously measure and record the bed temperature at both ends of the oxidation system in order to demonstrate compliance with Specific Condition No. 30.
32. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall maintain the following operational parameters in order to continuously demonstrate the 100% capture efficiency used in the VOC emission calculations for the booths where the primer, topcoat, clear coat and touch-up painting are applied (except the limits of Specific Condition No. 35 shall apply

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to the conveyor entrance into the enclosure). These parameters are the defining criteria for a permanent total enclosure.

1. Any natural draft opening (NDO) shall be at least four opening diameters from each VOC emitting point. And "equivalent diameter" is the diameter of a circle that has the same area as the opening. The equation for an equivalent diameter (ED) is:
$$ED = (4 \times \text{area} / \pi)^{1/2}$$

for a circular NDO, this equation reduces to the diameter of the opening.
 2. The total area of all NDO's shall not exceed five percent of the surface area of the enclosure's walls, floor, and ceiling.
 3. The average face velocity (FV) of air through each NDO's shall be at least 200 ft/min. The direction of air flow through all NDO's shall be into the enclosure.
 4. All access doors and windows whose areas are not included as NDO's shall be closed during routine operation of the process.
33. Pursuant to §19.703 of Regulation 19, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall install and operate a pressure gauge which verifies the pressure differential across the total enclosure. A minimum pressure differential of 90% of the pressure differential across the enclosure measured during the test required in Specific Condition No. 34 will demonstrate the 200 ft/min face value requirement contained in Specific Condition No. 32. The pressure differential must be recorded on a one hour basis. The permittee shall react within a reasonable time to any reduction in differential pressure across the enclosure below 90% of the test pressure. Operating in excess of 4 hours during any rolling one week period without the required 90% differential across the enclosure will be considered a violation of the permit. These records shall be maintained on site and shall be provided to Department personnel upon request.
34. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52 Subpart E, the permittee shall test the face velocity (FV) of the air across each opening and compute a weighted average face velocity for all openings in the total enclosure. This test shall be conducted within 60 days from initial operation of the total enclosure and in accordance with Plantwide Condition No. 3. The permittee shall give the Department written notification of the scheduled date of the initial compliance testing at least fifteen calendar days in advance.

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35. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the minimum average face velocity (FV) of air through any NDO shall be at least 100 ft/min. The direction of air flow shall be into the enclosure.
36. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee may only operate the oxidation system bypass stack (SN21-A) when the thermal oxidizer (SN-21) has an emergency outage or is undergoing preventative maintenance. A written record of hours of operation for the oxidation system bypass stack and the reasons for the outages of the thermal oxidizer shall be maintained. These records shall be kept on site and made available to Department personnel upon request.

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SN-26
Window Plant

Source Description

Emissions from this source are generated through the use of solvents, sealers, etc. which are used to prepare the aluminum components for final assembly.

Emissions from the window plant have been based upon the maximum capacity of the equipment.

Specific Conditions

37. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at source SN-26.

Pollutant	lb/hr	tpy
VOC	2.0	i

i Included in facility-wide limit of 230 tpy from coating processes

38. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table SN-26.

Pollutant	lb/hr	tpy
HAP	2.0	i i

i i Included in facility-wide limit of 230 tpy from coating processes

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Kawneer Company, Inc. is in compliance with the applicable regulations cited in the permit application. Kawneer Company, Inc. 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.

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SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
1. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
2. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
4. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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5. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.
6. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not emit in excess of 230.0 tons of VOCs from the paint processes in any consecutive twelve month period. This does not include the VOCs which are emitted as a result of the combustion of natural gas. Compliance with this condition will be demonstrated through the paint usage records in Plantwide Condition No. 10 and the material balance required in Plantwide Condition No. 11.
7. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311 and 40 CFR Part 70.6, the VOC content of paint blends used shall not exceed 8.0 lbs/gal. This condition does not include materials which are used only at source SN-26.
8. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain the appropriate MSDS sheets and standard mixing recipes on site in order to demonstrate compliance with Plantwide Condition 8.
9. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the paint, solvent and other VOC usages which may be used by the Department for enforcement purposes. These records shall be kept under 3 categories of paint and solvent usages which are: (1) topcoat & clear coat paints and solvents, (2) primers, and (3) repair paints and solvents. Daily records of topcoat, clear coat and primer usage shall be kept when operating during the periods when the thermal oxidizer is not in service. These records shall be updated no later than the fifteenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request.
10. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall complete a spread sheet each month based on the following formula and keep a rolling 12 month total of the results to demonstrate compliance with the limit contained in Plantwide Condition No. 7. These records will be submitted in accordance with General Provision No. 8.

$$\text{MVE} = [\text{TC (A)(B)} + \text{PM (A) (C)} + \text{PM (1.0 -C)} + \text{RB} + 3 \text{VOC}] / \text{H}$$

Where: MVE - monthly VOC emissions in tons
TC - Summation VOC in usage of top coatings and clear coatings with the thermal oxidizer operating for month in lbs

Amended

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PM - Summation VOC in usage of primer coatings with the thermal oxidizer operating for month in lbs.

3VOC - Summation VOC usage in all other compounds in lbs including all topcoat, clear coat and primer usage when the oxidizer is not operating.

A - (0.05) - constant - (1 - destruction efficiency of the oxidizer)

B - 1.0 - Capture efficiency for Top coatings and clear coatings

C - 0.95 - constant - Capture efficiency for primers

RB - Summation VOC in usage of repair coatings for month in lbs

H - 2000 - conversion constant for lbs/tons

11. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not emit in excess of 230.0 tons of HAPs from the paint processes in any consecutive twelve month period. Compliance with this condition will be demonstrated through the paint usage records and the material balance required in Plantwide Condition No. 13.
12. Pursuant to A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall complete a spread sheet each month based on the following formula for each individual HAP and keep a rolling 12 month total of the results to demonstrate compliance with the limit contained in Plantwide Condition No. 12. These records will be submitted in accordance with General Provision No. 8.

$$\text{MHE} = [\text{TC (A)(B)} + \text{PM (A) (C)} + \text{PM (1.0 -C)} + \text{RB} + \text{3HAP}] / \text{H}$$

Where: MHE - monthly HAP emissions in tons

TC - Summation HAP in usage of top coatings and clear coatings when the thermal oxidizer is operating for month in lbs

PM - Summation HAP in usage of primer coatings when the thermal oxidizer is operating for month in lbs.

3HAP - Summation HAP usage in all other compounds in lbs including topcoat, clear coat and primers when the oxidizer is not operating.

A - (0.05) - constant - (1 - destruction efficiency of the oxidizer)

B - 1.0 - Capture efficiency for Top coatings and clear coatings

C - 0.95 - constant - Capture efficiency for primers

RB - Summation HAP in usage of repair coatings for month in lbs

H - 2000 - conversion constant for lbs/tons

Amended

13. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use paints and standard mixing recipes which exceed the following content levels while the thermal oxidizer is in operation. The table allows linear interpolations.

HAP TLV (mg/m ³)	Maximum Content (lb/gal)
6.453	8.0
2.421	3.0
0.807	1.0
0.081	0.1

14. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use paints and standard mixing recipes which exceed the following content levels while the thermal oxidizer is not in operation. The table allows linear interpolations.

HAP TLV (mg/m ³)	Maximum Content (lb/gal)
54.786	8.0
20.547	3.0
6.849	1.0
0.685	0.1

15. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the appropriate MSDS and mixing formulas on site in order to demonstrate compliance with the HAP content limits specified in Plantwide Condition 14 and 15.

Title VI Provisions

16. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
- 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.
17. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - 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.
18. 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.
19. 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.

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

SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated July 20, 2001.

Source No.	Description	Reason
SN-27	Anodizing Area	Group A13
-	Two natural gas fired hook burn off ovens rated 0.5 MMBTU/hr.	Group A13

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

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000, this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.406 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 CFR 70.6(a)(1)(ii) and §26.701(A)(2) of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) of Regulation #26, records of monitoring information required by this permit shall include the following:
6. The date, place as defined in this permit, and time of sampling or measurements;
 - a. The date(s) analyses were performed;
 - b. The company or entity that performed the analyses;
 - c. The analytical techniques or methods used;
 - d. The results of such analyses; and
 - e. The operating conditions existing at the time of sampling or measurement.

7. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
8. Pursuant to 40 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

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

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

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to

minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

10. Pursuant to 40 CFR 70.6(a)(5) and §26.701(E) of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
11. Pursuant to 40 CFR 70.6(a)(6)(i) and §26.701(F)(1) of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
12. Pursuant to 40 CFR 70.6(a)(6)(ii) and §26.701(F)(2) of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
13. Pursuant to 40 CFR 70.6(a)(6)(iii) and §26.701(F)(3) of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
14. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
15. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.701(F)(5) of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.

16. Pursuant to 40 CFR 70.6(a)(7) and §26.701(G) of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
17. Pursuant to 40 CFR 70.6(a)(8) and §26.701(H) of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
18. Pursuant to 40 CFR 70.6(a)(9)(i) and §26.701(I)(1) of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
19. Pursuant to 40 CFR 70.6(b) and §26.702(A) and (B) of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

20. Pursuant to 40 CFR 70.6(c)(1) and §26.703(A) of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
21. Pursuant to 40 CFR 70.6(c)(2) and §26.703(B) of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
22. Pursuant to 40 CFR 70.6(c)(5) and §26.703(E)(3) of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
23. Pursuant to §26.704(C) of Regulation #26, nothing in this permit shall alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including 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.

24. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein