ADEQ
OPERATING
AIR PERMIT

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

Permit No. : 0904-AOP-R2

IS ISSUED TO:

Kawneer Company, Inc.
600 Kawneer Drive
Springdale, AR 72764
Washington County
AFIN: 72-00205

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:

AND

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date

Permittee: Kawneer Company, Inc.
Permit #: 904-AOP-R2
AFIN #: 72-00205

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Table 1 - List of Acronyms

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate matter
PM_{10}	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO_2	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	Kawneer Company, Inc.
AFIN:	72-00205
PERMIT NUMBER:	0904-AOP-R2
FACILITY ADDRESS:	600 Kawneer Drive Springdale, AR 72764
MAILING ADDRESS	P.O. Box 709 Springdale, AR 72764
COUNTY:	Benton
CONTACT POSITION:	Environmental Manager – Gregory X. Smith
CONTACT TELEPHONE NUMBER:	(479)756-4444
FACILITY TELEPHONE NUMBER:	(479)756-2740
FACILITY FAX NUMBER:	(479)756-4408
REVIEWING ENGINEER:	Paul Osmon
UTM North - South (Y):	Zone 15 – 3995.90 km N
UTM East - West (X):	Zone 15 – 400.5 km E

Section II: INTRODUCTION

Summary of Permit Activity

Kawneer Company, Inc. currently operates a manufacturing facility located in Springdale, Arkansas. The facility uses aluminum ingots as a raw material and manufactures finished and painted architectural products.

The facility installed an improved capture system on the painting system in their previous permit modification. The painting processes within the facility have been unable to produce high quality production and efficiency at the air velocities generated at total capture. This permit modification will allow the facility to reduce air velocities, resulting in a slightly reduced capture efficiency.

The initial Title V permit renewal will also be completed with the issuance of this permit. The painting processes at Kawneer Company, Inc. will be subject to 40 CFR 63 – Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Part and Products with an initial compliance date of January 2, 2007. An administratively complete application detailing compliance with this subpart must be submitted at least 180 days before the initial compliance date.

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.

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 a acidic solution containing chromates and phosphates followed by rinsing and drying 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 re-cure 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 primer, topcoat, clear coat, touch-up (formerly called SN-12 and SN-13), and the bake oven which are all controlled by a thermal oxidizer (SN-09 and SN-21). Uncontrolled emissions come from the non-point source emissions. The repair booths (SN-12 and SN-13) and the repair oven (SN-07) are exhausted 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 following table contains the regulations applicable to this permit.

Table 2 - Regulations

Source No.	Regulation Citations
Facility	Regulation 18 - *Arkansas Air Pollution Control Code*
Facility	Regulation 19 - *Regulations of the Arkansas Plan of Implementation for Air Pollution Control*
Facility	Regulation 26 - *Regulations of the Arkansas Operating Air Permit Program*

Painting Processes	40 CFR 63 – *Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Metal Parts and Products* (January 2, 2007 Compliance Date).

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

Table 3 – Emission Summary

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
		PM	1.4	3.0	
		PM_{10}	1.4	3.0	
Total Allowable Emissions		SO_2	1.1	1.1	
		VOC	491.5	231.6	
		CO	1.6	5.2	
		NO_x	5.3	21.7	
HAPS*			488.5	230	
Facility	Paint Processes	VOC		230	
Facility	Paint Processes	HAPs*		230	
SN-01	Flash Off Area – Non-point Source	Deleted from the Permit - 2004			

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-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	
SN-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	
SN-06	#1 Touch-up Booth	Deleted from the permit - 2004			
SN-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	
SN-08	#2 Touch-Up Booth	Deleted from the permit - 2004			

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-09 SN-21	Main Baking Oven and Thermal Oxidizing System (gas combustion)	PM PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.2 0.6	0.4 0.4 0.1 0.2 0.6 2.7	
SN-09 SN-21	Main Baking Oven and Thermal Oxidizing System (paint process)	VOC HAP	9.1 9.1		
SN-12	#1 Repair Booth	VOC HAP	3.3 3.3		
SN-13	#2 Repair Booth	VOC HAP	3.3 3.3		
SN-14	Anodizing Burner (Tank #1)	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	

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-15	Anodizing Burner (Tank #3)	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	
SN-16	Anodizing Burner (Tank #18)	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	
SN-17	Anodizing Burner (Tank #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	
SN-18	Anodizing Burner (Tank #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	

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-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	
SN-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	
SN-21A	Thermal Oxidation System Bypass Stack	VOC HAP	468.2 468.2		
SN-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	
SN-23 SN-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	

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-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	
SN-26	Non-Point Source Emissions (Window Plant)	VOC HAP	2.0 2.0		
SN-27	Non-Point Sources (Anodizing)	Insignificant Activity			

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.
**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

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

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

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/PM_{10} - 1.6 tpy, SO_2 - 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.

Permit No. 904-AOP-R1 was issued to Kawneer Company, Inc. on April 4, 2003. This permit modification was issued primarily to show that most of the paint processes were now enclosed in a total enclosure. Permit limits were: PM/PM_{10} – 3.0 tpy, SO_2 - 1.4 tpy, VOC – 231.6 tpy, CO - 5.2 tpy, NO_x – 21.7 tpy, and total HAP 230.0 tpy tpy.

Section IV: SPECIFIC CONDITIONS

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

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

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

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

SN-#	Pollutant	lb/hr	tpy
02	PM	0.1	0.3
22	PM	0.1	0.2

3. 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 4 and 5. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

4. 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 H_2S and that H_2S constitutes greater than 50% by weight of the sulfur by weight in the natural gas. [§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]

5. All aluminum introduced into the ovens shall be clean and free of any combustibles (oil, grease, etc.). [§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]

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

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

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

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

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

8. 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 9 and 10. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

9. 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 H_2S and that H_2S constitutes greater than 50% by weight of the sulfur by weight in the natural gas. [§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]

10. All metal introduced into the ovens shall be clean and free of any combustibles (oil, grease, etc.). [§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]

SN-12 and SN-23
Repair Booths

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

11. 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. [§19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E]

SN-#	Pollutant	lb/hr
12	VOC	3.3
13	VOC	3.3

12. 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. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-#	Pollutant	l/hr
12	HAP	3.3
13	HAP	3.3

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

13. 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. [§19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E]

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

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

Pollutant	lb/hr	tpy
PM	0.1	0.1

15. 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 16. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

16. 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 H_2S and that H_2S constitutes greater than 50% by weight of the sulfur by weight in the natural gas. [§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]

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

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

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

SN-#	Pollutant	lb/hr	tpy
17	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
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

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

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

19. 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 20. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

20. 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 H_2S and that H_2S constitutes greater than 50% by weight of the sulfur by weight in the natural gas. [§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]

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 records keeping requirements in this permit for these sources.

Specific Conditions

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

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

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

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

23. 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 24. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

24. 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 H_2S and that H_2S constitutes greater than 50% by weight of the sulfur by weight in the natural gas. [§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]

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 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. Based on informal test data, it is conservatively assumed that 10% of the total VOCs and HAPs are not captured due to the lower velocity through the conveyer openings.

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.

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

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

SN	Pollutant	lb/hr	tpy
09	PM_{10}	0.1	0.4

SN	Pollutant	lb/hr	tpy
	SO_2 VOC (Combustion) CO NO_x	0.1 0.1 0.2 0.6	0.1 0.2 0.6 2.7
21	VOC	9.1	
21A	VOC	468.2	

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

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

SN	Pollutant	lb/hr	tpy
09	PM	0.1	0.4
21	HAP	9.1	
21A	HAP	468.2	

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

27. 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. 28. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

28. The bed temperature at both ends of the oxidation system shall not fall below 1500EF while operating. [§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]
29. The permittee shall develop and institute a plan to monitor the capture enclosure to verify that it is continuously operated to maintain satisfactory capture efficiency within 180

days of the issuance of this permit. The permittee will develop a correlation between the 300 HP induction fan motor Hertz applied to the variable speed controller and the face velocity into the booths. The permittee shall continuously monitor the fan motor to verify that it is operating at or above the speed necessary for proper capture efficiency for the enclosure. [§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]

30. The permittee shall have an interlock between the fan motor speed and the automatic paint guns that prevents painting when the fan motor speed is lower than required for proper capture efficiency on the enclosure. [§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]

31. 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. [§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]

CAM Plan

32. 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. 28. [§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]

33. The temperature monitoring system which monitors the oxidation system shall be installed, calibrated and operated according to the manufacturer's specifications. [§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]

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

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

Pollutant	lb/hr	tpy
VOC	2.0	

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

35. The permittee shall not exceed the emission rates set forth in the following table at source SN-26. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
HAP	2.0	

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

Section V: COMPLIANCE PLAN AND SCHEDULE

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.

Section VI: PLANT WIDE CONDITIONS

1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No.19 §19.410(B) and 40 CFR Part 52, Subpart E]

3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No.19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

4. The permittee must provide: [Regulation No.19 §19.702 and/or Regulation No.18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

    a. Sampling ports adequate for applicable test methods;

    b. Safe sampling platforms;

    c. Safe access to sampling platforms; and

    d. Utilities for sampling and testing equipment.

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No.19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. The permittee 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. [§19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E]

8. 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. [§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]

9. The permittee shall maintain the appropriate MSDS sheets and standard mixing formulas on site in order to demonstrate compliance with Plantwide Condition 8. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]

10. 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. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]

11. 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. 7. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]

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

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
PM - Summation VOC in usage of primer coatings with the thermal oxidizer operating for month in lbs.
ΣVOC - 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 – 0.9 – constant - Capture efficiency for Top coatings and clear coatings
C - 0.9 - constant - Capture efficiency for primers
RB - Summation VOC in usage of repair coatings for month in lbs
H - 2000 - conversion constant for lbs/tons

12. 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. [§18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

13. 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. 7. [A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311]

MHE = [TC (A)(B) + TC (1.0 - B) + PM (A) (C) + PM (1.0 -C) + RB + 3HAP] / 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 – 0.9 - Capture efficiency for Top coatings and clear coatings
C - 0.9 - constant - Capture efficiency for primers
RB - Summation HAP in usage of repair coatings for month in lbs
H - 2000 - conversion constant for lbs/tons

14. 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. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

HAP TLV (mg/m^3)	Maximum Content (lb/gal)
7.170	8.0
2.690	3.0
0.897	1.0
0.090	0.1

15. 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. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

16. 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. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

17. The permittee shall submit an administratively complete permit application incorporating the permit changes necessary to comply with 40 CFR 63 – Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Metal Parts and Products prior to July 2, 2005. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Title VI Provisions

18. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]

    a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.

    b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.

    c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.

d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

19. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]

e. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

f. 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.

g. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.

h. 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.)

i. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.

j. 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.

20. 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.

21. 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.

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

Section VII:INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated February 19, 2004

Table 4 - Insignificant Activities

Description	Category
SN-27 - Anodizing Area	A-13
Two natural gas fired paint hook burn off ovens rated 0.5 MMBtu/hr	A-13

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

Section VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.[40 CFR 70.6(b)(2)]

2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]

3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation No. 26 §26.406]

4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]

    a. The date, place as defined in this permit, and time of sampling or measurements;

    b. The date(s) analyses performed;

    c. The company or entity performing the analyses;

    d. The analytical techniques or methods used;

    e. The results of such analyses; and

    f. The operating conditions existing at the time of sampling or measurement.

6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26 §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]

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

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. The permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include: [40 CFR 70.6(a)(3)(iii)(B), Regulation #26 §26.701(C)(3)(b), and Regulation #19 §19.601 and §19.602]

   a. The facility name and location,

   b. The process unit or emission source 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.

The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]

10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]

11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]

12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]

13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]

14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]

16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]

17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]

18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]

19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]

20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]

    a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

    b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;

    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

    d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]

    a. The identification of each term or condition of the permit that is the basis of the certification;

b. The compliance status;

c. Whether compliance was continuous or intermittent;

d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and

e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

22. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;

b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,

d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

23. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]