

ADEQ OPERATING AIR PERMIT

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

Permit No. : 904-AOP-R3

Renewal #1

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:

August 24, 2004 AND August 23, 2009

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates
Chief, Air Division

Date Modified

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List of Acronyms and Abbreviations

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	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Kawneer Company, Inc

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PERMIT NUMBER: 904-AOP-R3

FACILITY ADDRESS: 600 Kawneer Drive
Springdale, AR 72764

MAILING ADDRESS: P.O. Box 709
Springdale, AR 72764

COUNTY: Washington

CONTACT POSITION: Gregory Smith

TELEPHONE NUMBER: 479-756-2740

REVIEWING ENGINEER: Shawn Hutchings

UTM North South (Y): Zone 15: 3995.9

UTM East West (X): Zone 15: 400.5

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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.

This modification incorporates the Surface Coating of Miscellaneous Metal Parts and Products MACT requirements into the permit. Emission rates for natural gas fired sources were updated based upon the most recent emission factors.

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 850 °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

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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.

A paint hook burn off oven is used to burn the paint off the hooks that carry the various parts through the painting lines. This oven is natural gas fired and has a rated capacity of 0.5 MMBTU/hr. This oven is 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. Emissions from the wall product fabrication are accounted for in the above listed sources. The non-point source emissions related to the use of adhesives and sealers from the window product fabrication are designated as source SN-26. Particulate emissions from the cutting, drilling, shearing, and stamping of parts are listed as an insignificant activity.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective May 28, 2006
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
40 CFR 63 – Subpart M – National Emission Standards for Hazardous Air Pollutants: Miscellaneous Metal Parts and Products.

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	1.4	2.3
		PM ₁₀	1.4	2.3
		SO ₂	1.4	1.4
		VOC	487.3	231.6
		CO	4.9	17.9
		NO _x	5.2	21.3
		HAPs*	485.9	230
SN	Description	Pollutant	lb/hr	tpy
SN-02	Log Oven	PM	0.1	0.2
		PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	0.1	0.2

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		CO	0.4	1.7
		NO _x	0.5	2.0
SN-03	Age Oven	PM	0.1	0.1
		PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.3	1.0
		NO _x	0.3	1.1
SN-07	Repair Bake Oven	PM	0.1	0.1
		PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.2
		NO _x	0.1	0.2
SN-09 SN-21	Main Baking Oven and Thermal Oxidizing System (gas combustion)	PM	0.1	0.2
		PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.6	2.2
		NO _x	0.6	2.7
SN-09 SN-21	Main Baking Oven and Thermal Oxidizing System (paint process)	VOC	9.1	230
		HAP	9.1	230
SN-12	#1 Repair Booth	VOC	3.3	
		HAP	3.3	
SN-13	#2 Repair Booth	VOC	3.3	
		HAP	3.3	
SN-21A	Thermal Oxidation System Bypass Stack	VOC	468.2	
		HAP	468.2	
SN-26	Non-Point Source Emissions (Window Plant)	VOC	2.0	
		HAP	2.0	
SN-14	Anodizing Burner (Tank #1)	PM	0.1	0.2
		PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.4	1.4
		NO _x	0.4	1.7

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SN-15	Anodizing Burner (Tank #3)	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.4 0.4	0.2 0.2 0.1 0.1 1.4 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 0.4 0.4	0.2 0.2 0.1 0.1 1.4 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 0.4 0.4	0.2 0.2 0.1 0.1 1.4 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 0.4 0.4	0.2 0.2 0.1 0.1 1.4 1.7
SN-19	Paint Room Burner (Tank #1)	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.3 0.3	0.1 0.1 0.1 0.1 1.2 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 0.3 0.3	0.1 0.1 0.1 0.1 1.0 1.1
SN-22	Log Oven	PM PM ₁₀ SO ₂ VOC	0.1 0.1 0.1 0.1	0.2 0.2 0.1 0.1

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		CO	0.3	1.3
		NO _x	0.4	1.6
SN-23	Age Oven	PM	0.1	0.2
SN-24		PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.3	1.3
		NO _x	0.4	1.6
SN-25	Paint Room Burner (Tank #5)	PM	0.1	0.1
		PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.3	1.0
		NO _x	0.3	1.1

*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.

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SECTION III: PERMIT HISTORY

Permit 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 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 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 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.

Permit 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/PM10 – 3.0 tpy, SO₂ - 1.4 tpy, VOC – 231.6 tpy, CO - 5.2 tpy, NO_x – 21.7 tpy, and total HAP 230.0 tpy.

Permit 904-AOP-R2 was issued on August 24, 2004. The facility installed an improved capture system on the painting system in their previous permit modification. The painting processes within the facility were unable to produce high quality production and efficiency at the air velocities generated at total capture. This permit modification allowed the facility to reduce air velocities, resulting in slightly reduced capture efficiency. The initial Title V permit renewal was also completed with the issuance of this permit. The painting processes at Kawneer Company, Inc. are subject to 40 CFR 63 – Subpart M – 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.

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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 4.5 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. Compliance with the emission rates will be demonstrated by compliance with Specific Conditions 4 and 5. [§19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control effective May 28, 2006, and 40 CFR Part 52, Subpart E]

SN-#	Pollutant	lb/hr	tpy
02	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.2
	CO	0.4	1.7
	NO _x	0.5	2.0
22	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.3	1.3
	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. Compliance with the emission rates will be demonstrated by compliance with Specific Conditions 4 and 5. [§18.801 of Regulation 18 effective February 15, 1999 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SN-#	Pollutant	lb/hr	tpy
02	PM	0.1	0.2
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 H₂S and that H₂S 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]

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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

6. The permittee shall not exceed the emission rates set forth in the following table at the designated sources. Compliance with the emission rates will be demonstrated by compliance with Specific Conditions 9 and 10. [§19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E]

SN-#	Pollutant	lb/hr	tpy
03	PM ₁₀	0.1	0.1
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.3	1.0
	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	0.3	1.3
	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. Compliance with the emission rates will be demonstrated by compliance with Specific Conditions 9 and 10. [§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	0.1
23/24	PM	0.1	0.2

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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 H₂S and that H₂S 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]

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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

11. The permittee shall not exceed the emission rates set forth in the following table. Compliance with the emission rates will be demonstrated by compliance with Specific Condition 14. [§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	0.2
NO _x	0.1	0.2

12. The permittee shall not exceed the emission rates set forth in the following table at the designated sources. Compliance with the emission rates will be demonstrated by compliance with Specific Condition 14. [§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

13. 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]
14. 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

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and that H₂S 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]

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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. Each 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

15. The permittee shall not exceed the emission rates set forth in the following table at the designated sources. Compliance with the emission rates will be demonstrated by compliance with Specific Condition 1814. [§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	0.4	1.4
	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	0.4	1.4
	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	0.4	1.4
	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	0.4	1.4

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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	0.4	1.4
	NO _x	0.4	1.7

16. The permittee shall not exceed the emission rates set forth in the following table at the designated sources. Compliance with the emission rates will be demonstrated by compliance with Specific Condition 1814. .[§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

17. 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]
18. 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. [§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]

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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 records keeping requirements in this permit for these sources.

Specific Conditions

19. The permittee shall not exceed the emission rates set forth in the following table at the designated sources. Compliance with the emission rates will be demonstrated by compliance with Specific Condition 22. [§19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E]

SN-#	Pollutant	lb/hr	tpy
19	PM ₁₀	0.1	0.1
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.3	1.2
	NO _x	0.3	1.4
20	PM ₁₀	0.1	0.1
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.3	1.0
	NO _x	0.3	1.1
25	PM ₁₀	0.1	0.1
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.3	1.0
	NO _x	0.3	1.1

20. The permittee shall not exceed the emission rates set forth in the following table at the designated sources. Compliance with the emission rates will be demonstrated by compliance with Specific Condition 22. [§18.801 of Regulation 18 and A.C.A. §8-4-203]

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as referenced by §8-4-304 and §8-4-311]

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

21. 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]
22. 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. [§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]

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SN-06, SN-08, SN-09, SN-12, SN-21, SN-23, SN-21A and SN-26

**Touch-up Booths, Bake Oven, Repair Booths, Oxidation System, Oxidation System Bypass
Stack and Window Plant**

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 Repair Booths (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 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.

Emissions from the Window Plant generated through the use of solvents, sealers, etc. which are used to prepare the aluminum components for final assembly are accounted for under SN-26. Particulate emissions from the cutting, drilling, shearing, and stamping of parts at the window plant are accounted for as an insignificant activity.

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23. The permittee shall not exceed the emission rates set forth in the following table. Compliance with the emission rates will be demonstrated by compliance with Specific Conditions 26, 27, 28, 30, and 31. [§19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
09	PM ₁₀	0.1	0.2
	SO ₂	0.1	0.1
	VOC (Combustion)	0.1	0.2
	CO	0.6	2.2
	NO _x	0.6	2.7
12	VOC	3.3	230
13	VOC	3.3	
21	VOC	9.1	
21A	VOC	468.2	
26	VOC	2.0	

24. The permittee shall not exceed the emission rates set forth in the following table. Compliance with the emission rates will be demonstrated by compliance with Specific Conditions 26, 27, and 28. [§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	0.2
12	HAP	3.3	230
13	HAP	3.3	
21	HAP	9.1	
21A	HAP	468.2	
26	HAP	2.0	

25. 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 26. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-

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26. The bed temperature at both ends of the oxidation system shall not fall below 1500°F while operating. This temperature need not be maintained while the oxidation system is operating in bypass mode as allowed in Specific Condition 29. [§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]
27. 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]
28. 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. The permittee need not operate the interlock while the oxidation system is operating in bypass mode as allowed in Specific Condition 29. [§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]
29. 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

30. 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 26. Except for monitoring malfunctions, associated repairs and required quality assurance or control activities (maintenance and calibration checks), the permittee shall monitor the temperature of the oxidation system continuously. [§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]

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31. 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]

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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: PLANTWIDE CONDITIONS

1. The permittee shall 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 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §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 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 shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 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 19, §19.702 and/or Regulation 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 shall maintain the equipment in good condition at all times. [Regulation 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 26 and A.C.A. §8-4-203 as referenced by A.C.A. §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]

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

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.

$\sum$ VOC - 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]

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

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.
- $\sum HAP$ - 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

HAP TLV (mg/m ³)	Maximum Content (lb/gal)
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 §8-4-31]

Subpart MMMM MACT Requirements

17. The permittee shall limit HAP emissions to the atmosphere from all coating operations at the facility to an average of 27.5 (lb/HAP)/lb solids in any consecutive 12 month period. [Regulation 19, §19.702 and 40 CFR Part 63.3890]
18. All coatings applied at the facility must meet the definition of high performance architectural coatings as defined in 63.3981 and meet the specifications of Architectural Aluminum Manufacturer's Association's publication number AAMA 605.2-2000. 63.3890(c)(2). [Regulation 19, §19.702 and 40 CFR Part 63.3890]
19. The permittee must submit a notification of compliance status no later than 30 days after the end of the initial compliance period. This notification must contain the information specified in 63.3910(c). [Regulation 19, §19.702 and 40 CFR Part 63.3910]
20. The permittee must submit semiannual compliance reports which include all information specified in 63.3920. The first semiannual report is not due till 6 months after the initial compliance period. [Regulation 19, §19.702 and 40 CFR Part 63.3920]
21. The permittee shall maintain records which consist of a copy of each notification of compliance and report that the facility submitted and the documentation supporting each notification and report. [Regulation 19, §19.702 and 40 CFR Part 63.3930]
22. The permittee shall maintain records which consist of a current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction for each coating. [Regulation 19, §19.702 and 40 CFR Part 63.3930]
23. The permittee must maintain records for each compliance period. These records must include: (1) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used. (2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of Sec. 63.3941. (3) For the emission rate without add-on controls option, a record of the calculation of the total mass of

organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of Sec. 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Sec. 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of Sec. 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of Sec. 63.3951. [Regulation 19, §19.702 and 40 CFR Part 63.3930]

24. The permittee shall maintain records which include: (1) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee is using the compliant material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used. (2) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. (3) A record of the volume fraction of coating solids for each coating used during each compliance period. (4) If the permittee uses either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period. (5) The permittee must keep records of the date, time, and duration of each deviation. [Regulation 19, §19.702 and 40 CFR Part 63.3930]
25. If the permittee uses an allowance in Equation 1 of Sec. 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to Sec. 63.3951(e)(4), the permittee must keep records of the information: (1) The name and address of each TSDF to which you sent waste materials for which were used as an allowance in Equation 1 of Sec. 63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment. (2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the allowance for these materials in Equation 1 of Sec. 63.3951 were used. (3) The methodology used in accordance with Sec. 63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [Regulation 19, §19.702 and 40 CFR Part 63.3930]
26. The permittee must maintain the records in Specific Conditions 21-25 for 5 years after the date of occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record on-site for at least 2 years. Records may be kept offsite for the remaining 3 years. Records must be in a form suitable and readily available for expeditious review, according to Sec. 63.10(b)(1). Where appropriate, the

records may be maintained as electronic spreadsheets or as a database. [Regulation 19, §19.702 and 40 CFR Part 63.3931]

27. In order to demonstrate initial compliance with the emission limits of Subpart Mmmm outlined in Specific Condition 16, the permittee must: Determine the mass fraction of organic HAP of each coating, the volume fraction of coating solids of each coating, the density of each material, the HAP content of each coating, the volume of each material used, the total volume of coating solids, and the organic HAP emission rate. For specifics on how to determine each item refer to 63.3951 The organic HAP emission limit calculated must be less than the applicable emission limit outlined in Plantwide Condition 17. [Regulation 19, §19.702 and 40 CFR Part 63.3951]
28. To demonstrate continuous compliance the permittee must calculate the HAP emission rate for each compliance period as specified in Specific Condition 27 and 63.3952 and maintain records required in Specific Conditions 21-25. Compliance must be demonstrated each month on a 12 month rolling basis. If the HAP emission rate for any compliance period exceeds the applicable limit, this is a deviation and must be reported as with the Notification of Compliance or the semiannual reports required in Plantwide Conditions 19 and 20. [Regulation 19, §19.702 and 40 CFR Part 63.3951]

SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 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.

Description	Category
SN-27 - Anodizing Area	A-13
natural gas fired paint hook burn off oven rated 0.5 MMBtu/hr	A-13
Window Plant - cutting, drilling, shearing, and stamping	A-13

SECTION VIII: GENERAL PROVISIONS

1. 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. [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 September 26, 2002]
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 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 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 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 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 Regulation 26, §26.701(C)(3)(a)]

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

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19, § 19.601), 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:
 - i. The facility name and location
 - ii. The process unit or emission source deviating from the permit limit,
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs,
 - iv. The date and time the deviation started,
 - v. The duration of the deviation,
 - vi. The average emissions during the deviation,
 - vii. The probable cause of such deviations,
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - ix. The name of the person submitting the report.

The permittee shall 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.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

- 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), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §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 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 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 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 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 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 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 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 26, §26.701(H)]
 17. If the permit allows 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 operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 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 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 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 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 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 shall 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 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;
 - e. and 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 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 A.C.A. §8-4-304 and §8-4-311]

APPENDIX A

