November 16, 2026

Via email to: asherrill@arkpoly.com & First Class Mail

Andrew Sherill
Director of Safety & Compliance
Arkansas Poly & Printing, LLC
1248 South 28th Street
Van Buren, AR 72956

Re: Notice of Final Permitting Decision; Permit No. 1331-AOP-R9

Dear Dr. Sherill,

After considering the application, any public comments, and other applicable materials as required by APC&EC 8 CAR § 11-211 and Ark. Code Ann. § 8-4-101 et seq., this notice of final permitting decision is provided for:

Arkansas Poly & Printing, LLC
1248 South 28th Street
Van Buren, AR 72956

Permit Number: 1331-AOP-R9

Permitting Decision: approval with permit conditions as set forth in final Permit No. 1331-AOP-R9

Accessing the Permitting Decision and Response to Comments, if any:
https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/1331-AOP-R9.pdf.

Accessing the Statement of Basis:
https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/1331-AOP-R9-SOB.pdf.

The permitting decision is effective on the date stated in the attached Certificate of Service unless a Commission review has been properly requested under Arkansas Pollution Control & Ecology Commission's Administrative Procedures, 8 CAR pt. 11, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Subpart 6 of 8 CAR pt. 11. Such a request shall be in the form and manner required by 8 CAR § 11-603, including filing a written Request for Hearing with the

Commission secretary at 3800 Richards Rd, North Little Rock, Arkansas 72117. If you have any questions about filing the request, please call the Commission at 501-682-7890.

This permit is your authority to construct, operate, and maintain the equipment and control apparatus as set forth in your application initially received on 6/10/2026.

Sincerely,



Demetria Kimbrough
Deputy Director, Office of Air Quality

Enclosure: Certificate of Service

CERTIFICATE OF SERVICE

I, Natasha Oates, hereby certify that the final permit decision notice has been mailed by first class mail to Arkansas Poly & Printing, LLC, 1248 South 28th Street, Van Buren, AR, 72956, on this 16th day of November , 2026.

Natasha Oates

Natasha Oates, Program Coordinator, Permits, Office of Air Quality

DIVISION OF ENVIRONMENTAL QUALITY

OPERATING AIR PERMIT

PERMIT NUMBER: 1331-AOP-R9

IS ISSUED TO:
Arkansas Poly & Printing, LLC
1248 South 28th Street
Van Buren, AR 72956
Crawford County
AFIN: 17-00100

PURSUANT TO THE RULES OF THE ARKANSAS OPERATING AIR PERMIT PROGRAM, 8 CAR PT. 42: 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:

November 16, 2026 AND November 15, 2031

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

Signed:

Demetria Kimbrough
Deputy Director, Office of Air Quality

November 16, 2026
Date

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List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	Arkansas DEQ Facility Identification Number
CAR	Code of Arkansas Rules
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
HAP	Hazardous Air Pollutant
Hp	Horsepower
lb/hr	Pound Per Hour
NESHAP	National Emission Standards (for) Hazardous Air Pollutants
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO_x	Nitrogen Oxide
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate Matter Equal To Or Smaller Than Ten Microns
$PM_{2.5}$	Particulate Matter Equal To Or Smaller Than 2.5 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

SECTION I: FACILITY INFORMATION

PERMITTEE:	Arkansas Poly & Printing, LLC
AFIN:	17-00100
PERMIT NUMBER:	1331-AOP-R9
FACILITY ADDRESS:	1248 South 28th Street Van Buren, AR 72956
MAILING ADDRESS:	1248 South 28th Street Van Buren, AR 72956
COUNTY:	Crawford County
CONTACT NAME:	Andrew Sherill
CONTACT POSITION:	Director of Safety & Compliance
TELEPHONE NUMBER:	(479) 383-8788
REVIEWING ENGINEER:	Kyle Bygness
UTM North South (Y):	Zone 15: 3920241.83 m
UTM East West (X):	Zone 15: 379264.74 m

SECTION II: INTRODUCTION

Summary of Permit Activity

Arkansas Poly, Inc. is a manufacturer of printed and unprinted polyethylene film and bags located at 1248 South 28th Street Van Buren, Crawford County, Arkansas 72956. This application is to renew their permit. There were no equipment or emissions changes in this renewal. Empty Drums (A-6) and Stick Welding (A-7) were added as insignificant activities.

Process Description

Poly Process

The polyethylene resin pellets are pneumatically conveyed to a feed hopper mounted at the throat of an extruder machine. The extruder heats the polyethylene pellets to a drawable consistency then forces it through a circular die where it is drawn very thin and formed into a tubular shape, film. The polyethylene film is air cooled, collapsed, and wound onto a roll. Polyethylene film is shipped direct to customers as a finished product, sent to the Press Department, or sent to the Converting Department where film is heat sealed into individual bags.

Printing Process

Unprinted polyethylene film is treated (exposed to a high voltage arc) before it is rolled up and sent through one of the printing presses (SN-01, SN-07, or SN-11). Two of the presses (SN-01 or SN-11) can apply several colors to the surface of the film. Between each color, the between color natural gas-fired dryers (SN-02 & SN-12) apply heated air to the ink to dry the ink surface before the next color is applied. The inks contain solvents that evaporate upon heating. After the final ink color is applied; the material passes through the final drying tunnel (SN-03 & SN-13) where the remaining solvent is evaporated from the ink. The material is rewound on a roll and sent to the customer.

To maximize the utilization of the larger printing equipment, some printing is done on an in-line printer (SN-07) that can apply a maximum of two colors. This inline printing is much slower and depends on the ambient air to dry the ink after it is applied. Some single-color printing is done in the extrusion department. The printing in the extrusion department is usually of average quality and typically consist of a warning statement such as “DANGER OF SUFFOCATION”. The film is extruded then fed through the in-line press where a one-color printed label can be applied. This allows us to extrude, print, and rewind the film in one process. To maximize the process further, some printing is done in the converting department. Film is unwound, fed through the in-line press where a maximum of two colors can be applied. The printing of instructions on the packaging makes it necessary for two colors. After the poly film has been printed on, it is then converted into bags in one continuous process. Printing in both of these departments is intended to free up capacity on the 8-color presses (SN-01 and SN-11).

Rules and Regulations

The following table contains the rules and regulations applicable to this permit.

Rules and Regulations
Arkansas Air Pollution Control Code, 8 CAR pt. 40, effective March 14, 2016
Rules of the Arkansas Plan of Implementation for Air Pollution Control, 8 CAR pt. 41, effective May 6, 2022
Rules of the Arkansas Operating Air Permit Program, 8 CAR pt. 42, effective March 14, 2016

Emission Summary

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				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	0.4	0.4
		PM_{10}	0.4	0.4
		$PM_{2.5}$	See Note*	
		SO_2	0.4	0.4
		VOC	536.3	249.4
		CO	0.4	0.6
		NO_X	0.5	1.4
HAPs		Single HAP Total HAPs	0.04 0.04	0.05 0.05
01	F&K 8-Color Flexographic Printing Press #1	VOC	166.0	249.0
07	Wolverine 2-Color Flexographic Inline Printing Press #2	VOC	1.7	
11	Bobst Vision CI MDF10271 Printing Press #2	VOC	368.2	

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
02	Natural gas-fired Dryer 0.720 MMBtu/hr (between SN-01)	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	0.1
		NO_X	0.1	0.4
		Single HAP	0.01	0.01
		Total HAPs	0.01	0.01
03	Natural gas-fired Dryer 1.350 MMBtu/hr (final SN-01)	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	0.2	0.6
		Single HAP	0.01	0.02
		Total HAPs	0.01	0.02
12	Natural gas-fired Dryer 0.444 MMBtu/hr (between SN-11)	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
		Single HAP	0.01	0.01
		Total HAPs	0.01	0.01
13	Natural gas-fired Dryer 0.267 MMBtu/hr (final SN11)	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	0.1
		NO_X	0.1	0.2
		Single HAP	0.01	0.01
		Total HAPs	0.01	0.01

*$PM_{2.5}$ limits are source specific, if required. Not all sources have $PM_{2.5}$ limits.

SECTION III: PERMIT HISTORY

Permit #1331-A was the initial permit for the facility it was issued on August 3, 1992.

Permit #1331-AR-1 was issued on December 7, 1992. This permit increased VOC emissions to 28 tons per year.

Permit #1331-AR-2 was issued on January 25, 1994. This permit included the installation of a new 6-color flexographic printing press.

Permit #1331-AR-3 was issued on May 5, 1995. This permitting action included adding a second flexographic printing press, two natural gas fired dryers, and a new color in-line press.

Permit #1331-AOP-R0 was issued on February 9, 1998. This was the initial Title V permit for the facility. There were no changes in the operations of the facility from the previous permit.

Permit #1331-AOP-R1 was issued on December 16, 1998. This permit allowed a press to be added to the facility and the rearrangement of some equipment.

Permit #1331-AOP-R2 was issued on October 21, 2002. This permit was the first Title V renewal for the facility. There were no physical modifications to the facility. VOC emissions from printing operations were recalculated at 249.0 tons per year.

Permit #1331-AOP-R3 was issued on June 18, 2007. This permit was the second Title V renewal for the facility. With this permit modification, the facility replaced 2 presses (SN-01, 02, and 03 the 6 color press, and SN-04, 05, and 06 the 4-color press) with a new 8 color press and made enhancements to the inline printing press, SN-07, to allow 2 colors to be applied. Emissions for this source did not change. With this modification, HAPs were removed from the permit.

Permit #1331-AOP-R4 was issued to Arkansas Poly, Inc. on June 18, 2012. This permit was the third Title V renewal permit for the facility. This modification contains no changes related to equipment, emissions, or methods. The total permitted annual emissions associated with this permit are: 0.4 tpy PM, 0.4 tpy PM10, 0.4 tpy SO2, 249.4 tpy VOC, 0.5 tpy CO and 2.0 tpy NOX. Materials used at this facility are HAP-free and therefore 40 CFR 63, Subpart KK does not apply.

Permit #1331-AOP-R5 was issued on May 16, 2013. This modification was necessary to remove the 6-Color Flexographic Printing Press #2 (SN-04) and its associated Dryers (SN-05 and SN-06), install a Schiavi 8-Color Flexographic Printing Press (SN-08) and its associated Dryers (SN-09 and SN-10), require that current MSDSs or equivalent documentation be maintained for each VOC containing material (inks and solvents) used at the facility, require documentation of all scrap VOCs poundage that are properly shipped off-site to a disposal facility and thus subtracted as a credit or allowance from the facility's VOC emissions, add Greenhouse Gas (GHG) Status,

and add Title VI Provisions. The total permitted annual emission change associated with this permit was: –0.4 tpy NOX.

Permit #1331-AOP-R6 was issued on January 17, 2017. During this permitting action, an A-3 insignificant activity was added (Solvent Storage Tanks). There were no other changes to this permit and no permitted annual emission changes.

Permit #1331-AOP-R7 was issued on December 2, 2021. During this permitting action, the recordkeeping requirements for the Printing Department were updated to be on a monthly basis instead of every 4-week basis. There were no equipment or emissions changes in this renewal.

Permit #1331-AOP-R8 was modified and issued on October 26th, 2023. During this permitting action, a printing press and two dryers (SN-08, SN-09, and SN-10) were removed and replaced with another printing press and two smaller dryers (SN-11, SN-12, and SN-13). Permitted emissions increased 0.1 tpy CO and decreased 0.2 tpy NO_X. The annual VOC limit for presses remained the same. Single and Total HAPs emissions from combustion sources were added.

SECTION IV: SPECIFIC CONDITIONS

SN-01, 07, 11 – Printing Department

Source Description

VOC emissions from the printing department are bubbled. Individual sources are the three printing presses which process various VOC-containing inks and solvents. Rolls of unprinted polyethylene are run through any of three printing presses (SN-01, SN-07, or SN-11) and rewound on the other end. Each press can apply several colors to the surface of the film. Between each color, the between-color dryers apply heated air to the ink to dry the ink surface before the next color is applied. The inks contain VOCs that evaporate upon heating. After the final ink color is applied, the material passes through the main drying tunnel where the remaining VOCs are evaporated from the ink. The material is rewound on a roll and sent to the customer.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #2. The annual tons per year VOCs emissions are bubbled. [8 CAR § 41-401 et seq. and 40 C.F.R. § 52 Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	F&K 8-Color Flexographic Printing Press #1 (model #16S-10)	VOC	166.0	249.0
07	Wolverine 2-Color Inline Flexographic Printing Press	VOC	1.7	
11	Bobst Vision CI MDF10271 Printing Press #2	VOC	368.2	

2. The permittee shall maintain records of the inks and solvents (VOC-containing materials) used in SN-01, SN-07 and SN-11 to demonstrate compliance with the VOC ton per year (tpy) limit of Specific Condition #**Error! Reference source not found.**. Current Safety Data Sheets (SDS) or equivalent documents for each ink or solvent used shall be maintained on-site and made available to Division personnel upon request to demonstrate compliance with this specific condition. The permittee shall update these records on a calendar monthly basis. Inventory records of solvent and ink usages may be used for this purpose as long as the calendar month coincides with the calendar month of the inventory. Inventory reports shall be updated within five business days following each inventory. After each calendar month, the total VOC emitted over the last thirteen

consecutive months shall be determined. Twelve (12) consecutive month periods shall be deemed to show compliance with the ton per year VOC limits for the Printing Department. Any scrap VOCs that are properly shipped off-site according to the terms of Specific Condition #3 may be subtracted from the total VOC emissions as a credit or allowance. The permittee must take into account VOC percent content of the scrap solvent adjusting for solids and non-VOC content. The twelve consecutive months' total and each individual month's data shall be maintained in a spreadsheet, database, or other well-organized format on-site, made available to Division personnel upon request and submitted in accordance with General Provision 7. [8 CAR § 41-605 and 40 C.F.R. § 52 Subpart E]

3. The permittee may use all scrap VOCs that are contained and properly shipped off-site to a disposal site as a credit or allowance towards the facility's VOC emissions. Only the VOC portion of the shipment may be taken as a credit. Before a credit may be taken, the following conditions must be met: [8 CAR § 41-605 and Ark. Code Ann. § 8-4-203 as referenced by §§ 8-4-304 and 8-4-311]

    a. Testing shall be performed quarterly in order to establish representative concentrations by percentage of VOCs from the waste product. This testing shall be performed by an independent laboratory. Representative samples shall be taken from bulk storage containers, containing scrap VOC materials. The independent laboratory shall test using Method 24 for percentage of VOC content by weight and report as such. The average of the samples may be applied to all VOC poundage disposed of for the next quarter.
    b. The Division Inspector shall be notified no later than seven calendar days prior to the date the samples are to be taken. The Inspector shall have the option of attending the sampling and selecting the bulk containers to be sampled.
    c. The sampling reports shall be maintained on-site with the VOC emission records required by this permit. These records shall be made available to Division personnel upon request.
    d. The permittee shall maintain a twelve consecutive month total and each individual month's data shall be maintained in a spreadsheet, database, or other well-organized format on-site and made available to Division personnel upon request.

4. The printers are not permitted to emit any HAPs. The permittee shall maintain records including current Safety Data Sheets (SDS) or equivalent documents for any ink or solvent used at the facility to demonstrate compliance with this condition. [8 CAR § 40-701 and Ark. Code Ann. § 8-4-203 as referenced by §§ 8-4-304 and 8-4-311]

SN-02, 03, 12, and 13 – Natural Gas-Fired Dryers

Source Description

Between the application of each color, natural gas-fired dryers, SN-02 on the F&K 8-color Press #1 (SN-01) and SN-12 on the Bobst Vision CI MDF10271 Printing Press #2 (SN-11), apply heated air to the ink to dry the ink surface before the next color is applied. The inks contain solvents (VOCs) that evaporate upon heating. After the final ink color is applied, the film passes through the final (main) drying tunnel (SN-03 on SN-01 and SN-13 on SN-11) where the remaining solvent is evaporated from the ink. The VOC emissions from the inks are accounted for at the presses.

Specific Conditions

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by combustion of pipeline quality natural gas as the only fuel, Specific Condition #8, and by operating at or less than maximum capacity of the equipment. [8 CAR § 41-401 et seq. and 40 C.F.R. § 52 Subpart E]

SN	Description	Pollutant	lb/hr	tpy
02	Natural gas-fired Dryer 0.720 MMBtu/hr (between SN-01)	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	0.4
03	Natural gas-fired Dryer 1.350 MMBtu/hr (final SN-01)	PM_{10}	0.1	0.1
		SO_2	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.2
		NO_X	0.2	0.6
12	Natural gas-fired Dryer 0.444 MMBtu/hr (between SN-11)	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
13	Natural gas-fired Dryer 0.267 MMBtu/hr (final SN-11)	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

6. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by combustion of pipeline

quality natural gas as the only fuel, Specific Condition #8, and by operating at or less than maximum capacity of the equipment. [8 CAR § 40-701 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
02	Natural gas-fired Dryer 0.720 MMBtu/hr (between SN-01)	PM Single HAP Total HAPs	0.1 0.01 0.01	0.1 0.01 0.01
03	Natural gas-fired Dryer 1.350 MMBtu/hr (final SN-01)	PM Single HAP Total HAPs	0.1 0.01 0.01	0.1 0.02 0.02
12	Natural gas-fired Dryer 0.444 MMBtu/hr (between SN-11)	PM Single HAP Total HAPs	0.1 0.01 0.01	0.1 0.01 0.01
13	Natural gas-fired Dryer 0.267 MMBtu/hr (final SN-11)	PM Single HAP Total HAPs	0.1 0.01 0.01	0.1 0.01 0.01

7. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
02, 03, 12, & 13	5%	8 CAR § 40-401

8. The permittee shall use only pipeline quality natural gas as fuel in the dryers, SN-02, 03, 12 and 13. Emissions from the natural gas-fired equipment have been calculated at full load for continuous operation and no recordkeeping is required. [8 CAR § 41-605 and Ark. Code Ann. § 8-4-203 as referenced by §§ 8-4-304 and 8-4-311]

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Arkansas Poly & Printing, LLC will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future rules and 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. [8 CAR § 41-604 and 40 C.F.R. § 52 Subpart E, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [8 CAR § 41-310(b) and 40 C.F.R. § 52 Subpart E]

3. The permittee must test any equipment scheduled for testing, unless otherwise 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 startup of the permitted source or (2) operating equipment according to the time frames set forth by the Division of Environmental Quality or within 180 days of permit issuance if no date is specified. The permittee must notify the Division of Environmental Quality of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee shall submit the compliance test results to the Division of Environmental Quality within sixty (60) calendar days after completing the testing. [8 CAR § 41-602 and/or 8 CAR § 40-902 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

4. The permittee must provide:

    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.

    [8 CAR § 41-602 and/or 8 CAR § 40-902 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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. [8 CAR § 41-203 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

6. This permit subsumes and incorporates all previously issued air permits for this facility. [8 CAR § 42and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

7. Unless otherwise specified in the permit, approval to construct any new major stationary source or a major modification subject to 40 C.F.R. § 52.21 shall become invalid if construction is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Division of Environmental Quality may extend the 18-month period upon a satisfactory showing that an extension is justified. [8 CAR § 41-801 et seq. and 40 C.F.R. § 52 Subpart E]

Title VI Provisions

8. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 C.F.R. § 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.

9. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 C.F.R. § 82 Subpart F]

    a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
    b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
    c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
    d. Persons disposing of small appliances, MVACs, and MVAC like appliances must comply with record keeping requirements pursuant to § 82.166. ("MVAC like appliance" as defined at § 82.152)
    e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.156.
    f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

10. 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 C.F.R. § 82 Subpart A, Production and Consumption Controls.

11. 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 C.F.R. § 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.

12. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 C.F.R. § 82 Subpart G.

SECTION VII: INSIGNIFICANT ACTIVITIES

The Division of Environmental Quality deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in 8 CAR pt. 40 and pt. 41 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated March 31, 2026. [8 CAR § 42-204 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
Solvent Storage Tanks (2100 Gallons)	A-3
Empty Drums (approx. 10-15 empty drums may be on site at a time)	A-6
Stick Welding (SMAW): Estimated at less than 5 lbs of rods	A-7

SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission 8 CAR pt. 40 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 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 8 CAR pt. 40 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission 8 CAR pt. 40 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 C.F.R. § 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 C.F.R. § 70.6(a)(2) and 8 CAR § 42-601(2)]

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 Division of Environmental Quality takes final action on the renewal application. The Division of Environmental Quality will not necessarily notify the permittee when the permit renewal application is due. [8 CAR § 42-306]

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 C.F.R. § 70.6(a)(1)(ii) and 8 CAR § 42-601(1)(C)]

5. The permittee must maintain the following records of monitoring information as required by this permit.

    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.

    [40 C.F.R. § 70.6(a)(3)(ii)(A) and 8 CAR § 42-601(3)(C)]

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 C.F.R. § 70.6(a)(3)(ii)(B) and 8 CAR § 42-601(3)(C)(ii)]

7. The permittee must submit reports of all required monitoring every six (6) months. If the permit establishes no other reporting period, the reporting period shall end on the last day of the month six months after the issuance of the initial Title V permit and every six months thereafter. The report is due on the first day of the second month after the end of the reporting period. The first report due after issuance of the initial Title V permit shall contain six months of data and each report thereafter shall contain 12 months of data. The report shall contain data for all monitoring requirements in effect during the reporting period. If a monitoring requirement is not in effect for the entire reporting period, only those months of data in which the monitoring requirement was in effect are required to be reported. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in 8 CAR § 42-104 must certify all required reports. The permittee will send the reports electronically using https://eportal.adeq.state.ar.us or mail them to the address below:

   Division of Environmental Quality
   Office of Air Quality
   ATTN: Compliance Inspector Supervisor
   5301 Northshore Drive
   North Little Rock, AR 72118-5317

   [40 C.F.R. § 70.6(a)(3)(iii)(A) and 8 CAR § 42-601(3)(D)(i)]

8. The permittee shall report to the Division of Environmental Quality all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.

   a. For all upset conditions (as defined in 8 CAR § 41-501), the permittee will make an initial report to the Division of Environmental Quality 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 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 Division of Environmental Quality 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.

[8 CAR § 41-501, 8 CAR § 41-502, 8 CAR § 42-601(3)(D)(ii), and 40 C.F.R. § 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 Rule are declared to be separable and severable. [40 C.F.R. § 70.6(a)(5), 8 CAR § 42-601(5), and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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 8 CAR pt. 42 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 C.F.R. § 70.6(a)(6)(i) and 8 CAR § 42-601(6)(A)]

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 C.F.R. § 70.6(a)(6)(ii) and 8 CAR § 42-601(6)(B)]

12. The Division of Environmental Quality 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 C.F.R. § 70.6(a)(6)(iii) and 8 CAR § 42-601(6)(C)]

13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 C.F.R. § 70.6(a)(6)(iv) and 8 CAR § 42-601(6)(D)]

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 Division of Environmental Quality may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 C.F.R. § 70.6(a)(6)(v) and 8 CAR § 42-601(6)(E)]

15. The permittee must pay all permit fees in accordance with the procedures established in 8 CAR pt. 12. [40 C.F.R. § 70.6(a)(7) and 8 CAR § 42-601(7)]

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 C.F.R. § 70.6(a)(8) and 8 CAR § 42-601(8)]

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 C.F.R. § 70.6(a)(9)(i) and 8 CAR § 42-601(9)(B)(i)]

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 Division of Environmental Quality specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 C.F.R. § 70.6(b) and 8 CAR § 42-602(a) and (b)]

19. Any document (including reports) required by this permit pursuant to 40 C.F.R. § 70 must contain a certification by a responsible official as defined in 8 CAR § 42-104. [40 C.F.R. § 70.6(c)(1) and 8 CAR § 42-603(1)]

20. The permittee must allow an authorized representative of the Division of Environmental Quality, upon presentation of credentials, to perform the following: [40 C.F.R. § 70.6(c)(2) and 8 CAR § 42-603(2)]

    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. If the 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 on the first day of the second month after the end of the reporting period. The permittee must also submit the compliance certification to the Administrator as well as to the Division of Environmental Quality. All compliance certifications required by this permit must include the following: [40 C.F.R. § 70.6(c)(5) and 8 CAR § 42-603(5)(B)(iii)]

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 Division of Environmental Quality 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: [8 CAR § 42-604(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. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Division of Environmental Quality

approval. The Division of Environmental Quality may grant such a request, at its discretion in the following circumstances:

a. Such an extension does not violate a federal requirement;
b. The permittee demonstrates the need for the extension; and
c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[8 CAR § 40-214(a), 8 CAR § 41-316(a), 8 CAR § 42-913(a), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Division of Environmental Quality approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:

a. Such a request does not violate a federal requirement;
b. Such a request is temporary in nature;
c. Such a request will not result in a condition of air pollution;
d. The request contains such information necessary for the Division of Environmental Quality to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[8 CAR § 40-214(b), 8 CAR § 41-316(b), 8 CAR § 42-913(b), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Division of Environmental Quality approval. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:

a. The request does not violate a federal requirement;
b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[8 CAR § 40-214(c), 8 CAR § 41-316(c), 8 CAR § 42-913(c), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

27. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [8 CAR § 40-901, 8 CAR § 41-601, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]