OPERATING AIR PERMIT

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

Permit #: 1672-AOP-R0

IS ISSUED TO:

ACI - Coors Technical Ceramics Co. 3315 Boone Road Benton, AR 72015 Saline County CSN: 63-0164

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

and

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE: CSN:	ACI - Coors Technical Ceramics 63-0164
PERMIT NUMBER:	1672-AOP-R0
FACILITY ADDRESS:	3315 Boone Road, Benton, AR. 72015
COUNTY:	Saline
CONTACT NAME:	Ralph Wolford
TELEPHONE NUMBER:	501-778-6665
TECHNICAL CONTACT:	Chris Nelson
ADDRESS:	1100 Commerce Park Drive
TELEPHONE NUMBER:	Oak Ridge, Tennessee 37830 423-481-8021
REVIEWING ENGINEER:	Paul Osmon
UTM North-South (X):	3828.5
UTM East-West (Y):	541.5

SECTION II: INTRODUCTION

Coors Technical Ceramic (ACI) owns and operates a high tech ceramic manufacturing plant located at 3315 Boone Road, Benton, AR 72015.

The facility is classified under SIC code 3264. Operations at the facility consist of an alumina and silicon carbide department.

Alumina Process

Powder is delivered to a storage area and remains there until scheduled for pressing based on customer specifications and batch number. Once scheduled, the powder is pressed into machinable parts by either ISO press or dry press. Machined parts are then routed to either a tunnel kiln (SN-04 through SN-07) or a periodic kiln (SN-01 and SN-02) depending on the size of the part. Parts are inspected and routed to the wet grinding area to be machined to a final dimensional tolerance. Ground parts are lapped and polished for the customer required surface finish. After the polishing, the parts are inspected and acceptable parts are transported to the packaging area for inventory or immediate shipment to the customer.

Silicon Carbide Process

Raw materials are delivered to the storage area and remain there until scheduled for the spray dryer. Once scheduled, the material is blended into a slurry and sprayed into the spray dryer (SN-03) to form a powder. The powder is screened and stored in 55 gallon drums. The powder is pressed into machinable parts by a ISO press. Machined parts are then routed to a cure oven (SN-08) to remove moisture, binders, and de-wax. Cured parts are placed in a vacuum furnace (SN-08) with graphite and then heated to a preset temperature to form silicon carbon. Silicon carbide parts are sandblasted to remove scale from the sintering process. Parts are inspected and routed to the wet grinding area to be machined to a final dimensional tolerance. Ground parts are lapped and polished for the customer required surface finish. After the polishing, the parts are inspected and acceptable parts are transported to the packaging area for inventory or immediate shipment to the customer.

Permit No. 1672-AOP-R0 is the first operating air permit issued to ACI -Coors Technical Ceramics under Regulation 26. No physical changes in the method of operation at the facility occurred prompting this permit issuance. A summary of facility wide emissions is provided in the table below. Specific emission unit information is located at the indicated cross reference

page.

	EMISSION SUMMARY				
Source No.	Description	Pollutant	Emission Rates		Cross Reference
			lb/hr	tpy	Page
Total	Allowable Emissions	VOC NH ₃	24.3 0.3	101.2 0.1	
01	Kiln #3 Natural Gas (0.3 MMBTU/Hr.)	VOC	0.4	0.4	7
02	Kiln #4 Natural Gas (0.3 MMBTU/Hr.)	VOC	0.4	0.4	7
03	Spray Dryer	NH ₃	0.3	0.1	8
04	L-32 Tunnel Kiln Natural Gas (3.2 MMBTU)	VOC	11.1	48.6	7
05	L-30 Tunnel Kiln Natural Gas (3.2 MMBTU)	VOC	3.9	17.0	7
06	Harrop Tunnel Kiln Natural Gas (1.3 MMBTU)	VOC	3.9	17.0	7
07	Lindburgh Tunnel Kiln Natural Gas (1.3 MMBTU)	VOC	3.9	17.0	7
08	Cure Ovens & Vacuum Furnaces (electric)	VOC	0.7	0.8	9

SECTION III: PERMIT HISTORY

Permit No. 1671-A was the first permit issued to ACI on May 8, 1996. This permit established permitted emission limits at 3.0 tons per year PM/PM_{10} , 3.0 tons per year SO_2 , 104.1 tons per year VOC, 3.0 tons per year CO, 5.5 tons per year NO_x , 3.0 tons per year methane, and 0.1 tons per year NH_3 .

SECTION IV: EMISSION UNIT INFORMATION

SN-01 thru 02 and SN-04 thru 07 Ceramic Kilns

Source Description

SN-01 and SN-02 are batch ceramic kilns fired only with natural gas. SN-04 through SN-07 are natural gas fired continous ceramic kilns. All kilns are used to sinter small alumina oxide parts. Emissions consist of insignificant products of combustion of natural gas and remaining VOC from the products used as binders in the molding process that were not combusted in the sintering process. There are no significant HAPs in the binders and none are anticipated in the products of sintering.

Specific Conditions

1. Pursuant to \$19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. All hourly emission rates are based on the maximum capacity of the equipment. Yearly emissions are limited by Plantwide Condition No. 6.

SN-#	Pollutant	lb/hr	tpy
SN-01	VOC	0.4	0.4
SN-02	VOC	0.4	0.4
SN-04	VOC	11.1	48.6
SN-05	VOC	3.9	17.0
SN-06	VOC	3.9	17.0
SN-07	VOC	3.9	17.0

2. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall only use natural gas or LP gas as a fuel for these kilns.

SN-03

Spray Dryer

Source Description

Raw materials are blended and processed in the spray dryer. One of the blended materials is Colloidal Graphite Slurry. This raw material is 1% Ammonia Hydroxide which is emitted as ammonia from the dryer.

Specific Conditions

3. Pursuant to \$18.8 of the Regulations of the Arkansas Air Pollution Control Code, effective July 1, 1997 (Regulation 18), the permittee shall not exceed the emission rates set forth in the following table. The hourly emission rates are based on the maximum capacity of the equipment. Yearly emissions are limited by Specific Condition No. 4.

SN-#	Pollutant	lb/hr	tpy
SN-03	NH ₃	0.3	0.1

- 4. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, ACI shall not exceed 48 batches per year on a rolling 12-month period for the spray dryer (SN-03).
- 5. Pursuant to §18.10 of the Regulations of the Arkansas Air Pollution Control Code, effective July 1, 1997 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, compliance with Specific Condition No. 4 shall be verified by maintaining monthly records of the number of batches produced. Records shall be updated no later than the 15th day of the month following the month which the records represent. These records shall be kept on site and shall be made available to Department personnel upon request.

SN-08 Cure Ovens and Vacuum Furnaces

Source Description

Pressed machinable parts are routed to the cure ovens for removal of moisture, binders, and wax; The parts are then placed in a vacuum furnace with graphite and heated to a preset temperature to form silicon carbide.

Specific Conditions

6. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The hourly emission rates are based on the maximum capacity of the equipment. Yearly emissions are limited by Specific Condition No. 4.

SN-#	Pollutant	lb/hr	tpy
SN-08	VOC	0.7	0.8

SECTION V: PLANTWIDE CONDITIONS

- 1. Pursuant to \$19.4(o) of Regulation 19, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
- 2. Pursuant to §19.4(q) of Regulation 19, construction must commence within eighteen (18) months after the approval of the permit application. Records must be kept for two years which will enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset condition, and continuous monitoring data. The records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.
- 3. Pursuant to §19.7 of Regulation 19, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing. The permittee shall provide:
 - (1) Sampling ports adequate for applicable test methods
 - (2) Safe sampling platforms
 - (3) Safe access to sampling platforms
 - (4) Utilities for sampling and testing equipment
- 4. Pursuant to A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
- 5. Pursuant to Regulation 26 and §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall supersede and void all previously issued air permits for this facility.

6. Pursuant to §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee is limited to the following binder usage for a rolling 12 month period:

Chemical Name/ Usage Rate	Polyox - WSRN80 - Poly(ethylene oxide)	Carbowax - (polyethylene glycol)	Comprex BPO - hydrotreated mineral base oil	Kerosene
Pounds/Year	6,515	61,824		
Gallons/Year			870	870

The permittee may use other chemicals for binders replacing the above chemicals on a pound per pound basis if they contain no HAPs.

- 7. Pursuant to §19.7 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Plantwide Condition 6 and may be used by the Department for enforcement purposes. The 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. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision 7. The first submittal shall be due February 1, 1999, and shall include data from the months January, 1998 through December, 1998.
- 8. Pursuant to §18.8 of the Regulations of the Arkansas Air Pollution Control Code, effective July 1, 1997 (Regulation 18), the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation#18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.
- 9. Pursuant to \$18.9 of the Regulations of the Arkansas Air Pollution Control Code, effective July 1, 1997 (Regulation 18), the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants from becoming airborne.

10. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall maintain a pressure drop measurement device on each baghouse. The pressure drop shall be maintained between 2 inches of H_2O and 4 inches of H_2O . The pressure drop shall be checked at a minimum of once per week. When the pressure drop is below 2 inches of H_2O or above 4 inches of H_2O , the permittee shall clean or replace the bag filters. The permittee shall maintain records of pressure drop and maintenance. Records shall be kept on site and provided to Department personnel upon request

Title VI Provisions

- 11. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - A. All containers containing a class I or class II substance is 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 interstate commerce pursuant to \$82.106.
 - B. The placement of 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.
- 12. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, excepts as provided for MVACs in Subpart B:
 - A. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - B. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - C. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.

- D. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)
- E. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
- F. Owners/operators of appliances normally containing 50 or m ore pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 13. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, subpart A, Production and Consumption Controls.
- 14. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

SECTION VI: DE MINIMIS EMISSION SOURCES

Pursuant to §26.3(d) of Regulation 26, the following sources are below the *de minimis* emission levels. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not *demiminis*, even if this activity meets the criteria of §3(e) of Regulation 26 or is listed below. *De minimis* emission determinations rely upon the information submitted by the permittee in an application dated June 10, 1997.

- natural gas fired kilns with a design heat rate of less than 10 million BTU per hour and less than 5 tons per year aggregate emissions.

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be below the deminimis emission levels. Activities included in this list are allowable under this permit and need not be specifically identified.

- 1. Natural gas-burning equipment with a design rate less than 1 million BTU per hour.
- 2. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emission from loading racks or fueling operations covered under any applicable federal requirements.
- 3. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
- 4. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.
- 5. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
- 6. Consumer use of office equipment and products, not including commercial printers or businesses primarily involved in photographic reproduction.
- 7. Janitorial services and consumer use of janitorial products.

- 8. Internal combustion engines used for landscaping purposes.
- 9. Laundry activities, except for dry-cleaning and steam boilers.
- 10. Bathroom/toilet emissions.
- 11. Emergency (backup) electrical generators at residential locations.
- 12. Tobacco smoking rooms and areas.
- 13. Blacksmith forges.
- 14. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
- 15. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.¹
- 16. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface coating or products.
- 17. Portable electrical generators that can be "moved by hand" from one location to another.²
- 18. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.

¹ Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

²"Moved by hand" means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

- 19. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.³
- 20. Air Compressors and pneumatically operated equipment, including hand tools.
- 21. Batteries and battery charging stations, except at battery manufacturing plants.
- 22. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.⁴
- 23. Containers of less than or equal to 5 gallons in capacity that do not emit any detectable VOCs or HAPs when closed. This includes filling, blending, or mixing of the contents of such containers by a retailer.
- 24. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
- 25. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solution, provided appropriate lids and covers are used and appropriate odor control is achieved.
- 26. Drop hammers or presses for forging or metalworking.
- 27. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
- 28. Vents from continuous emission monitors and other analyzers.
- 29. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

³Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately.

⁴Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

- 30. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.
- 31. Equipment used for surface coating, painting, dipping, or spraying operations, containing less than 0.4 lb/gal VOCs, has no hexavalent chromium, and emits no more than 0.1 tpy of all other HAPs.
- 32. Lasers used only on metals and other materials which do not emit HAPs in the process.
- 33. Consumer use of paper trimmers/binders.
- 34. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boiler delivering the steam.
- 35. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
- 36. Laser trimmers using dust collection to prevent fugitive emissions.
- 37. Bench-scale laboratory equipment used for physical or chemical analysis.
- 38. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
- 39. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
- 40. Hydraulic and hydrostatic testing equipment.
- 41. Environmental chambers not using hazardous air pollutant gases.
- 42. Shock chambers, humidity chambers and solar simulators.
- 43. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
- 44. Process water filtration systems and demineralizers.

- 45. Demineralized water tanks and demineralizer vents.
- 46. Boiler water treatment operations, not including cooling towers.
- 47. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.
- 48. Oxygen scavenging (de-aeration) of water.
- 49. Ozone generators.
- 50. Fire suppression systems.
- 51. Emergency road flares.
- 52. Steam vents and safety relief valves.
- 53. Steam leaks.
- 54. Steam cleaning operations.
- 55. Steam and microwave sterilizers.
- 56. Site assessment work to characterize waste disposal or remediation sites.
- 57. Miscellaneous additions or upgrades of instrumentation.
- 58. Emissions from combustion controllers or combustion shutoff devices.
- 59. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units or such vehicles (i.e. antifreeze, fuel additives).
- 60. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
- 61. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
- 62. Residential wood heaters, cookstoves, or fireplaces.

- 63. Barbecue equipment or outdoor fireplaces used in conjunction with any residential or recreational use.
- 64. Log wetting areas and log flumes.
- 65. Periodic use of pressurized air for cleanup.
- 66. Solid waste dumpsters.
- 67. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.
- 68. Natural gas odoring activities unless the Department determines that a nuisance may occur.
- 69. Emissions from engine crankcase vents.
- 70. Storage tanks used for the temporary containment of materials resulting from an emergency reporting of an unanticipated release.
- 71. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
- 72. Mixers, blenders, roll mills, or calenders for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.
- 73. The storage, handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to equipment only).
- 74. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
- 75. Tall oil soap storage, skimming, and loading.
- 76. Water heaters used strictly for domestic (non-process) purposes.
- 77. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.

78. Agricultural operations, including onsite grain storage.

SECTION VII: GENERAL PROVISIONS

- 1. Pursuant to 40 C.F.R. 70.6(b) (2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 as the 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 as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
- 2. Pursuant to 40 C.F.R. 70.6(a) (2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
- 3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
- 4. Pursuant to 40 C.F.R. 70.6(a) (1) (ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an

applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.

- 5. Pursuant to 40 C.F.R. 70.6(a) (3) (ii) (A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed 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. Pursuant to 40 C.F.R. 70.6(a) (3) (ii) (B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
- 7. Pursuant to 40 C.F.R. 70.6(a) (3) (iii) (A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required

reports must be certified by a responsible official as defined in \$26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Pollution Control and Ecology Air Division ATTN: Compliance Inspector Supervisor Post Office Box 8913 Little Rock, AR 72219

- 8. Pursuant to 40 C.F.R. 70.6(a) (3) (iii) (B), §26.7 of Regulation #26, and §19.6 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department within 24 hours of discovery of the occurrence. The initial report may be made by telephone and shall include:
 - a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,
 - e. The duration of the deviation,
 - f. The average emissions during the deviation,
 - g. The probable cause of such deviations,
 - h. Any corrective actions or preventive measures taken or being take to prevent such deviations in the future, and
 - i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may

submit a full report in writing (by facsimile, overnight courier, or other means) within 24 hours of discovery of the occurrence and such report will serve as both the initial report and full report.

- 9. Pursuant to 40 C.F.R. 70.6(a) (5) and §26.7 of Regulation #26, and A.C.A.§8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
- 10. Pursuant to 40 C.F.R. 70.6(a) (6) (i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- 11. Pursuant to 40 C.F.R. 70.6(a) (6) (ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 12. Pursuant to 40 C.F.R. 70.6(a) (6) (iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- 13. Pursuant to 40 C.F.R. 70.6(a) (6) (iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.

- 14. Pursuant to 40 C.F.R. 70.6(a) (6) (v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
- 15. Pursuant to 40 C.F.R. 70.6(a) (7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
- 16. Pursuant to 40 C.F.R. 70.6(a) (8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
- 17. Pursuant to 40 C.F.R. 70.6(a) (9) (i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
- 18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

- Pursuant to 40 C.F.R. 70.6(c) (1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
- 20. Pursuant to 40 C.F.R. 70.6(c) (2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
- 21. Pursuant to 40 C.F.R. 70.6(c) (5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;

- d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
- e. Such other facts as the Department may require elsewhere in this permit or by §114 (a) (3) and 504 (b) of the Act.
- 22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

APPENDIX A

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SOURCE NO. & DESCRIPTION	Polyox WSRN- 80	Carbowax	Comprex BPO	Kerosene
DESCRIPTION	(Lbs/Day)*	(Lbs/Day)*	(Lbs/Day)*	(Lbs/Day)*
SN-01 - Kiln No. 3	0.24	0.31		
SN-02 - Kiln No. 4	0.24	0.31		
SN-03 - Spray Dryer				
SN-04 - L-32 Kiln		145.6	16.2	16.2
SN-05 - L-30 Kiln	5.79	7.72		
SN-06 - Harrop Kiln	5.79	7.72		
SN-07 - Lindburgh Kiln	5.79	7.72		
SN-08 - Cure Ovens & Vacuum Furnaces				
TOTAL - Lbs/Day	17.85	169.38	16.2	16.2
TOTAL - Lbs/Year	6,515.	61,824.	5,913	5,913
TOTAL - Gal/Year			810	810

YEARLY MATERIAL USAGES

* - Material Rate Submitted in Permittees Material Balance Calculations

AIR DIVISION

INVOICE REQUEST FORM

(9-96)

Facility Name & Address: ACI - Coors Technical Ceramics 1100 Commerce Park Drive Oak Ridge, Tennessee 37830

CSN: 63-0164

Permit No: 1672-AOP-RO

Permit Description:

(e.g. A = AIR CODE, S=SIP, H=NESHAP, P=PSD, N=NSPS, T5= Title V)

Initial Fee Calculations:

Title V = 3(17.78)(TPY each pollutant, except CO) - amount of last annual air permit fee

NOTE: Do Not double count HAPs and VOCs!!! No greater than 4000 tpy per pollutant or less than \$1000

Fee = (\$17.78/ton)(101.3 tpy) - \$1810 = \$1801 - \$1810 = -\$9.00

Mod Fee Calculations:

Title V = **3** (17.78)(TPY increase of each pollutant, except CO)

NOTE: Do Not double count HAPs and VOCs!!! No greater than 4000 tpy for each contaminant but not less than \$1000

 $\mathbf{F} =$

Fee Amount: \$ 1000.00

Engineer:Paul OsmonDate:November 5, 1997

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Pollution Control and Ecology gives the following notice:

ACI - Coors Technical Ceramics Co., 3315 Boone Road, Benton, Saline County, Arkansas is a high tech ceramic manufacturing facility (SIC Code 3264). This facility manufactures small alumina and silicon carbide parts. No significant changes have been made to this facility since a SIP air permit was issued on May 8, 1996. ACI - Coors Technical Ceramics will be classified as a major source for volatile organic compounds under Title V of the Clean Air Act Amendments of 1990. This facility is subject to regulation under the *Clean Air Act* as amended, the *Arkansas Water and Air Pollution Control Act*, the *Arkansas Air Pollution Control Code* (Regulation 18), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulations of the Arkansas Operating Air Permit Program* (Regulation 26).

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp, Information Officer. Citizens desiring technical information concerning the application or permit should contact Paul Osmon, Engineer. Both Rhonda Sharp and Paul Osmon can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209 (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Little Rock Public Library, 100 South Rock Street, Little Rock, Arkansas 72201. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Part II of the Arkansas Pollution Control and Ecology's Commission Administrative Procedures (Regulation #8). Dated this

Randall Mathis Director