

## RESPONSE TO COMMENTS

AREZ, LLC  
PERMIT #2248-A  
AFIN: 02-00317

On February 17, 2011 and February 23, 2011, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, written comments on the draft permitting decision were submitted by ECCI on behalf of the facility. The Department's response to these issues follows.

*Note: The following page numbers and condition numbers refer to the draft permit. These references may have changed in the final permit based on changes made during the comment period.*

**Comment #1:** Specific Condition #15—The facility requests that this condition be revised as follows:

“Total dissolved solids (TDS) in SN-08 cooling water shall not exceed 12,000 parts per million (ppm) on any sample result taken when SN-08 is operating. The permittee shall develop conductivity vs. TDS curve and test for conductivity to determine TDS concentration on a weekly basis when SN-08 is operating.”

**Response to Comment #1:** The Department concurs with the comment to develop a correlation between TDS and conductivity and perform the conductivity test weekly. The Department also concludes that TDS should be determined, directly, once every six months to validate the curve. Specific Condition #15 is modified as follows:

15. Total dissolved solids (TDS) in SN-08 cooling water shall not exceed 12,000 parts per million (ppm) on any sample result taken when SN-08 is operating. The permittee shall develop a conductivity vs. TDS curve and test for conductivity on a weekly basis when SN-08 is operating. The conductivity result shall not exceed the level which correlates with 12,000 ppm TDS for any sample result taken when SN-08 is operating. The permittee shall also determine, directly, TDS once every six months. [Regulation No. 19 §19.705, §19.703, Regulation No. 18 §18.1004 §18.1003, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

# ADEQ

ARKANSAS  
Department of Environmental Quality

April 4, 2011

John Smith  
President  
Arez, LLC  
16 E. Main Street  
Mendham, NJ 07945

Dear Mr. Smith:

The enclosed Permit No. 2248-A is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 12/16/2010.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 2248-A for the construction, operation and maintenance of an air pollution control system for Arez, LLC to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, 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 Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates  
Chief, Air Division

# ADEQ MINOR SOURCE AIR PERMIT


Permit No. : 2248-A

IS ISSUED TO:

Arez, LLC  
141 Mac McGoogan Drive  
Crossett, AR 71635  
Ashley County  
AFIN: 02-00317

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

  
Mike Bates  
Chief, Air Division

April 4, 2011  
Date

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Section I: FACILITY INFORMATION

PERMITTEE: Arez, LLC  
AFIN: 02-00317  
PERMIT NUMBER: 2248-A  
FACILITY ADDRESS: 141 Mac McGoogan Drive  
Crossett, AR 71635  
MAILING ADDRESS: 16 E. Main Street  
Mendham, NJ 07945  
COUNTY: Ashley County  
CONTACT NAME: John Smith  
CONTACT POSITION: President  
TELEPHONE NUMBER: 973-543-6900  
REVIEWING ENGINEER: Travis Porter  
UTM North South (Y): Zone 15: 3666733.25 m  
UTM East West (X): Zone 15: 598719.42 m

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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
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Smaller Than Ten Microns
SO <sub>2</sub>	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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## Section II: INTRODUCTION

### Summary of Permit Activity

Arez, LLC, submitted an application for a new permit for a gum and wood chemical manufacturing facility located at 141 Mac McGoogan Drive, Crossett. Total permitted emissions for this facility are: PM/PM<sub>10</sub>, 18.9 tpy, SO<sub>2</sub> 0.1 tpy, VOC, 26.1 tpy, CO, 4.6 tpy, NO<sub>x</sub>, 5.5 tpy, and HAPs, 0.75 tpy.

### Process Description

The plant will be situated on a 6 acres site and will produce resins for the printing ink industry. There will be rail for delivery and shipment of bulk material. Next to the rail, a tank farm will be built with capabilities of storing bulk raw materials and finished goods. The production area will have two reactors each with a capacity of 55,000 lbs. The finished product will be either pumped to the tank farm or cooled and packaged in 50 lb. paper bags or bulk bags of 1,000-1,500 lbs. The packaged finished product will be stored in the 25,000 square feet warehouse, along with some of the solid raw material. The facility will have a utility room area with hot oil heater, air compressor, and a cooling tower. There will also be an office area and laboratory for quality control.

The tank farm has seven storage tanks; two Rosin tanks, one Nonylphenol tank, two solution tanks and two oil tanks. Rosin, Nonylphenol and solution tanks are vented through a common liquid seal (SN-01) that has liquid head pressure above the vapor pressure of the material which allows no emissions. Emissions only exist when the tanks are being loaded. The two oil tanks are vented to atmosphere because there are minimal emissions from these tanks (SN-06).

The cooling tower (SN-08) is used to cool the finished product in the pan. There are two pumps that pump water to the pans. The hot oil heat exchanger is cooled with cooling tower water. The liquid seal tanks are also cooled with cooling tower water.

The process is batch and is carried out in the two 55,000 lb reactors. While the reactors are pressure rated for 150 psi, the maximum operating pressure during the batch process will be about 50 psi. The two reactors are equipped with agitators for mixing.

The process is heated and cooled with an internal coil inside the reactor. The heating and cooling medium is oil from the hot / cold oil system in the utility room (SN-07).

Solids are added to the reactor via the hopper on top of the reactor. The hopper is also pressurized and nitrogen is used to push the material in the reactor. The reactor is at all times isolated from the atmosphere when adding solids. During solids additions the dust collector is used to collect any dust generated from the addition of the powders to the hopper (SN-04).

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There are many formulations for producing ink resins. The variations are in the mix and percentages of the raw materials. A typical formulation is shown below.

The process begins by pumping rosin from the tank farm to the reactors. The storage temperature of the rosin is about 350 F. Nonylphenol is then pumped from the tank farm to the reactors. The storage temperature of the Nonylphenol is 120 F. The mixture is mixed and cooled to 230 F for the Para formaldehyde addition. When the addition is complete the reactor is closed and a pressure cycle is carried out. This cycle takes about 3 hours. Then the reactor is vented slowly to the liquid seal tank and all the water vapor from the reaction is condensed in the liquid seal tanks (SN-02). The reactor is then further heated to 360 F and maleic anhydride is added. Then a malice cycle is done by closing the reactor for 15 minutes and then venting the reactor. During this cycle minimum pressure is generated of about 5 psi. When the temperature reaches 400 F Pentaerythritol is added. This material is added through the hopper. The reactor is then heated to top temperature of about 510 F. During the heating cycle the reactor is vented through the liquid seal and all the water vapor is condensed. When top temperature is reached the batch is ready for quality control testing.

When the product reaches top temperature a sample is taken and tested for final specifications. There might be a need for vacuum application on the reactor to help reach the required specifications. This is done via the vacuum system. The vacuum pump is turned on and vacuum is applied to the reactor by opening the control valve on the reactor. The vacuum tank is vented through the liquid seals. The venting during this cycle is also condensed in the liquid seal tanks.

When the product reaches the final specification it's either dropped on the pan in the cooling room or converted into resin solution.

If the product is converted to resin solution, oil is pumped to the reactor from the tank farm. When the pumping is completed a sample is taken and quality control testing is carried out. When the final specifications are reached and the product is cooled to about 220 F it's pumped to the resin solution tanks in the tank farm.

If the product is dropped on the pan, before dropping the resin the cooling room is sealed and no emissions are vented outside at this point from dropping the resin. The cooling pan has a half pipe jacket welded under it. Water is pumped through this coil before starting to drop the resin. The cooling cycle is about 6 – 10 hrs, depending on the product. When the product temperature in the pan is at room temperature the product is then transported to the crusher (SN-03) for crushing. The product is then transported via the bucket elevator to the bagging equipment for packaging in 50 lb. paper bags or bulk bags of 1,000-1,500 lbs. (SN-05).



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### Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009

### Total Allowable Emissions

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb./hr.	tpy
PM	4.5	18.9
PM <sub>10</sub>	4.5	18.9
SO <sub>2</sub>	0.1	0.1
VOC	9.6	26.1
CO	1.1	4.6
NO <sub>x</sub>	1.3	5.5
Maleic Anhydride	0.17	0.75

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### Section III: PERMIT HISTORY

This is the initial permit for the facility.

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Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.  
 [Regulation 19, §19.501 et seq., and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb./hr.	tpy
01	Storage Tanks	VOC	0.1	0.1
02	Reactor Vent	VOC	9.0	24.7
03	Scraping Operation	PM <sub>10</sub>	0.1	0.1
04	Dust Collector for Reactor Solid Loading	PM <sub>10</sub>	0.9	3.8
		VOC	0.2	0.8
05	Dust Collector for Crushing/Packaging	PM <sub>10</sub>	2.2	9.5
06	Ink Oil Tanks (2)	VOC	0.2	0.1
07	Hot/Cold Oil Heater	PM <sub>10</sub>	0.1	0.5
		SO <sub>2</sub>	0.1	0.1
		VOC	0.1	0.4
		CO	1.1	4.6
		NO <sub>x</sub>	1.3	5.5
08	Cooling Tower	PM <sub>10</sub>	1.2	5.0

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

SN	Description	Pollutant	lb./hr.	tpy
03	Scraping Operation	PM	0.1	0.1
04	Dust Collector for Reactor Solid Loading	PM	0.9	3.8
		Maleic Anhydride*	0.17	0.75
05	Dust Collector for Crushing/Packaging	PM	2.2	9.5

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SN	Description	Pollutant	lb./hr.	tpy
07	Hot/Cold Oil Heater	PM	0.1	0.5
08	Cooling Tower	PM	1.2	5.0

\*Included in VOC totals

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
01, 02, 03, 04, 05, 06, 07	5%	[Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
08	20%	[Regulation No. 19 §19.503 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

4. 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. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-01--SN-05 Conditions

6. The permittee shall not produce more than 25,000,000 pounds of product at the facility per rolling 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #6. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee shall not process more than 600,000 kg of Maleic Anhydride at the facility per rolling 12-month period. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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9. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #8. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. This permit authorizes Maleic Anhydride as the only HAP to be processed at the facility. The permittee shall process no other HAPs at the facility. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
11. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #10. These records shall consist of current Material Safety Data Sheets (MSDS) for all raw materials and process materials used at the facility. These records shall be made available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-06 Conditions

12. The permittee shall not process more than 1,500,000 kg of Ink Oil through SN-06 per rolling 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #12. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-07 Conditions

14. The permittee shall combust only natural gas in the Hot/Cold Oil Heater, SN-07. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-08 Conditions

15. Total dissolved solids (TDS) in SN-08 cooling water shall not exceed 12,000 parts per million (ppm) on any sample result taken when SN-08 is operating. The permittee shall develop a conductivity vs TDS curve and test for conductivity on a weekly basis when SN-08 is operating. The conductivity result shall not exceed the level which correlates with 12,000 ppm TDS for any sample result taken when SN-08 is operating. The permittee shall also determine, directly, TDS once every six months. [Regulation No. 19 §19.705, §19.703, Regulation No. 18 §18.1004 §18.1003, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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16. The permittee shall maintain records of test results to demonstrate compliance with Specific Condition #15. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee shall keep the records onsite and make the records available to Department personnel upon request. [Regulation 19, §19.705, Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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Section V: INSIGNIFICANT ACTIVITIES

The Department 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 Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated December 16, 2010.

Description	Category
None	

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## Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that 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 that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor



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5301 Northshore Drive  
North Little Rock, AR 72118-5317

7. The permittee shall 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) newly constructed or 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) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) calendar days after the completion of 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]
8. The permittee shall 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
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
  - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
  - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such

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occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
  - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
  - c. To inspect any monitoring equipment or monitoring method required in this permit;
  - d. To sample any emission of pollutants; and
  - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]
19. 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 Department approval. The Department 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.

[Regulation 18, §18.314(A), Regulation 19, §19.416(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

20. 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 Department approval. Any such emissions shall be included in the facilities total emissions and reported as such. The Department 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 Department 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.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

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21. 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 Department approval. The Department 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.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

**CERTIFICATE OF SERVICE**

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to  
Arez, LLC, 16 E. Main Street, Mendham, NJ, 07945, on this 4<sup>th</sup> day of  
April, 2011.

Pam Owen  
Pam Owen, AAI, Air Division