

ADEQ DRAFT MINOR SOURCE AIR PERMIT

Permit No. : 2248-AR-4

IS ISSUED TO:

Alvar Resins Inc.
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. § 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

William K. Montgomery
Interim Associate Director
DEQ, Office of Air Quality

Date

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List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE:	Alvar Resins Inc.
AFIN:	02-00317
PERMIT NUMBER:	2248-AR-4
FACILITY ADDRESS:	141 Mac McGoogan Drive Crossett, AR 71635
MAILING ADDRESS:	PO Box 949 Crossett, AR 71635
COUNTY:	Ashley County
CONTACT NAME:	Albert Snow
CONTACT POSITION:	Laboratory Manager
TELEPHONE NUMBER:	(870) 605-4542
REVIEWING ENGINEER:	Andrea Sandage
UTM North South (Y):	Zone 15: 3665977.02 m
UTM East West (X):	Zone 15: 596898.48 m

Section II: INTRODUCTION

Summary of Permit Activity

Alvar Resins Inc. operates a gum and wood chemical manufacturing facility located at 141 Mac McGoogan Drive, Crossett. This DeMinimis permit modification is being issued to update storage tanks T106 and T107 to allow current product flexibility and update the process description to include tank farm designations.

The total annual permitted emissions decreased by 0.2 tpy VOC.

Process Description

The plant is situated on a 6 acres site and produces resins for the printing ink industry. A rail line exists for delivery and shipment of bulk material, and a tank farm, located next to the rail, stores bulk raw materials and finished goods. The production area has two reactors; each has a capacity of 10,000 gallons. The finished product is either pumped to the tank farm or cooled and packaged in 50 lb. paper bags or bulk bags. The packaged finished product is stored in the 25,000 square feet warehouse, along with some of the solid raw material. The facility has a utility room area with hot oil heater and air compressor. There is also a cooling tower in this facility. There is an office area and a laboratory for quality control.

The tank farm has seven storage tanks; Tanks T101 and T102 (Rosin tanks), Tank T105 (nonylphenol tank), Tanks T106 and T107 (storage tanks) and Tanks T103 and T104 (oil tanks). T105 (Nonylphenol), T106 and T107 (storage tanks) will vent to the atmosphere because there are minimal emissions from these tanks (SN-01). Tanks T103 and T104 (oil tanks) are vented to atmosphere because there are minimal emissions from these tanks (SN-06). Tanks T101 and T102 (Rosin tanks) are vented to the atmosphere as a Group A-13 Insignificant Activity.

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 10,000 gal reactors. While the reactors are pressure rated for 150 psi, the maximum operating pressure during the batch process will be about 75 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 is 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 March 14, 2016
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective March 14, 2016

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 ₁₀	4.5	18.9
PM _{2.5}	See Note*	
SO ₂	0.1	0.1
VOC	9.6	26.1
CO	1.1	4.6
NO _x	1.3	5.5
Maleic Anhydride	0.17	0.75

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

GHG Status

This facility is classified as a minor source of greenhouse gas emissions because it has the potential to emit less than 100,000 tpy CO₂e or less than 100 tpy mass basis combined greenhouse gases.

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Section III: PERMIT HISTORY

Permit 2248-A, the initial permit for the facility, was issued on April 4, 2011. Total permitted emissions were: PM/PM₁₀, 18.9 tpy, SO₂ 0.1 tpy, VOC, 26.1 tpy, CO, 4.6 tpy, NO_x, 5.5 tpy, and HAPs, 0.75 tpy.

Permit 2248-AR-1 was issued on June 18, 2012. The Administrative Amendment added a 550-gallon diesel storage tank and dispenser unit as a Group A-3 Insignificant Activity. Total permitted emissions did not change with this activity.

Permit 2248-AR-2 was issued on January 31, 2013. This Administrative Amendment modified rosin tank #1 and rosin tank #2. The modification moved the venting from SN-01 to the atmosphere. The two rosin tanks became a Group A-13 Insignificant Activity. Total permitted emissions did not change with this activity.

Permit 2248-AR-3 was issued on August 6, 2014. The DeMinimis permit modification allowed storage of rosin or resin in the resin/rosin solution tank #1 and #2. The modification allowed greater flexibility for the rosin storage when needed. An Administrative Amendment added a natural gas fired boiler to the Insignificant Activities list. Permitted increased emissions were VOC 0.2 tpy.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.19.501 *et seq.* 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
01	Storage Tanks	VOC	0.1	0.1
02	Reactor Vent	VOC	9.0	24.7
03	Scraping Operation	PM ₁₀	0.1	0.1
04	Dust Collector for Reactor Solid Loading	PM ₁₀	0.9	3.8
		VOC	0.2	0.8
05	Dust Collector for Crushing/Packaging	PM ₁₀	2.2	9.5
06	Ink Oil Tanks (2)	VOC	0.2	0.1
07	Hot/Cold Oil Heater	PM ₁₀	0.1	0.5
		SO ₂	0.1	0.1
		VOC	0.1	0.4
		CO	1.1	4.6
		NO _x	1.3	5.5
08	Cooling Tower	PM ₁₀	1.2	5.0

2. The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.18.801 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
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

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

SN	Limit	Regulatory Citation
03, 04, 05, 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]

- 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 Ark. Code Ann. § 8-4-303. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Reg.18.901 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-01 – SN-05 Conditions

- The permittee shall not produce more than 25,000,000 pounds of product at the facility per rolling 12-month period. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- 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. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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8. The permittee shall not process more than 600,000 kg of Maleic Anhydride at the facility per rolling 12 month period. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
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. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-08 Conditions

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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. [Reg.19.705, Reg.19.703, Reg.18.1004, Reg.18.1003 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
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. [Reg.19.705, Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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 Regulation 19 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 applications dated December 16, 2010, May 25, 2012, December 12, 2012 and May 22, 2014. [Reg.19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
Boiler (100 BHP Steam Generator – 4.3 MMbtu/hr)	A-1
550 Gallon Diesel Storage Tank and Dispenser	A-3
Rosin Tank #1	A-13
Rosin Tank #2	A-13

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 (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 Regulation 18 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 that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 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.
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. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after each of the following events: 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. [Reg.19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Reg.19.410(B) and/or Reg.18.309(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Arkansas Department of Environmental Quality
Office of Air Quality
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 sixty (60) calendar days after the completion of testing. [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall provide: [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.303 and/or Reg.18.1104 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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: [Reg.19.601 and/or Reg.18.1101 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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 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: [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.410(A) and/or Reg.18.309(A) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.407(B) and/or Reg.18.307(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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15. This permit shall be available for inspection on the premises where the control apparatus is located. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 16. This permit authorizes only those pollutant emitting activities addressed herein. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 17. This permit supersedes and voids all previously issued air permits for this facility. [Reg. 18 and/or Reg. 19 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 18. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [Ark. Code Ann. § 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.
- [Reg.18.314(A) and/or Reg.19.416(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]
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 facility's 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.

[Reg.18.314(B) and/or Reg.19.416(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]

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.

[Reg.18.314(C) and/or Reg.19.416(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]

22. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [Reg.18.1001, Reg.19.701, 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]