

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1772-AR-1

IS ISSUED TO:

North American Pipe Corporation
603 South 28th Street
Van Buren, AR 72956
Crawford County
CSN: 17-0012

THIS PERMIT IS YOUR 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 YOUR 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:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE: North American Pipe Corporation

CSN: 17-0012

PERMIT NUMBER: 1772-AR-1

FACILITY ADDRESS: 603 South 28th Street
Van Buren, AR 72956

COUNTY: Crawford

CONTACT POSITION: Ernie Swartzfager

TELEPHONE NUMBER: 501-474-2393

REVIEWING ENGINEER: Kale Hanner

UTM North-South (X): Zone 15 : 3921.257

UTM East-West (Y): Zone 15 : 379.433

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SECTION II: INTRODUCTION

Summary

Van Buren Pipe Corporation (VBPC) produces polyvinyl chloride (PVC) and polyethylene (PE) pipe. This permit modification covers the addition of one PVC and two PE extruders. This results in an increase in particulate and VOC emissions at the facility. VBPC remains a minor source and is not subject to any NSPS or NESHAP conditions.

Process Description

PVC Pipe Manufacturing

VBPC's facility has the potential to produce 51,979 tpy of PVC pipe. The PVC pipe is produced by extruding a mixture of PVC resin, mineral oil-based stabilizer, calcium carbonate (CaCO_3), filler, titanium oxide, and wax. The blended resin is referred to as the compound. Particulate emissions are generated during four material process operations: material storage, conveying, hot roll mixing, and grinding. The majority of the emissions are controlled with either a baghouse or a cyclone.

PVC resin is transferred with two unloaders (EPN SN-109, SN-130) from rail cars to two resin storage silos (SN-101 & 102). CaCO_3 is also unloaded similarly from rail cars to a storage silo that contains CaCO_3 (EPN SN-103). From the silos, the PVC resin and CaCO_3 are transferred to the mixer using high pressure air blowers. Other solid ingredients are added manually to the mixer, while stabilizer oil is transferred to the cooler. The compound is frictionally heated in the mixer and then transferred to the cooler. Air from the mix area is vented to the mix room baghouse (EPN SN-105).

The compound is blown from the cooler to the surge hopper, which feeds seven intermediate storage silos (EPNs SN-111 thru 117). The compound feeds seven extruder hoppers, which are vented to the mix room baghouse (EPN SN-105). The extruders produce pipe by forcing the compound through a specially designed orifice. As the pipe leaves the extruder, it is sawed into sections (EPN SN-110). The sawing operation generates large shavings of finished pipe material and virtually no visible particulate matter. Pipe rejected for quality control is sent to the pipe grinder, controlled by Cyclone #1 (EPN SN-106). The ground pipe is blown to the pulverizer. Emissions are controlled by Cyclone #2 (EPN SN-107) before the ground material is fed to the pulverizer. The pulverizer is also controlled by Cyclone #3 (EPN SN-108). The refined material is then recycled back to the extruder inlet using a small mechanical auger.

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VOC emissions are generated when PVC resin, stabilizer, dye and other additives are heated for extrusion for a time period ranging from 6 to 9 minutes. The mixture is heated to evaporate both moisture and volatiles to prevent bubble formation in the finished pipe. The heating time of the material depends on the thickness and the diameter of the pipe. Larger and thicker wall pipe remains in the extruder for up to 15 minutes while smaller diameter pipe remains for approximately 5 minutes. Immediately after exiting the die of the extruder, the hot pipe is sprayed with water to cool and solidify the material. The extruder is vented by individual vacuum pumps, which pull the vapors from the extruder and deliver them to a covered water trench that runs under the extruders. This trench is then directed to an outdoor oil/water separator, which allows volatiles to escape outside the building. VOC fugitives are emitted from inside the building and escape through doors, vents, and windows as well as from the outdoor oil/water vacuum pump separator.

Of the raw ingredients, PVC resin and stabilizer emit the majority of the VOCs when heated. Although the PVC resin contains very low levels of volatiles, VOC emissions are still generated because the material is used in such large quantities. Stabilizer is a combination of mineral oil carrier, paraffin, polyethylene and calcium stearate. This mixture usually contains about 50 to 70 percent VOCs.

PE Pipe Manufacturing

VBPC's facility has the potential to produce 19,163 tpy of PE pipe via extruding ready-to-make PE resin high density polyethylene (HDPE). The manufacturing process is similar to the one used for PVC pipe, except that the PE resin does not require additional ingredients.

The resin is unloaded pneumatically from rail cars to three PE resin storage silos (SN-118, SN-119 and SN-127). Unlike the fine, powder-like resin in the PVC process, PE resin is shaped in beads. Because there is little to no particulate matter generated during the transfer of PE resin beads, the silos do not contain baghouses. Instead, the silo vents are covered with a mesh screen material.

The resin beads are transferred to a surge hopper which feeds five extruder hoppers. The extruder hoppers contain filter bags (EPNs SN-120, SN-121, SN-122, SN-125, and SN-126). The extruder produces finished pipe by forcing the PE resin through a specially designed orifice at 400EF. As the pipe leaves the extruder, it is cut into sections by a saw (EPN SN-123). Pipe rejected for quality control is sent to either a small or large pipe grinder. The small pipe grinder is controlled by a dedicated cyclone/storage bin (EPN SN-124), while the large pipe grinder is controlled by two cyclone/storage bins (EPN SN-128 and SN-129) operated in parallel. The reclaimed material is then recycled back to the extruder inlet using a small mechanical auger.

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VOC emissions are generated when the PE resin is heated in the extruder. The mixture is heated to evaporate both moisture and any volatiles to prevent bubble formation in the finished pipe. The heating time of the material in the heated section of the extruder depends upon the diameter and wall thickness of the desired finished pipe. Larger and thicker wall pipe remains in the extruder for up to 15 minutes, while smaller diameter pipe remains for approximately 5 minutes. Immediately after exiting the die of the extruder, the hot pipe is sprayed with water to cool and solidify the material. The extruder is then vented by individual vacuum pumps, which pull the vapors from the extruder and deliver them to a covered water trench that runs under the extruder. This trench is then directed to an outdoor oil/water separator, which allows volatiles to escape outside the building. VOC fugitives are emitted from inside the building and escape through doors, vents, and windows as well as from the vacuum pump.

Regulations

The facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Air Code) and the regulations of the *Arkansas State Implementation Plan for Air Pollution Control* (SIP).

The following table is a summary of the facility's total emissions.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	4.9	21.0
PM ₁₀	4.9	21.0
VOC	0.9	3.5
Vinyl Chloride	0.01	0.04

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SECTION III: PERMIT HISTORY

1172-A **Issued on June 25, 1998, this was the initial permit for the facility. This permit was prompted due to the increase in production in 1997.**

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SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
101	PVC Silo #1 Vent	PM ₁₀	0.07	0.31
102	PVC Silo #2 Vent	PM ₁₀	0.07	0.31
103	CaCO ₃ Silo	PM ₁₀	0.01	0.04
105	Mix Room Dust Collector	PM ₁₀	0.55	2.34
106	Reclaim Cyclone #1	PM ₁₀	1.03	4.42
107	Reclaim Cyclone #2	PM ₁₀	1.03	4.42
108	Reclaim Cyclone #3	PM ₁₀	1.03	4.42
109	Unloading System Bin Vent #1	PM ₁₀	0.08	0.32
130	Unloading System Bin Vent #2	PM ₁₀	0.08	0.32
110	Line Saws	PM ₁₀	0.07	0.31
111	Extruder Silo #1	PM ₁₀	0.02	0.10
112	Extruder Silo #2	PM ₁₀	0.02	0.10
113	Extruder Silo #3	PM ₁₀	0.02	0.10
114	Extruder Silo #4	PM ₁₀	0.02	0.10
115	Extruder Silo #5	PM ₁₀	0.02	0.10
116	Extruder Silo #6	PM ₁₀	0.02	0.10

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SN	Description	Pollutant	lb/hr	tpy
117	Extruder Silo #7	PM ₁₀	0.02	0.10
118	PE Resin Silo #1	PM ₁₀	0.08	0.36
119	PE Resin Silo #2	PM ₁₀	0.08	0.36
127	PE Resin Silo #3	PM ₁₀	0.08	0.36
120	PE Extruder #1 Bag Filter	PM ₁₀	0.01	0.05
121	PE Extruder #2 Bag Filter	PM ₁₀	0.01	0.05
122	PE Extruder #3 Bag Filter	PM ₁₀	0.01	0.05
125	PE Extruder #4 Bag Filter	PM ₁₀	0.01	0.05
126	PE Extruder #5 Bag Filter	PM ₁₀	0.01	0.05
123	PE Line Saws	PM ₁₀	0.03	0.11
124	PE Small Grinder Cyclone	PM ₁₀	0.13	0.54
128	PE Large Grinder Cyclone	PM ₁₀	0.13	0.54
129	PE Large Grinder Cyclone	PM ₁₀	0.13	0.54
-	Fugitives	VOC	0.82	3.43

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
101	PVC Silo #1 Vent	PM	0.07	0.31
102	PVC Silo #2 Vent	PM	0.07	0.31
103	CaCO ₃ Silo	PM	0.01	0.04

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SN	Description	Pollutant	lb/hr	tpy
105	Mix Room Dust Collector	PM	0.55	2.34
106	Reclaim Cyclone #1	PM	1.03	4.42
107	Reclaim Cyclone #2	PM	1.03	4.42
108	Reclaim Cyclone #3	PM	1.03	4.42
109	Unloading System Bin Vent #1	PM	0.08	0.32
130	Unloading System Bin Vent #2	PM	0.08	0.32
110	Line Saws	PM	0.07	0.31
111	Extruder Silo #1	PM	0.02	0.10
112	Extruder Silo #2	PM	0.02	0.10
113	Extruder Silo #3	PM	0.02	0.10
114	Extruder Silo #4	PM	0.02	0.10
115	Extruder Silo #5	PM	0.02	0.10
116	Extruder Silo #6	PM	0.02	0.10
117	Extruder Silo #7	PM	0.02	0.10
118	PE Resin Silo #1	PM	0.08	0.36
119	PE Resin Silo #2	PM	0.08	0.36
127	PE Resin Silo #3	PM	0.08	0.36
120	PE Extruder #1 Bag Filter	PM	0.01	0.05
121	PE Extruder #2 Bag Filter	PM	0.01	0.05
122	PE Extruder #3 Bag Filter	PM	0.01	0.05
125	PE Extruder #4 Bag Filter	PM	0.01	0.05
126	PE Extruder #5 Bag Filter	PM	0.01	0.05

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SN	Description	Pollutant	lb/hr	tpy
123	PE Line Saws	PM	0.03	0.11
124	PE Small Grinder Cyclone	PM	0.13	0.54
128	PE Large Grinder Cyclone	PM	0.13	0.54
129	PE Large Grinder Cyclone	PM	0.13	0.54
-	Fugitives	Vinyl Chloride	0.01	0.04

3. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
101, 102, 103, 105, 109, 130, 111-122, 125, 126, 127	5%	§18.501
106, 107, 108, 110, 123, 124, 128, 129	10%	§18.501

4. Pursuant to §18.801 of Regulation 18, 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 A.C.A. §8-4-303.
5. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §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.
6. Pursuant to §19.303 of Regulation 19, and A.C.A. §8-4-203 as referenced by §8-4-304

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and §8-4-311, cyclones associated with this facility shall be maintained and operated in serviceable condition as prescribed by the manufacturer during operation of this plant. Baghouses shall maintain a minimum pressure drop of 3 inches of water and a maximum pressure drop of 5 inches of water. Also, the stream entering the baghouse shall not drop below 80°F or rise above 400°F. The baghouses shall be kept in good working condition at all times. Cyclones and baghouses shall be inspected as necessary to assure that each one is in good working condition.

7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 52,000 tons of PVC pipe at the facility per consecutive 12 month period.
8. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #7. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request.
9. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 19,200 tons of PE pipe at the facility per consecutive 12 month period.
10. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #9. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request.

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SECTION V: INSIGNIFICANT ACTIVITIES

The following types of activities or emissions are deemed 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 November 2, 1999.

Description	Category
None Reported in Application	

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SECTION VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall 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 thereunder.
3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department 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.
4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, records must be kept for five years which will 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 records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

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6. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

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

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested 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 or (2) equipment already operating shall be tested according to the time frames set forth by the Department. 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.
8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
- a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall 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:
 - 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 that all reasonable measures have been taken 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 shall 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, it need not be submitted again.
11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
 - 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
 - e. To perform an operation and maintenance inspection of the permitted source

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12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued 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.
13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall 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. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.

APPENDIX A

APPENDIX B

APPENDIX C

INVOICE REQUEST FORM

PDS-

Date April 4, 2003

<input checked="" type="checkbox"/>	Air
<input type="checkbox"/>	NPDES
<input type="checkbox"/>	Stormwater
<input type="checkbox"/>	State Permits Branch
<input type="checkbox"/>	Solid Waste

CSN 17-0012

Facility Name North American Pipe Corporation

Invoice Mailing Address 603 South 28th Street

Van Buren, Arkansas 72956

<input type="checkbox"/>	Initial
<input checked="" type="checkbox"/>	Modification
<input type="checkbox"/>	Annual

Permit Number 1772-AR-1
Permit Description Minor Source
Permit Fee Code A

Amount Due\$ 400.00

Engineer Kale Hanner

Paid? ☐No ☐Yes Check #

Comments: Air Permit Fee Calculation

Public Notice

Pursuant to A.C.A. §8-4-203, and the regulations promulgated thereunder, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Van Buren Pipe Corp. (VBPC) produces polyvinyl chloride (PVC) and polyethylene (PE) pipe (SIC Code 3079/3292) at 603 South 28th St., Van Buren, Arkansas. This permit modification covers the addition a one PVC and two PE extruders. This results in an increase in particulate and VOC emissions at the facility. VBPC remains a minor source.

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 Kale Hanner, Engineer. Both Rhonda Sharp and Kale Hanner can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (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 Fort Smith Public Library at 61 South Eighth in Fort Smith, Arkansas 72901. 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, or the proposed modification, 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 Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8).

Dated this

Randall Mathis
Director