

# ADEQ OPERATING AIR PERMIT

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

Permit #: 418-AOP-R1

IS ISSUED TO:

Carrier Refrigeration Operations - Conway Division  
707 Robins Street  
Conway, AR 72032  
Faulkner County  
CSN: 23-0006

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:

January 19, 1999    and    January 18, 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Keith A. Michaels

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Date Modified

**SECTION I: FACILITY INFORMATION**

PERMITTEE: Carrier Refrigeration Operations -  
Conway Division

CSN: 23-0006

PERMIT NUMBER: 418-AOP-R1

FACILITY ADDRESS: 707 Robins Street  
Conway, AR 72032

COUNTY: Faulkner

CONTACT POSITION: Environmental Coordinator -  
Gary Christiansen

TELEPHONE NUMBER: (501)450-3733

FAX NUMBER: (501)450-3787

REVIEWING ENGINEER: Paul Osmon

UTM North-South (X): 3881.4 km

UTM East-West (Y): 551.5 km

Zone 15

**Carrier Refrigeration Operations - Conway Division**  
**Permit #: 418-AOP-R1**  
**CSN #: 23-0006**

## **SECTION II: INTRODUCTION**

Carrier Refrigeration Operations - Conway Division, located at 707 Robins Street, Conway, Faulkner County, Arkansas 72032, manufactures commercial refrigeration equipment and metal store fixtures. Permit #418-AOP-R1 is the first modification of the operating permit issued to this facility under the requirements of Regulation #26 (Title V). This permit modification is issued to modify the VOC content limits of paints, and allow the use of cleaning solvents not allowed by the initial permit.

### **Regulations**

Carrier is subject to regulation under the Clean Air Act as amended, the Arkansas Water and Air Pollution Control Act, the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19), and the Regulations of the Arkansas Operating Air Permit Program (Regulation #26). The facility is not subject to 40 CFR 60, Subpart SS-*Standards of Performance for Industrial Surface Coating: Large Appliances* because the affected surface coating operations were constructed before December 24, 1980.

### **Process Description**

Steel blanks or coils are cut to the correct size, punched, and holes notched before being formed into three dimensional shapes of the refrigerator cabinet shells. Galvanized steel is cut to size and formed into back panels.

The intermediate products are blanked from stock steel and the corner edges of the refrigerator doors are welded to close the cut edges. Spot welding, braze, and silver solder convert the metal parts into the refrigerated cabinets.

The formed and welded metal parts are painted using powder paint. In this operation, the metal parts are hung on the overhead conveyor and move through the pre-wash system. The metal parts are first cleaned and phosphate-conversion coated in a pre-wash system: the process uses an alkaline cleaner, which is followed by a tap water rinse, application of iron phosphate (an organic sealer), and once again by another water rinse. The excess is dripped back into the tanks underneath. The metal parts are dried in a natural gas dryoff oven. The total heat capacity is 5.5 million Btu/hr.

After the pre-wash system, the metal parts proceed to a direct gas-fired dry-off oven. From the dry-off oven, the door sets proceed to a cooling tunnel where the temperature of the sets can be lowered to a temperature suitable for painting.

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The powder used for painting the metal parts is an epoxy hybrid that does not contain any VOC. Three paint booths are used to apply the powder paint to the cleaned metal. An advanced cartridge filter technology is used to reduce particulate matter. The air used to contain and recover the over-sprayed powder will be filtered through the filters and returned to the plant as clean air. There will be no outside emissions from the powder paint system.

One make-up booth to be used for miscellaneous touch-ups will be located near the powder paint. This source is classified as an insignificant activity.

The direct-fired gas combination oven is used to cure the powder paint. The powder paint coating system shares the same oven as the dry-off oven.

The painted and baked refrigerator parts and door are then assembled into refrigerators or freezers. The counter fixtures are assembled along with the laminated wood parts. At this point, the refrigerator and freezer cabinets are ready to be insulated.

Polyol and MDI (polymeric diphenylmethane diisocyanate), the chemical reactants for the urethane foam, are mixed at the point of injection and pressure fed into the prepared cabinets and doors. The polyol stream consists of polyol, surfactant, catalyst, and blowing agent. It is kept in a chilled tank to prevent the blowing agent from vaporizing before use.

After the foam injection process, the refrigerators and freezers undergo final assembly. A compressor and electrical components are added and more brazing operations are performed to seal the copper tubing. Refrigerant is then charged into the unit. After leak and performance testing, shelving and accessories are installed and the fully completed unit is cleaned.

### **Summary**

A summary of facility wide emissions is provided in the following table. Specific emission unit information is located by the indicated cross reference pages.

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<b>EMISSION SUMMARY</b>					
<b>Source #</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission Rates</b>		<b>Cross Reference Page</b>
			<b>lb/hr</b>	<b>tpy</b>	
	<b>Total Allowable Emissions</b>	<b>PM</b>	<b>3.1</b>	<b>12.0</b>	<b>---</b>
		<b>PM<sub>10</sub></b>	<b>3.1</b>	<b>12.0</b>	
		<b>SO<sub>2</sub></b>	<b>0.4</b>	<b>0.4</b>	
		<b>VOC</b>	<b>51.9</b>	<b>147.5</b>	
		<b>CO</b>	<b>0.9</b>	<b>3.2</b>	
		<b>NO<sub>x</sub></b>	<b>3.1</b>	<b>13.1</b>	
		<b>HCFC*</b>	<b>15.3</b>	<b>16.0</b>	
		<b>Acetone</b>	<b>0.70</b>	<b>0.35</b>	
		<b>Ethyl Benzene</b>	<b>1.26</b>	<b>4.63</b>	
		<b>Formaldehyde</b>	<b>0.01</b>	<b>0.05</b>	
		<b>Glycol Ethers</b>	<b>16.25</b>	<b>53.75</b>	
		<b>Methanol</b>	<b>0.95</b>	<b>0.60</b>	
		<b>Methyl Ethyl Ketone</b>	<b>2.35</b>	<b>1.17</b>	
		<b>Methylene Chloride</b>	<b>1.60</b>	<b>6.00</b>	
		<b>Toluene</b>	<b>5.25</b>	<b>2.92</b>	
		<b>Xylene</b>	<b>13.87</b>	<b>46.26</b>	
01	Pre-Wash System Refrigerator Components	PM	0.1	0.4	9
		PM <sub>10</sub>	0.1	0.4	
		SO <sub>2</sub>	0.1	0.1	
		VOC	0.1	0.2	
		CO	0.2	0.6	
		NO <sub>x</sub>	0.6	2.5	
02	Touch-Up Spray Paint Booth Refrigerator Components	PM	0.2	0.1	12
		PM <sub>10</sub>	0.2	0.1	
		VOC	16.0	8.0	
		Acetone	0.70	0.35	
		Ethyl Benzene	0.26	0.13	
		Glycol Ethers	0.40	0.20	
		Methanol	0.91	0.46	
		Methyl Ethyl Ketone	2.35	1.17	
		Toluene	5.16	2.59	
		Xylene	1.58	0.79	
03	Combination Drying/Curing Oven Refrigerator Components	PM	0.1	0.3	15
		PM <sub>10</sub>	0.1	0.3	
		SO <sub>2</sub>	0.1	0.1	
		VOC	0.1	0.2	
		CO	0.2	0.5	
		NO <sub>x</sub>	0.5	2.2	
04	Urethane Foam Operations Refrigerator Components	VOC	4.0	16.8	17
		HCFC	12.8	12.8	
		Glycol Ether	4.0	16.8	

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EMISSION SUMMARY					
Source #	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
05	Refrigerant Charging Operations Refrigerator Products	HCFC	2.5	3.2	19
06	Finish Cleaning Operations Refrigerator Products	VOC Glycol Ether Toluene Xylene	4.3 3.85 0.03 0.06	12.7 11.55 0.10 0.19	20
07	Pre-Wash System and Drying Oven Fixture Components	PM PM <sub>10</sub> SO <sub>2</sub> VOC CO NO <sub>x</sub>	0.2 0.2 0.1 0.1 0.4 1.6	0.7 0.7 0.1 0.3 1.7 6.8	23
08	Spray Paint Booths Fixture Components	PM PM <sub>10</sub> VOC Formaldehyde Glycol Ether Xylene Ethyl Benzene	0.4 0.4 24.0 0.01 8.00 12.20 1.00	1.5 1.5 97.2 0.05 25.20 45.18 4.50	25
09	Paint Bake Oven Fixture Components	PM PM <sub>10</sub> SO <sub>2</sub> VOC CO NO <sub>x</sub>	0.1 0.1 0.1 0.1 0.1 0.4	0.2 0.2 0.1 0.1 0.4 1.6	28
10	Woodworking Operations	PM PM <sub>10</sub>	2.0 2.0	8.8 8.8	30
11	Wood Laminating Operations	VOC Toluene Methanol Methylene Chloride	1.6 0.05 0.04 1.60	6.0 0.18 0.14 6.00	32
12	Finish-Cleaning Operations	VOC Xylene Toluene	1.6 0.03 0.01	6.0 0.10 0.05	34

\*HCFC: This includes the hydrochlorofluorocarbon compounds of HCFC-22, HCFC-141b, and HCFC-134-A, and hydrofluorocarbon compounds of HCF-125, HCF-143a, and HCF-134a.

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### **SECTION III: PERMIT HISTORY**

Permit No. 418-A was the initial air permit for this facility which was known at that time as Universal/Nolan. This permit was issued on July 22, 1977, and covered the manufacturing of wooden store fixtures. Particulate matter was permitted at <0.5 lb/hr.

Permit No. 418-AR-1 was issued to the company on April 3, 1987. The company operated under the name White Consolidated Industries, Inc. for a time, but under this permit the company name was changed to Frigidaire Commercial Products Company. The permit was revised to include all existing sources of air emissions not previously permitted. Permit emission limits were: 0.30 tpy PM, 59.53 tpy VOC, 4.10 tpy NO<sub>x</sub>, 7.77 tpy CH<sub>2</sub>Cl<sub>2</sub>, and 8.19 tpy Freon.

Permit No. 418-AR-2 was issued to Frigidaire Commercial Products Company on November 11, 1993. It was issued to document an increase in operating hours. Permit emission limits were: 0.4 tpy PM, 86.6 tpy VOC, 4.9 tpy NO<sub>x</sub>, 0.0018 tpy MDI, 10.7 tpy Freon, 10.1 tpy MeCl, and 0.003 tpy metals (Ag, Cu, Cd, ZnO.)

Permit No. 418-AOP-R0 was issued to Frigidaire Commercial Products Company on January 19, 1999. This permit allowed the facility to replaced a wet paint process with a powder paint process and listed several previously un-permitted sources. Permit limits were: PM/PM<sub>10</sub> - 12.0 tpy, SO<sub>2</sub> - 0.4 tpy, VOC - 128.2 tpy, CO - 3.2 tpy, NO<sub>x</sub> - 13.1 tpy, HCFC - 25.0 tpy, Acetone - 0.35 tpy, Ethyl Benzene - 4.50 tpy, Formaldehyde - 0.05 tpy, Glycol Ether - 60.58 tpy, Methanol - 0.60 tpy, Methyl Ethyl Ketone - 1.15 tpy, Methylene Chloride - 6.00 tpy, Toluene - 2.91 tpy, and Xylene - 45.59 tpy.

A change of ownership was accepted April 11, 2000 with the new owner listed as Carrier Refrigeration Operations - Conway Division.

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**SECTION IV: EMISSION UNIT INFORMATION**



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**SN-01**  
**Pre-Wash System - Refrigerator Components**

*Source Description*

After fabrication, the metal components for refrigerated display cases are cleaned and treated in a five-stage pre-wash system in preparation for powder painting. In stage one, the metal components are first washed with a hot aqueous solution of an alkaline cleaning agent. In stage two, the parts are rinsed with hot water. In stage three, they are treated with a phosphate solution. In stage four, the parts are again rinsed with water. In stage five, the components are immersed in an aqueous sealant solution. The parts are moved through this process by an overhead conveyor system.

Two stages of pre-wash system are heated using natural gas-fired burners. The stage one burner has a rated heat input capacity of 3.5 mmBTU/hr. The stage two burner has a capacity of 2.0 mmBTU/hr.

This system was installed in 1960.

*Specific Conditions*

1. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective February 15, 1999, (Regulation 19) and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by permitting this source at maximum capacity.

SN	Pollutant	lb/hr	tpy
01	PM <sub>10</sub>	0.1	0.4
	SO <sub>2</sub>	0.1	0.1
	VOC	0.1	0.2
	CO	0.2	0.6
	NO <sub>x</sub>	0.6	2.5

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2. Pursuant to §18.801 of the Arkansas Air Pollution Code (Regulation #18) effective February 15, 1999 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by permitting this source at maximum capacity.

SN	Pollutant	lb/hr	tpy
01	PM	0.1	0.4

3. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from SN-01 shall not exceed 5% amount opacity as measured by EPA Reference Method 9. Compliance shall be determined by Specific Condition #4.
4. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, natural gas shall be the only source of fuel used in the pre-wash system burners.

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**SN-02**  
**Touch-Up Spray Paint Booth - Refrigerator Components**

*Source Description*

On an as needed basis, a single paint booth is used for touch-up painting. Surface coatings are manually applied using an air-assisted spray gun. Components are allowed to air-dry prior to further processing. A volatile solvent is processed within the paint booth. This material is used to clean up the paint guns and associated equipment. This same cleaning agent is processed at the two spray paint booths for fixture components (SN-08). Solvent emissions at both locations are accounted for at Source SN-02.

The booth is vented to the atmosphere through a single stack equipped with a dual-bag filter arrangement for the control of over-spray.

This source was last modified in 1998.

*Specific Conditions*

5. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective February 15, 1999, (Regulation 19) and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by compliance with Specific Conditions #7.

SN	Pollutant	lb/hr	tpy
02	PM <sub>10</sub>	0.2	0.1
	VOC	16.0	8.0

6. Pursuant to §18.801 of the Arkansas Air Pollution Code (Regulation #18) effective February 15, 1999 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by compliance with Specific Conditions #9.

SN	Pollutant	lb/hr	tpy
02	PM	0.2	0.1
	Acetone	0.70	0.35
	Ethyl Benzene	0.26	0.13

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SN	Pollutant	lb/hr	tpy
	Glycol Ethers	0.40	0.20
	Methanol	0.91	0.46
	Methyl Ethyl Ketone	2.35	1.17
	Xylene	1.58	0.79
	Toluene	5.16	2.59

7. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6., the facility shall use only those products that have a VOC content equal to or less than 8.0 (paint) and 8.0 (catalyst) pounds per gallon as applied. The facility may use other paints or catalysts if the proposed product does not cause the VOC emission limits set forth in this section to be exceeded. The total amount of VOC emissions shall be limited to 8.0 tpy during any consecutive twelve month period.
  
8. Pursuant to §19.705 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation #19) and 40 CFR Part 52, Subpart E, records of the monthly VOC emissions shall be recorded in the format of Table A in Appendix A. These tables shall be maintained on a twelve month rolling total, updated monthly. These records shall be submitted in accordance with General Provision #7.
  
9. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall use only those products that meet the requirements of A and B of this Specific Condition. The facility may use other paints or catalysts if the proposed product does not cause the HAP emission limits set forth in this section to be exceeded.
  - A. The HAP limits used in this condition are based upon ethyl benzene, glycol ether, methanol, methyl ethyl ketone, toluene, and xylene. Substitutions may be made on a HAP by HAP basis such that the product being substituted has a TLV greater than or equal to the HAP being replaced. At the time of the issuance of this permit, the TLV's for ethyl benzene, methanol, methyl ethyl ketone, toluene, and xylene are 434, 262, 590, 188, and 434 micrograms per cubic meter, respectively. At the time of the issuance of this permit, the TLVs for glycol ethers including butyl cellosolve and ethylene glycol butyl ether acetate are 121 and 33 micrograms per cubic meter. Compliance with the TLV limits shall be shown using the current American Conference of Governmental Industrial Hygienists (ACGIH), "Threshold Limit Values (TLVs) and Biological Exposure Indices (BEI's) . The TLVs shall be updated by March 1 of every year.

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- B. The total amount of ethyl benzene or substituted HAP shall be limited to 0.13 tpy during any consecutive twelve-month period. The total amount of glycol ether or substituted HAP shall be limited to 0.20 tpy during any consecutive twelve-month period. The total amount of methanol or substituted HAP shall be limited to 0.46 tpy during any consecutive twelve-month period. The total amount of methyl ethyl ketone or substituted HAP shall be limited to 1.17 tpy during any consecutive twelve month period. The total amount of toluene or substituted HAP shall be limited to 2.59 tpy during any consecutive twelve month period. The total amount of xylene or substituted HAP shall be limited to 0.79 tpy during any consecutive twelve month period.
10. Pursuant to §18.1004 of the Arkansas Air Pollution Code (Regulation #18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, records of the monthly HAP emissions shall be recorded in the format of Table B in Appendix B. This table shall be maintained on a twelve month rolling total, updated monthly. These records shall be submitted in accordance with General Provision #7.

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**SN-03**  
**Combination Drying/Curing Oven - Refrigerator Components**

*Source Description*

The 5.0 mmBTU/hr natural gas fired oven serves two functions. It is used to dry the metal components for refrigerated display cases after cleaning in the pre-wash system. The oven is also used to cure the components after they have been surface coated in the powder painting system.

The natural gas combustion emissions from this source are exhausted to the atmosphere via a single vent.

This source was installed in 1998.

*Specific Conditions*

11. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by permitting this source at maximum capacity.

SN	Pollutant	lb/hr	tpy
03	PM <sub>10</sub>	0.1	0.3
	SO <sub>2</sub>	0.1	0.1
	VOC	0.1	0.2
	CO	0.2	0.5
	NO <sub>x</sub>	0.5	2.2

12. Pursuant to §18.801 of Regulation. 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by permitting this source at maximum capacity.

SN	Pollutant	lb/hr	tpy
03	PM	0.1	0.3

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13. Pursuant to §18.501 of Regulation. 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from SN-03 shall not exceed 5% amount opacity as determined by EPA Reference Method 9. Compliance shall be demonstrated by Specific Condition #14.
14. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, natural gas shall be the only fuel source for the refrigerator bake oven.

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**SN-04**  
**Urethane Foam Operations - Refrigerator Components**

*Source Description*

Cabinets and door panels for refrigerated display cases are insulated with urethane foam using a “pour-in-place” operation. Eight foaming stations are operated for this purpose.

A two-part foam formulation is used. Chemical reactants are mixed at the point of injection and then pressure-fed into the cavities within the cabinet and door panels. The mixture is semi-fluid and contains a “blowing agent” to facilitate distribution of the foam and to give the insulation a light-weight cellular structure. The foam cures within the panels.

This source was installed in 1960.

*Specific Conditions*

15. Pursuant to §19.502 of Regulation 19 and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by compliance with Specific Conditions #17.

SN	Pollutant	lb/hr	tpy
04	VOC	4.0	16.8

16. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by compliance with specific conditions #17.

SN	Pollutant	lb/hr	tpy
04	HCFC	12.8	12.8
	Glycol Ether	4.00	16.8

17. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the throughput of polymeric diphenylmethane diisocyanate (MDI) the (A-Side component) shall be limited to 1,100,000 pounds per consecutive twelve month



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period. The throughput of polyol (the B-Side component) shall be limited to 1,100,000 pounds per consecutive twelve month period.

18. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, records for MDI and polyol shall be maintained on a twelve month rolling basis, updated monthly. Such records shall be maintained on site and made available to the Department upon request. These records shall be submitted in accordance with General Provision #7.

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**SN-05**  
**Refrigerant Charging Operations - Refrigerator Products**

*Source Description*

After refrigeration coils and compressors are installed in prepared cabinets, they are charged with a refrigeration compound. To do this, the completed refrigeration system is connected to a vacuum pump system where the coil/compressor assembly is evacuated by applying a vacuum so that the refrigeration or freezer unit can be filled with the refrigerant compound. After charging, the units are leak and performance tested.

This source was installed in 1960.

*Specific Conditions*

19. Pursuant to §18.801 Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by Specific Conditions #20.

SN	Pollutant	lb/hr	tpy
05	HCFC	2.5	3.2

20. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the throughput of refrigerant shall be limited to 125,000 pounds per consecutive twelve month period.
21. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, records of refrigerant throughput rate shall be maintained on a twelve month rolling basis, updated monthly. Such records shall be maintained on site and made available to the Department upon request. These records shall be submitted in accordance with General Provision #7.

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**SN-06**  
**Finish-Cleaning Operations - Refrigerator Products**

*Source Description*

After assembly on the production lines, refrigerator and freezer products are wiped down with a volatile solvent in order to remove oil and grease. The solvent is manually applied using spray bottles and/or wiping cloths. After cleaning, the products are allowed to air-dry prior to the installation of shelves and accessories.

These activities are performed at several locations within the production building and are classified as non-point source activities.

This source commenced operation in 1960.

*Specific Conditions*

22. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by compliance with specific conditions #24.

SN	Pollutant	lb/hr	tpy
06	VOC	4.3	12.7

23. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by compliance with specific conditions #26.

SN	Pollutant	lb/hr	tpy
06	Glycol Ether	3.85	11.55
	Xylene	0.06	0.19
	Toluene	0.03	0.10

24. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the facility shall use only those products that have a VOC content equal to or less than 8.0 pounds per gallon. The facility may use other cleaning

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solvents if the proposed products do not cause the VOC emission limits set forth in this section to be exceeded. The total amount of VOC emissions shall be limited to 12.0 tpy during any consecutive twelve month period.

25. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52, Subpart E, records of the monthly VOC emissions shall be recorded in the format of Table A in Appendix A. These tables shall be maintained on a twelve month rolling total, updated monthly. Such records shall be submitted in accordance with General Provision #7.
26. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall use only those products that meet the requirements of A and B of this Specific Condition. The facility may use other paints or catalysts if the proposed product does not cause the HAP emission limits set forth in this section to be exceeded.
  - A. The limits used in this condition are based upon glycol ether, toluene, and xylene. Substitutions may be made on a HAP by HAP basis such that the product being substituted has a TLV greater than or equal to the HAP being substituted. At the time of the issuance of this permit, the TLV's for glycol ether including butyl cellosolve and propylene glycol monomethyl ether is 121 and 369 micrograms per meters cubed. At the time of the issuance of this permit, the TLV's for toluene and xylene are 188 and 434 micrograms per cubic meter. Compliance with the TLV limits shall be shown using the current American Conference of Governmental Industrial Hygienists (ACGIH), "Threshold Limit Values (TLVs) and Biological Exposure Indices (BEI's) . The TLVs shall be updated by March 1 of every year.
  - B. The total amount of glycol ether or substituted HAP shall be limited to 11.55 tpy during any consecutive twelve month period. The total amount of toluene or substituted HAP shall be limited to 0.10 tpy during any consecutive twelve month period. The total amount of xylene or substituted HAP shall be limited to 0.19 tpy during any consecutive twelve month period. The total amount of d-Limonene shall be limited to 0.05 tpy during any consecutive twelve month period.
27. Pursuant to §18.1004 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, records of the monthly HAP emissions shall be recorded in the format of Table B in Appendix B. This table shall be maintained on a twelve month rolling total, updated monthly. These records shall be submitted in accordance with General Provision

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#7.

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**SN-07**  
**Pre-Wash System and Drying Oven - Fixture Components**

*Source Description*

After fabrication, the metal components for the manufacture of fixtures, counters, and shelving are cleaned and treated in a three stage pre-wash system in preparation for painting. In stage one, the metal components are washed with a hot aqueous solution of a phosphate-based cleaning agent. In stage two, the parts are rinsed with water. In stage three, they are treated with an aqueous sealant solution. After washing, the fixtures are dried in the drying oven. The parts are moved through the washing and drying systems by an overhead conveyor system.

Natural gas emissions from the combustion of the stage one burner and the oven are vented to the atmosphere through two separate vents.

This source was installed in 1980.

*Specific Conditions*

28. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated by permitting the equipment at maximum capacity.

SN	Pollutant	lb/hr	tpy
07	PM <sub>10</sub>	0.2	0.7
	SO <sub>2</sub>	0.1	0.1
	VOC	0.1	0.3
	CO	0.4	1.7
	NO <sub>x</sub>	1.6	6.8

29. Pursuant to Section 18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated by permitting the equipment at maximum capacity.

SN	Pollutant	lb/hr	tpy
07	PM	0.2	0.7

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30. Pursuant to Section 18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall not exceed 5% opacity from this source. Compliance with these limits shall be demonstrated by Specific Condition #31.
31. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, natural gas shall be the only fuel source for this source.

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**SN-08**  
**Spray Paint Booths - Fixture Components**

*Source Description*

Two spray paint booths are used to surface coat metal components for the manufacture of fixtures, counters, and shelving. The “wet” surface coatings are manually applied using air-assisted spray guns. The parts are transferred to and from the spray booths by a conveyor. The metal components for fixtures and shelving are also coated using the powder painting system.

A volatile solvent is processed with the fixture paint booths (Source SN-08). This material is used to clean up the paint guns and associated equipment. This same cleaning agent is also processed at the touch-up paint booth for refrigerator components (Source SN-02). Solvent emissions at both locations are accounted for at Source SN-02.

The two booths are vented to the atmosphere through separate stacks. Each vent is equipped with a dual-bag filter arrangement for the control of over-spray.

This source was last modified in 1997.

*Specific Conditions*

32. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by compliance with Specific Conditions #34.

SN	Pollutant	lb/hr	tpy
08	PM <sub>10</sub>	0.4	1.5
	VOC	24.0	97.2

33. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by compliance with specific conditions #36.



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SN	Pollutant	lb/hr	tpy
08	PM	0.4	1.5
	Ethyl Benzene	1.00	4.50
	Formaldehyde	0.01	0.05
	Glycol Ether	8.00	25.20
	Xylene	12.20	45.18

34. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the facility shall use only those products that have a VOC content equal to or less than 8.0 pounds per gallon (paint) and 8.0 pounds per gallon (thinner). The facility may use other paints or thinners if the proposed products do not cause the VOC emission limits set forth in this section to be exceeded. The total amount of VOC emissions shall be limited to 97.2 tpy during any consecutive twelve month period.
35. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, records of the monthly VOC emissions shall be recorded in the format of Table A in Appendix A. These tables shall be maintained on a twelve month rolling total, updated monthly. These records shall be submitted in accordance with General Provision #7.
36. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall use only those products that meet the requirements of A and B of this Specific Condition. The facility may use other paints or thinners if the proposed products do not cause the HAP emission limits set forth in this section to be exceeded.
- A. The limits used in this condition are based upon ethyl benzene, formaldehyde, glycol ether, and xylene. Substitutions may be made on a HAP by HAP basis such that the product being substituted has a TLV greater than or equal to the HAP being substituted. At the time of the issuance of this permit, the TLV's for ethyl benzene, formaldehyde, and xylene are 434, 0.37, and 434 micrograms per cubic meter, respectively. At the time of the issuance of this permit, the TLV for butyl carbitol (glycol ether) 369 micrograms per cubic meter. Butyl carbitol is assumed to have a similar TLV to propylene glycol monomethyl ether. Compliance with the TLV limits shall be shown using the current American Conference of Governmental Industrial Hygienists (ACGIH), "Threshold Limit Values (TLVs) and Biological Exposure Indices (BEI's) . The TLVs shall be updated by March 1 of every year.

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- B. The total amount of ethyl benzene or substituted HAP shall be limited to 4.50 tpy during any consecutive twelve month period. The total amount of formaldehyde or substituted HAP shall be limited to 0.05 tpy during any consecutive twelve month period. The total amount of glycol ether or substituted HAP shall be limited to 25.20 tpy during any consecutive twelve month period. The total amount of xylene or substituted HAP shall be limited to 45.18 tpy during any consecutive twelve month period.
37. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, records of the monthly HAP emissions shall be recorded in the format of Table B in Appendix B. This table shall be maintained on a twelve month rolling total, updated monthly. These records shall be submitted in accordance with General Provision #7.

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**SN-09**  
**Paint Bake Oven - Fixture Components**

*Source Description*

The paint bake oven is a 3.5 mmBTU/hr oven natural gas fired oven used to cure the surface coatings on the metal parts used for the manufacture of counters, shelving, and fixtures. After curing, the parts are removed from the oven and allowed to cool in the production area.

It was installed in 1980.

*Specific Conditions*

38. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance with these limits shall be demonstrated by permitting the source at maximum capacity.

SN	Pollutant	lb/hr	tpy
09	PM <sub>10</sub>	0.1	0.2
	SO <sub>2</sub>	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.4
	NO <sub>x</sub>	0.5	2.2

39. Pursuant to Section 18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Compliance with these limits shall be demonstrated by permitting the source at maximum capacity.

SN	Pollutant	lb/hr	tpy
09	PM	0.1	0.2

40. Pursuant to Section 18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall not exceed 5% opacity from this source. Compliance with these limits shall be demonstrated by Specific Condition #41.

41. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, natural gas shall be the only source of fuel for the paint bake

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oven.

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**SN-10**  
**Woodworking Operations**

*Source Description*

In the woodworking operations area, raw materials including lumber, plywood, and particle board are used to fabricate wooden shelves, counter tops, and similar display items for convenience stores and ice cream parlors. The raw materials are cut, notched, drilled, and/or sanded as necessary to form the various items.

The saw stations and sanders are equipped with vent hoods. The sawdust from the woodworking operations is routed to a common cyclone for the control of particulate emissions. Emissions from the cyclone are vented to the atmosphere through a single vent.

This source was installed in 1960.

*Specific Conditions*

42. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance with these limits shall be demonstrated by proper operation of the cyclone.

SN	Pollutant	lb/hr	tpy
10	PM <sub>10</sub>	2.0	8.8

43. Pursuant to §18.801 of Regulation 18 and §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance with these limits shall be demonstrated by proper operation of the cyclone.

SN	Pollutant	lb/hr	tpy
10	PM	2.0	8.8

44. Pursuant to §18.501 of Regulation 18 and §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall not 5% opacity from this source.

45. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, weekly observations shall be conducted by a person trained, but not necessarily certified in EPA

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Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the facility shall take immediate action to identify and correct the cause of the visible emissions. After corrective action has taken place, another observation of the opacity shall be conducted in order to confirm that excess visible emissions are no longer present. Records of all visible emission observations and any corrective action taken shall be kept on site and made available to Department personnel upon request.

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**SN-11**  
**Wood Laminating Operations**

*Source Description*

Wood counter tops are assembled by laminating wooden forms. The mating surfaces of the forms are manually coated with an adhesive and then clamped together until the glue cures. These operations are performed in the main production area.

The solvent losses generated as the adhesive cures are vented through the plant's general ventilation system.

This source was constructed in 1980.

*Specific Conditions*

46. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance with these limits shall be demonstrated by compliance with Specific Conditions #48.

SN	Pollutant	lb/hr	tpy
11	VOC	1.6	6.0

47. Pursuant to §18.801 of Regulation #18 and §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance with these limits shall be demonstrated by compliance with Specific Conditions #50.

SN	Pollutant	lb/hr	tpy
11	Toluene	0.05	0.18
	Methanol	0.04	0.14
	Methylene Chloride	1.6	6.0

48. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the facility shall use only those products that have a VOC content equal to or less than 8.0 pounds per gallon. The facility may use other paints or catalysts if the proposed product does not cause the VOC emission limits set forth in this section to be exceeded. The total amount of VOC emissions shall be limited to 6.0 tpy during any consecutive twelve month period.
49. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52, Subpart E, records of the

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monthly VOC emissions shall be recorded in the format of Table A in Appendix A. These tables shall be maintained on a twelve month rolling total, updated monthly. These records shall be submitted in accordance with General Provision #7.

50. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall use only those products that meet the requirements of A and B of this Specific Condition. The facility may use other paints or catalysts if the proposed product does not cause the HAP emission limits set forth in this section to be exceeded.
  - A. The limits used in this condition are based upon toluene, methanol, and methylene chloride. Substitutions may be made on a HAP by HAP basis such that the product being substituted has a TLV greater than or equal to the HAP being substituted. At the time of the issuance of this permit, the TLV's for toluene, methanol, and methylene chloride are 188, 262, and 174 micrograms per cubic meter. Compliance with the TLV limits shall be shown using the current American Conference of Governmental Industrial Hygienists (ACGIH), "Threshold Limit Values (TLVs) and Biological Exposure Indices (BEI's) . The TLVs shall be updated by March 1 of every year.
  - B. The total amount of toluene or substituted HAP shall be limited to 0.18 tpy during any consecutive twelve month period. The total amount of methanol or substituted HAP shall be limited to 0.14 tpy during any consecutive twelve month period. The total amount of methylene chloride or substituted HAP shall be limited to 6.00 tpy during any consecutive twelve month period.
51. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, records of the monthly HAP emissions shall be recorded in the format of Table B in Appendix B. This table shall be maintained on a twelve month rolling total, updated monthly. These records shall be submitted in accordance with General Provision #7.



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**SN-12**  
**Finish-Cleaning Operations**

*Source Description*

After assembly on the production lines, finished metal and wood shelving, counters, and fixtures are wiped down with a volatile solvent in order to remove residual oil and grease. Solvent is manually applied using spray bottles and wiping cloths.

These activities are performed at various locations within the building. The emissions are vented through the plant's general ventilation system.

This source was installed in 1980.

*Specific Conditions*

52. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, this source shall not exceed the emission rates set forth in the following table. Compliance with these limits shall be demonstrated by compliance with Specific Conditions #54.

SN	Pollutant	lb/hr	tpy
12	VOC	1.6	6.0

53. Pursuant to §18.80 Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this source shall not exceed the emission rates set forth in the following table. Compliance with these limits shall be demonstrated by compliance with Specific Conditions #56.

SN	Pollutant	lb/hr	tpy
12	Xylene	0.03	0.10
	Toluene	0.01	0.05

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54. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the facility shall use only those products that have a VOC content equal to or less than 8.0 pounds per gallon. The facility may use other cleaning solvents if the proposed products do not cause the VOC emission limits set forth in this section to be exceeded. The total amount of VOC emissions shall be limited to 6.0 tpy during any consecutive twelve month period.
55. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, records of the monthly VOC emissions shall be recorded in the format of Table A in Appendix A. These tables shall be maintained on a twelve month rolling total, updated monthly. These records shall be submitted in accordance with General Provision #7.
56. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall use only those products that meet the requirements of A and B of this Specific Condition. The facility may use other paints or catalysts if the proposed product does not cause the HAP emission limits set forth in this section to be exceeded.
  - A. The limits used in this condition are based upon toluene and xylene. Substitutions may be made on a HAP by HAP basis such that the product being substituted has a TLV greater than or equal to the HAP being substituted. At the time of the issuance of this permit, the TLV's for toluene and xylene are 188 and 434 micrograms per cubic meter. Compliance with the TLV limits shall be shown using the current American Conference of Governmental Industrial Hygienists (ACGIH), "Threshold Limit Values (TLVs) and Biological Exposure Indices (BEI's) . The TLVs shall be updated by March 1 of every year.
  - B. The total amount of toluene or substituted HAP shall be limited to 0.05 tpy during any consecutive twelve month period. The total amount of xylene or substituted HAP shall be limited to 0.10 tpy during any consecutive twelve month period.
57. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, records of the monthly HAP emissions shall be recorded in the format of Table B in Appendix B. This table shall be maintained on a twelve month rolling total, updated monthly. These records shall be submitted in accordance with General Provision #7.

**SECTION V: COMPLIANCE PLAN AND SCHEDULE**

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Carrier Refrigeration Operations - Conway Division is in compliance with the applicable regulations cited in the permit application. Carrier Refrigeration Operations - Conway Division will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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**SECTION VI: PLANTWIDE CONDITIONS**

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 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 §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. 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.
4. 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:
  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
5. Pursuant to §19.303 of Regulation 19 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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6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

**Title VI Provisions**

7. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
  1. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  2. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  3. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  4. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
8. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  2. 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.
  3. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  4. 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.)
  5. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such

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appliances pursuant to §82.166.

9. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
10. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 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 the system used on passenger buses using HCFC-22 refrigerant.

11. 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.

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### **SECTION VII: INSIGNIFICANT ACTIVITIES**

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. 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 insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated December 21, 1995, and in an application amendment dated March 13, 1998.

- The following sources will be considered sources of insignificant emissions because they are air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act

Comfort Heating Device	Annual Natural Gas Usage
Gas Furnace	19, 200 mcf
Boiler	600 mcf

- The powder paint system is considered an insignificant emissions source because it is equipment used for surface coating, painting, dipping, or spraying operations and contains less than 0.4 lb/gal VOCs, has no hexavalent chromium, and emits no more than 0.1 tpy of all other HAPs.
- The powder painting system used to surface coat the metal components for refrigerated display cases is considered to be an insignificant source of emissions because the paint products used do not contain any VOCs or HAPs and the powder paint room is ventilated using a closed system. During the powder paint process, an electrostatic charge is applied to the refrigerator components and then dry paint compounds are sprayed onto the parts using air assisted spray guns. The exhaust air stream is then recirculated back to the paint room. The overspray emissions from the powder painting activities are not vented to the atmosphere.
- The pre-wash system for refrigerator components is by itself (without the natural gas fired burners) an insignificant source of emissions. The aqueous cleaning compound, phosphate treatment agent, and sealant product used in the pre-wash system contain no HAPs and only a negligible amount of VOCs.
- The pre-wash system for fixture components is by itself (without the natural gas fired

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burners) an insignificant source of emissions. The aqueous cleaning compound and sealant product used in the pre-wash system contain no HAPs and only a negligible amount of VOCs.

- The welding, brazing, and soldering activities for this facility are considered to be insignificant activities because they do not result in aggregate emissions of HAPs in excess of 0.1 tpy.

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

1. 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 emissions from loading racks or fueling operations covered under any applicable federal requirements.
2. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.
4. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
5. Consumer use of office equipment and products, not including commercial printers or business primarily involved in photographic reproduction.
6. Janitorial services and consumer use of janitorial products.
7. Internal combustion engines used for landscaping purposes.
8. Laundry activities, except for dry-cleaning and steam boilers.
9. Bathroom/toilet emissions.
10. Emergency (backup) electrical generators at residential locations.



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11. Tobacco smoking rooms and areas.
12. Blacksmith forges.
13. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
14. 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.<sup>1</sup>
15. 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.
16. Portable electrical generators that can be "moved by hand" from one location to another.<sup>2</sup>
17. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.
18. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.<sup>3</sup>
19. Air compressors and pneumatically operated equipment, including hand tools.
20. Batteries and battery charging stations, except at battery manufacturing plants.

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<sup>1</sup> 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.

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

<sup>3</sup> Brazing, 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 in this appendix.

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21. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.<sup>4</sup>
22. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and no volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
23. Equipment used to mix and package 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.
24. Drop hammers or presses for forging or metalworking.
25. 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.
26. Vents from continuous emissions monitors and other analyzers.
27. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
28. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.
29. Lasers used only on metals and other materials which do not emit HAPs in the process.
30. Consumer use of paper trimmers/binders.
31. 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 boilers delivering the steam.
32. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
33. Laser trimmers using dust collection to prevent fugitive emissions.

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<sup>4</sup> Exemptions 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.

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34. Bench-scale laboratory equipment used for physical or chemical analysis not including lab fume hoods or vents.
35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
37. Hydraulic and hydrostatic testing equipment.
38. Environmental chambers not using hazardous air pollutant gases.
39. Shock chambers, humidity chambers, and solar simulators.
40. 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.
41. Process water filtration systems and demineralizers.
42. Demineralized water tanks and demineralizer vents.
43. Boiler water treatment operations, not including cooling towers.
44. 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.
45. Oxygen scavenging (de-aeration) of water.
46. Ozone generators.
47. Fire suppression systems.
48. Emergency road flares.
49. Steam vents and safety relief valves.
50. Steam leaks.

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51. Steam cleaning operations.
52. Steam and microwave sterilizers.
53. Site assessment work to characterize waste disposal or remediation sites.
54. Miscellaneous additions or upgrades of instrumentation.
55. Emissions from combustion controllers or combustion shutoff devices but not combustion units itself.
56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).
57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
58. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
59. Residential wood heaters, cookstoves, or fireplaces.
60. Barbecue equipment or outdoor fireplaces used in connection with any residence or recreation.
61. Log wetting areas and log flumes.
62. Periodic use of pressurized air for cleanup.
63. Solid waste dumpsters.
64. 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.
65. Natural gas odoring activities unless the Department determines that emissions constitute air pollution.
66. Emissions from engine crankcase vents.
67. Storage tanks used for the temporary containment of materials resulting from an emergency reporting of an unanticipated release.

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68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
69. 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.
70. The storage, handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to the equipment only).
71. 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.
72. Tall oil soap storage, skimming, and loading.
73. Water heaters used strictly for domestic (non-process) purposes.
74. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
75. Agricultural operations, including onsite grain storage, not including IC engines or grain elevators.
76. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.

**SECTION VIII: 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 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 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:
  1. The date, place as defined in this permit, and time of sampling or measurements;
  2. The date(s) analyses were performed;
  3. The company or entity that performed the analyses;
  4. The analytical techniques or methods used;

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5. The results of such analyses; and
  6. 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 Environmental Quality  
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 §19.601 and 19.602 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 by the next business day after the occurrence. The initial report may be made by telephone and shall include:
1. The facility name and location,
  2. The process unit or emission source which is deviating from the permit limit,
  3. The permit limit, including the identification of pollutants, from which deviation occurs,
  4. The date and time the deviation started,
  5. The duration of the deviation,
  6. The average emissions during the deviation,
  7. The probable cause of such deviations,

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8. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
9. 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) by the next business day after 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 with applicable requirements as defined in Regulation #26 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. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also 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.



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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.

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19. 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:
  1. 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;
  2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  4. 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:
  1. The identification of each term or condition of the permit that is the basis of the certification;
  2. The compliance status;
  3. Whether compliance was continuous or intermittent;
  4. 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
  5. 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:

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1. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  2. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  3. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
  4. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. 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.

## **APPENDIX A**

**Table A**  
**VOC Emission Rate Calculations**

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
Supplier Name	Adhesive Type	MSDS #	Density (lb/gallon)	VOC Content (lb/gallon)	Adhesive Used (gallon/month)	VOC Content (lb/month)	VOC Emission (ton/month)
Total Emissions From Column 8							

For calculations:      Column 7 = Column 5 X Column 6  
                                  Column 8 = Column 7 X ton/2000 lb

**APPENDIX B**

