

ADEQ

ARKANSAS
Department of Environmental Quality

April 8, 2013

Steve Sharp
Safety Director/Purchasing
Nielsen Bainbridge Frame, Inc. (Pinnacle Frames and Accents, Inc.)
P.O. Box 507
Pocahontas, AR 72455

Dear Mr. Sharp:

The enclosed Permit No. 0823-AR-2 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 10/1/2012.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0823-AR-2 for the construction, operation and maintenance of an air pollution control system for Nielsen Bainbridge Frame, Inc. (Pinnacle Frames and Accents, Inc.) to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates
Chief, Air Division

ADEQ MINOR SOURCE AIR PERMIT


Permit No. : 0823-AR-2

IS ISSUED TO:

Nielsen Bainbridge Frame, Inc. (Pinnacle Frames and Accents, Inc.)
2606 Highway 67 South
Pocahontas, AR 72455
Randolph County
AFIN: 61-00001

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

Signed:



Mike Bates
Chief, Air Division

April 8, 2013

Date

Nielsen Bainbridge Frame, Inc. (Pinnacle Frames and Accents, Inc.)
Permit #: 0823-AR-2
AFIN: 61-00001

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List of Acronyms and Abbreviations

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

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Section I: FACILITY INFORMATION

PERMITTEE: Nielsen Bainbridge Frame, Inc. (Pinnacle Frames and Accents, Inc.)

AFIN: 61-00001

PERMIT NUMBER: 0823-AR-2

FACILITY ADDRESS: 2606 Highway 67 South
Pocahontas, AR 72455

MAILING ADDRESS: P.O. Box 507
Pocahontas, AR 72455

COUNTY: Randolph County

CONTACT NAME: Steve Sharp

CONTACT POSITION: Safety Director/Purchasing

TELEPHONE NUMBER: 870-892-5227

REVIEWING ENGINEER: Kimberly O'Guinn

UTM North South (Y): Zone 15: 4012554.13 m

UTM East West (X): Zone 15: 683519.80 m

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Section II: INTRODUCTION

Summary of Permit Activity

Nielson Bainbridge Frame, Inc. dba Pinnacle Frames & Accents, Inc., formerly Magee Company, owns and operates a wood picture frame manufacturing facility in Pocahontas, Arkansas. This permit modification is to change the facility's existing permit to a Minor Source due to a reduction in the facility's emissions which places the VOC emissions below the Title V threshold. This reduction is caused by a change from solvent-based coatings to water-based coatings. The facility requests to retain the right to use the solvent-based coatings on an infrequent basis. This permit modification also removes the Thinner Tank (SN-09), Lacquer Tank (SN-10), and the Dip Tank (SN-11) from service. These tanks have been either physically removed or are in the process of being removed. Permitted VOC, CO, NOx, and total HAPs will decrease by 186.9 tons/year (tpy), 0.7 tpy, 0.1, tpy, and 131.50 tpy, respectively.

Process Description

The facility receives one inch thick boards which are four to ten inches in width and eight to sixteen feet in length. The boards are fed through rip saws which cut boards into strips and then molders which cut a decorative contour on one or more sides. All of the saws and molders are connected to one of the three cyclone dust collectors (SN-01, SN-02, and SN-03). All wood waste is fed into a "hog" shredder which is also connected to the dust collection system.

The facility currently has two (2) water-based lines (SN-12 and SN-13) and one (1) oil-based line which may be used selectively as a solvent-based line (SN-05). All coatings related emission are currently bubbled and generated at sources SN-04, SN-05, SN-06, SN-12, and SN-13.

Converted Solvent-Based Process (Combination Water or Solvent-Based Coating Line)

After the lumber has been formed into molding, the long molding strips undergo either a water-based process or, on occasion as dictated by the customer, a solvent-based process for staining, coating, and painting. In the water-based process the strips are either stained and clear coated, or painted with a water-based paint. In the solvent-based process the strips are either stained and clear lacquered or painted with lacquer-based paint. The molding is stained or painted in recirculating flow coat or atomizing paint machines. Fume hoods (SN-06) are situated above the paint machines to collect and exhaust the emissions to the outside. All molding coated on SN-05 proceeds through a 2.0 MMBTU/hr natural gas fired drying oven (SN-05).

Water-Based Process (SN-12, SN-13, and SN-05)

As referenced above, nearly all the long molding strips are routed through one of the three water-based coating operations (SN-12, SN-13, and SN-05). Some molding strips may undergo the solvent-based process when dictated by the customer.

The water-based coating lines use Dellevedove (Italy) DV-100 Vacuum Coater fully enclosed recirculating application unit for water-based Primer application (this unit is fully enclosed with absolutely no emission stack to the environment).

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The finished molding is cut to the proper lengths by miter saws and assembled into picture frames. Frames that require touch-up are routed through the touch-up booths (SN-04).

Historically, approximately 20% of the lumber received at this facility required drying before processing. Pinnacle maintains a lumber drying kiln with a 1.0 MMBTU/hr natural gas fired heater (SN-07) and an 8.4 MMBTU/hr natural gas fired boiler (SN-08) that supplies additional heat to the kiln for this purpose. However, this drying requirement is not currently necessary, and therefore this process is non-operational at this time. However Pinnacle does wish to retain the process in the permit.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective November 18, 2012

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Total Allowable Emissions

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	20.1	20.3
PM ₁₀	20.1	20.3
SO ₂	0.3	0.3
VOC	95.9	98.6
CO	1.0	4.3
NO _x	1.2	5.1
Total HAP	--	9.90 (single HAP) 24.90 (combination HAP)
Methyl Isobutyl Ketone (MIK)*	1.70	†
Methanol*	5.40	
Toluene*	16.90	
Xylene*	35.50	
Ethyl Benzene*	32.14	
Ethylene Glycol*	0.80	
Isopropyl Benzene*	0.70	
Triethylamine*	0.13	
DGME* ¹	0.30	
Acetone**	94.8	
Butyl Cellulose**	3.80	6.00
PGMEA ^{2**}	1.50	2.10
DEGMME ^{3**}	0.09	0.22

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

† Emissions bubble with SN-04, 05, 06, 12, and 13. Less than 9.9 tpy single HAP and less than 24.9 tpy combined HAP.

¹Dipropylene Glycol Monomethyl Ether

²Propylene Glycol Monoethyl Ether Acetate

³Diethylene Glycol Monomethyl Ether

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Section III: PERMIT HISTORY

The Magee Company first registered with the Department in 1967, and received its first air permit (823-A) on April 10, 1987, to incorporate modifications made in both the process and control equipment since registration. This permit restricted Magee to the application of no more than nine gallons of coatings per hour and it required Magee to submit an annual VOC emissions report to the Department.

Air permit 823-AR-1 was issued November 20, 1990, to allow Magee to expand its operation. The three saw/molder cyclones were replaced with larger cyclones and a fourth spray booth was installed. The permit required Magee to submit an annual VOC emissions report by February 1 of each year. The permit also required Magee to research low solvent, low VOC, surface coating technologies and prepare and submit a report on the feasibility of using these coatings by August 1, 1991. The only significant emission permitted was VOC at 54 pounds per hour and 202.17 tons per year.

Permit 823-AOP-R0 was the first Title V operating permit issued to Magee Company under Regulation #26 and it established this facility as a major source for VOC and HAP emissions. This permit limited Magee to 243.47 tons per year (tpy) of VOC which was attributed to an increase in throughput limits, and the permitted particulate matter was reduced 44.6 tpy from the last permit due to updated emission factors for the cyclone emissions.

Permit 823-AOP-R1 was a minor modification of permit 823-AOP-R0. This permit allowed the reformulation of some of the facility's VOC containing materials, thus requiring some new HAPs to be permitted and modified the limits for existing HAPs.

Permit 823-AOP-R2 was issued on August 22, 2002. This modification allowed the facility to increase the permitted VOC, acetone, toluene, xylene and ethyl benzene emissions from the coating operations at the facility. Due to the increase in VOC emissions, the facility was classified as a major stationary source with regards to the Prevention of Significant Deteriorations (PSD) regulations for the first time.

Permit 823-AOP-R3 was issued on January 26, 2004. This permitting action was to renew the facility's existing Title V air permit. The only changes with this permitting action were revised emission limits to reflect updated emission factors. PM/PM₁₀ and Xylene emissions decreased by 0.3 tons per year (tpy) and 0.02 tpy, respectively. Permitted CO emissions increased by 3.2 tpy.

Permit 823-AOP-R4 was issued on May 13, 2009. This permitting action was to renew the facility's existing Title V air permit with a few changes. The changes were as follows:

- 1.) The Drying Kiln and Drying Kiln Boiler (SN-07 & SN-08) and the Insecticide/Fungicide Dipping process (SN-11) were currently non-operational; however, the facility retained these sources in the new permit.
- 2.) Increased the hourly emission rate for Methanol from 1.4 pound/hour (lb/hr) to 5.4 lb/hr based on current formulation information for Stains, Paints and Thinners (SN-04, SN-05 & SN-06).

Permitted annual emissions remained unchanged.

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Permit 823-AOP-R5 was issued on February 1, 2010. This permitting action was to increase annual emissions limitation for Methyl Ethyl Ketone (MEK) at the Touch-Up Spray Paint Booth (SN-04), Fan Coating and Oven (SN-05) and the Stain Booths (SN-06) due to the reformulation of all coatings and solvents used at the facility. With this modification permitted MEK emissions increased by 2.50 tons/year (tpy).

Permit 823-AOP-R6 was issued on August 5, 2011. This permitting action was to install equipment necessary for the application of water-based coatings (SN-12). The water-based coating operation includes a water-based sealer applicator, water-based top coat applicator and two electric curing ovens. Emissions from this source were bubbled with all other existing coating emissions defined at sources SN-04, SN-05, and SN-06. Permitted emissions remained unchanged.

Permit 823-AOP-R7 was issued on March 8, 2012. This permitting action was to install and operate a second line of process equipment to apply water-based primer, sealer and top coat (SN-13). Emissions from this source were bubbled with all other existing coating emissions. The additional line (SN-13) required an increase of 3.1 tons/year (tpy) in Butyl Cellosolve. However, VOC and HAP emissions remained unchanged.

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Section IV: EMISSION UNIT INFORMATION

Specific Conditions

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

SN	Description	Pollutant	lb/hr	tpy
01	Cyclone	PM ₁₀	6.6	6.6
02	Cyclone	PM ₁₀	6.6	6.6
03	Cyclone	PM ₁₀	6.6	6.6
04	Line #1 Coating Operations and Oven	PM ₁₀	0.1	0.1
05		SO ₂	0.1	0.1
06		VOC(coatings)	94.8	95.0
12		VOC(combustion)	0.1	0.1
13		CO	0.2	0.8
		NO _x	0.2	0.9
07	Lumber Kilns	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC(combustion)	0.1	0.1
		VOC(lumber drying)	0.8	3.2
		CO	0.1	0.4
		NO _x	0.1	0.5
08	Lumber Kilns Boiler	PM ₁₀	0.1	0.3
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.7	3.1
		NO _x	0.9	3.7

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

SN	Description	Pollutant	lb/hr	tpy
01	Cyclone	PM	6.6	6.6
02	Cyclone	PM	6.6	6.6
03	Cyclone	PM	6.6	6.6

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SN	Description	Pollutant	lb/hr	tpy
04 05 06 12 13	Line #1 Coating Operations and Oven	PM	0.1	0.1
		Acetone**	94.80	69.00
		PGMEA**	1.50	2.10
		DEGMME**	0.09	0.22
		MIK*	1.70	9.90 (single HAP)
		Methanol*	5.40	
		Toluene*	16.90	
		Xylene*	35.50	
		Ethyl Benzene*	32.14	
		Ethylene Glycol*	0.80	24.90 (combination HAP)
		Butyl Cellusolve*	3.80	
Isopropyl Benzene*	0.70			
Triethylamine*	0.13			
DGME*	0.30			
07	Lumber Kiln	PM	0.1	0.1
08	Lumber Kiln Boiler	PM	0.1	0.3

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

SN	Limit	Regulatory Citation
01, 02, 03	10%	§18.801

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18 §18.901 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-01 Conditions

6. The maximum allowable production at the facility is 16,000,000 board feet (bf) of lumber at the facility per consecutive 12 month period. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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7. The permittee shall maintain monthly and annual records of the quantity of lumber processed at this facility which demonstrate compliance with the limits listed in Specific Condition #6. By the 15th of each month a monthly report shall be prepared containing the individual records for each of the last twelve months and the total of the twelve months. The permittee shall keep the records onsite, and make the records available to Department personnel upon request. A twelve consecutive month total and each month's data shall be submitted to the Department in accordance with General Condition #5. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-04, SN-05, SN-06, SN-12, and SN-13 Conditions

8. The facility shall not exceed 95.0 tons per year VOC from the Line #1 Coating Operations (SN-04, SN-05, SN-06, SN-12, and SN-13) in any consecutive twelve month period. [§19.705 of Regulation #19, and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
9. The permittee shall maintain monthly records of coating usages from the coating operations in order to calculate emissions to demonstrate compliance with Specific Conditions #8. These records shall be updated no later than the fifteenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. [§19.705 of Regulation #19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee shall maintain monthly and rolling 12-month records of all the VOCs from VOC containing materials (paints, solvents, primers, thinners, coatings, etc.) purchased which demonstrate compliance with the limits referenced in Specific Condition #8. The permittee shall calculate emissions based on the assumption that 100% of the VOC purchased is emitted. These records shall list all materials by product name and number. The records shall list the pounds per gallon of each material. The total VOC shall be recorded as percent by weight. The records shall also contain a monthly and annual summary of the total gallons of each material purchased and the total VOC emitted. The monthly and annual total of materials purchased shall be in gallons. The monthly total VOC emissions shall be listed in pounds. The annual total VOC emissions shall be listed in tons. Annual usages shall be the most recent twelve consecutive months of operation. These records shall be maintained on site and be made available to ADEQ personnel upon request. A new annual emission report shall be generated each month. The latest twelve consecutive month emission report shall be submitted to the Department in accordance with General Condition #5. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]
11. The facility shall not exceed 9.9 tpy for any single HAP and 24.9 tpy of any combination HAP from the Line #1 Coating Operations (SN-04, SN-05, SN-06, SN-12, and SN-13) in any consecutive twelve month period. [§18.1004 of Regulation #18, §19.705 of Regulation #19, and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

12. The permittee shall maintain monthly records of coating usages from the coating operations in order to calculate emissions to demonstrate compliance with Specific Conditions #11. These records shall be updated no later than the fifteenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. [§19.705 of Regulation #19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
13. The permittee shall maintain monthly and rolling 12-month records of all the HAPs from VOC containing materials (paints, solvents, primers, thinners, coatings, etc.) purchased which demonstrate compliance with the annual limits referenced in Specific Condition #11. The permittee shall calculate emissions based on the assumption that 100% of the HAPs purchased are emitted. These records shall list all materials by product name and number. The records shall list the pounds per gallon of each material. Each HAP shall be recorded as percent by weight. The records shall also contain a monthly and annual summary of the total gallons of each material purchased and each HAP emitted. The monthly and annual total of materials purchased shall be in gallons. The monthly emissions for each HAP shall be listed in pounds. The annual emissions for each HAP shall be listed in tons. Annual usages shall be the most recent twelve consecutive months of operation. These records shall be maintained on site and be made available to ADEQ personnel upon request. A new annual emission report shall be generated each month. These records shall be incorporated into the VOC report required in Specific Condition #10. The latest twelve consecutive month emission report shall be submitted to the Department in accordance with General Condition #5. [§18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
14. The permittee shall calculate acetone usage and emissions and include these emissions in the monthly reports required by Specific Condition #10. [§18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. In the event the permittee wishes to substitute one material for another containing different HAP contents or different HAP compounds, the following requirements must be met.
The permittee shall use the following table to determine the allowable weight percent of HAP which can be used in the paints and adhesives. Compliance shall be demonstrated by using ACGIH TLV values as listed on current MSDS forms, or in the ACGIH handbook of Threshold Limit Values (TLVs). If no TLV is available from these sources, the facility may request the use of an alternate value from the Department. The permittee shall once-per-year, on or before January 1, research and update, as necessary, TLV values for all HAPs in use. Additionally, the permittee shall update specific TLV values on the subsequent monthly emissions record if notified in writing by the Department of such changed values. HAPS which may be present but which act as reactants and are not emitted shall not be subject to the requirements of the following table. The permittee shall, upon request from the Department, demonstrate to the Department's satisfaction

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that a particular HAP used at the facility should be classified as a reactant or not, by acquiring vendor information, lab testing, or other sufficient methods.

HAP-TLV Table

Maximum Allowable HAP Content (lb/gal)	Minimum TLV (mg/m ³)
6.58	486.80
5.5	406.90
4.5	332.92
3.5	258.94
2.5	184.95
1.5	110.97
0.5	36.99
0.75	55.49
0.5	36.99
0.25	18.50
0.2	14.80
0.1	7.40

If this option is employed, the permittee shall continue to follow the record keeping requirements set forth in Specific Condition #13 in order to show that total HAP emissions are less than or equal to 24.90 tons/year. The permittee may use oil-based or water-based coatings as long as the HAP content complies with the requirements of this condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-07 and SN-08 Conditions

16. Visible emissions from the lumber kiln (SN-07) or the lumber kiln boiler (SN-08) shall not exceed an opacity of 5% as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by compliance with Specific Condition #17 when the source is in operation. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. Pipeline quality natural gas shall be the only fuel used at SN-07 and SN-08. The natural gas process equipment is permitted for their maximum capacity. Therefore, no recordkeeping of natural gas usage is required. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee shall not exceed 4,500,000 board feet (bf) of lumber dried in the kiln during any twelve consecutive month period when the source is in operation. [Regulation No. 19 §19.705 A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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19. The permittee shall maintain monthly and annual records of the quantity of lumber dried in the kiln (SN-07) to demonstrate compliance with Specific Condition #18. The permittee shall update the records by the fifteenth day of the month and a monthly report shall be prepared containing the individual records for each of the last twelve months and the total of the twelve months. The permittee shall keep the records onsite, and make the records available to Department personnel upon request. A twelve consecutive month total and each month's data shall be submitted to the Department in accordance with General Condition #5 when the source is in operation. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated October 1, 2012.

Description	Category
N/A	

Nielsen Bainbridge Frame, Inc. (Pinnacle Frames and Accents, Inc.)
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Section VI: GENERAL CONDITIONS

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

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

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5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) calendar days after the completion of testing. [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee shall provide: [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19 §19.303 and/or Regulation 18 §18.1104 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19 §19.601 and/or Regulation 18 §18.1101 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and

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

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

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16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]
19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
 - a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

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

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facilities total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
 - a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;
 - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
 - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
 - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

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

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21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
 - a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

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

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to Nielsen Bainbridge Frame, Inc. (Pinnacle Frames and Accents, Inc.), P.O. Box 507, Pocahontas, AR, 72455, on this 5th day of April, 2013.

Pam Owen

Pam Owen, AAI, Air Division