ADEQ
MINOR SOURCE
AIR PERMIT

Permit #: 1662-AR-2

IS ISSUED TO:

Central Moloney, Inc. - Components Plant
5500 Jefferson Parkway
Pine Bluff, AR 71602
Jefferson County
AFIN: 35-00304

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

Signed:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE:	Central Moloney, Inc. - Components Plant
AFN:	35-00304
PERMIT NUMBER:	1662-AR-2
FACILITY ADDRESS:	5500 Jefferson Parkway Pine Bluff, AR 71602
COUNTY:	Jefferson
CONTACT POSITION:	Paul Skuban, Environmental Manager
TELEPHONE NUMBER:	(870) 534-5332
REVIEWING ENGINEER:	Amanda Holloway
UTM North-South (X):	584.3
UTM East-West (Y):	3902.2

SECTION II: INTRODUCTION

Summary

The Components Division of Central Moloney, Inc. (CMI) currently operates a manufacturing facility in the city of Pine Bluff (Jefferson County), Arkansas. The site, which is ordinarily referred to as the "Components Plant," is physically located at 5500 Jefferson Parkway. CMI manufactures parts for electrical distribution equipment. The finished products include a variety of components for electrical transformers and switch gear.

The facility is modifying their existing permit to correct current air permit exceedances and bring CMI into full compliance with state regulations. In addition, this modification will incorporate the mold preparation process (SN-25) as an emission source, establish permit conditions that allow maximum operational flexibility by implementing HAP formulation limits based on Threshold Limit Values (TLV), increase permitted material throughput rates and emission limitations to provide for future growth, establish emission limits for HAPs that are below the "major source" thresholds and allow the addition of three new casting-curing ovens (SN-26 through SN-28). The plant-wide permitted annual emission rates are increasing 5.6 tons/yr for VOC and 23.8 tons/yr for Acetone while decreasing 0.24 tons/yr for combined HAPs.

Process Description

The manufacturing operations at the Pine Bluff facility are properly categorized using Standard Industrial Classification (SIC) Code 3612 (accessories for electrical transformers and the electric utility industry) and SIC Code 3613 (accessories for electrical switch gear).

The Components Plant is primarily used to support production at the main CMI facility (referred to as the "Transformer Plant"), which is also located in the city of Pine Bluff. The Components Plant is the major supplier of the electrical parts and components processed at the Transformer Plant. In addition, the products made at the subject facility are also commercially distributed to electric utilities, other manufacturers of electrical equipment products and other vendors.

The production operations at the Components Plant consist of the following processes: the fabrication and preparation of metal studs (including adhesive application and solvent cleaning); an epoxy/polyurethane casting operation for the manufacture of large and odd-shaped transformer bushings; two press operations ("thermoset transfer molding" and "thermoplastic injection molding") for the production of relatively small, high-volume molded electrical components; three painting operations; component assembly; product inspection and packaging; and, several miscellaneous manufacturing activities.

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Fabrication of Metal Studs: CMI utilizes copper and aluminum studs for the production of transformer bushings and other parts for electrical equipment. Certain components are manufactured on-site. (Other items are purchased from vendors.) The metal stock is cut, formed, shaped and/or threaded to form a variety of studs and inserts. The metal fabrication operations are primarily mechanical in nature. Some of these activities involve the use of non-volatile cutting fluids, lubricants and metal-working fluids. The operations are ventilated via the plant's general heating, ventilation and air conditioning (HVAC) system. The metal fabrication operations are an insignificant source of air emissions.

Stud Cleaning Operations: The metal studs and inserts are cleaned prior to use. A dip tank/rinse tank system is operated for this purpose. A non-halogenated solvent is utilized as the cleaning agent.

The dip tank/rinse tank system operates as follows: The dirty metal studs are placed in a wire basket. The basket is then immersed in the dip tank via a hoist. Residual oil and grease on the components are removed via the circulating bath of hot solvent. Once the studs are clean, the basket is lifted out of the dip tank and transferred to the rinse tank. The components are then immersed in a hot water bath for finish cleaning. After rinsing, the parts basket is hoisted out of the second tank. The clean metal studs are then allowed to air dry prior to use. The dip tank and rinse tank each have a capacity of approximately 180 gallons. The two baths are heated electrically. The dip tank/rinse tank system is designated as SN-22. The tanks are not vented to the atmosphere. The fugitive solvent emissions from the degreasing operation are exhausted via the plant's general ventilation system.

A limited amount of metal studs (and other components) are cleaned via hand-wiping. A volatile solvent, methyl ethyl ketone, is used for this purpose. The cleaning agent is manually applied using spray bottles and/or wiping cloths. After degreasing, the components are allowed to air dry prior to use. The hand-wipe cleaning operations are performed at multiple locations on the plant floor. The fugitive solvent emissions from these activities are included in SN-22 (dip tank/rinse tank system).

Stud Preparation Process: After cleaning, the metal studs are primed with an adhesive material. The coating is applied by hand using a paint brush. CMI utilizes two different adhesive primers to prepare the components. Some of the primed studs are subsequently allowed to "air cure" at room temperature, whereas other studs are placed in an electric oven (SN-20) for curing. The prepared studs and inserts are later utilized in several manufacturing operations. The stud preparation process is designated as SN-23. Application of the adhesive primers is performed on the plant floor. The fugitive emissions from this activity are exhausted via the facility's HVAC system.

Certain metal studs are etched prior to priming. The etching process provides a better surface for the adhesive bond. Small quantities of a non-volatile etchant are utilized. The etching operation is an insignificant source of air emissions

Epoxy Casting Operations: The casting operations are used to manufacture large and odd-shaped transformer bushings and related parts. Epoxy and polyurethane resins are mixed, cast and then cured during component fabrication. These operations are performed on a batch basis.

The resin mixtures for the casting operations are prepared in the Mix Room. The raw materials consist of liquid epoxy or polyurethane resins, liquid hardeners and/or accelerators, and powdered filler compounds. CMI processes a variety of these materials during the casting operations. The resin components are combined in a small metal mix pot. The filler materials are weighed and dispensed by hand, whereas the resin and hardener are metered from drums. The mixing station is situated next to a wall vent. It provides general ventilation and removes any nuisance dust generated when handling the filler materials. The epoxy mixing operations are designated as SN-17. The wall vent is exhausted directly to the atmosphere. The unit is equipped with a high-density mesh filter for dust control.

The mix pot is sealed once all the raw materials have been added. The resin, hardener and filler are then consolidated via mechanical mixing into a uniform mixture. During mixing, a vacuum pump system is used to remove entrapped air and moisture from the resin solution. The resin is subsequently poured into pails and taken to the Casting Department for processing. The vacuum pump system is designated as SN-18. The pump is vented directly to the atmosphere. Any VOC emissions from the vacuum system are accounted for at the casting curing ovens.

In the Casting Department, the prepared epoxy or polyurethane resin mixture is poured into pre-heated steel molds. Metal studs and/or other items may also be inserted into the molds depending on the component being manufactured. The molds are then placed in electrically-heated ovens for curing. CMI currently features nine such ovens (SN-07 through SN-14 and SN-21). Each casting curing oven is exhausted directly to the atmosphere via a separate vent. The Components Plant plans to install three new casting curing ovens (SN-26 through SN-28) to be used in conjunction with the existing units.

The molds are removed from the ovens once the resin has cured. After cooling, the transformer bushings are manually dislodged from the molds. The batch casting operation is then repeated. The cast components are subsequently cured for an additional period of time ("post cure" process). The Components Plant has a large walk-in oven for this purpose. This electrically-heated unit is designated as SN-20. The "thermoset post curing oven" is exhausted directly to the atmosphere. After final curing, the large and odd-shaped transformer bushings are transferred to the manual paint booth (SN-04) or the hand paint area (no SN). Unpainted cast components proceed directly to the assembly or inspection area. The air emissions from the post-curing oven

(SN-20) are accounted for at the existing nine casting-curing ovens (SN-07 through SN-14 and SN-21).

During the casting operations, "release agents" are applied to the metal molds. The purpose of these silicone-based coatings is to enable the molded plastic components to be cleanly dislodged from the molds after curing. CMI uses several different release agents. The products are applied using a paintbrush or aerosol spray cans. The mold preparation process is designated as SN-25. Application of the release agents is performed on the plant floor. The fugitive VOC emissions from this activity are exhausted via the facility's general ventilation system. (SN-25 is a new source. It was previously permitted as an insignificant activity.)

Plastic Molding Operations: Two different press operations are used to manufacture a variety of relatively small, high-volume transformer bushings and other components for electrical equipment. These batch processes are the "thermoset transfer molding" and the "thermoplastic injection molding" operations. Said activities are described below:

> **Thermoset Transfer Molding Operations**: This operation involves the use of transfer press machines. Two molding compounds are processed during the thermoset operations. These materials are epoxy bricks and a fiberglass-reinforced polyester resin. The molding compounds are prepared for use by pre-heating the materials in a high-frequency radio-wave oven.
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> The thermoset press operation is performed as follows: A steel mold equipped with internal electric heating elements is placed in a particular press machine. The heaters are then turned on to pre-heat the mold. Each mold contains one or more cavities. After pre-heating, a primed metal stud is inserted into each cavity. The two halves of the mold are then closed by the press machine. Next, the softened molding compound (epoxy or polyester resin) is loaded into the transfer chamber of the press. Mechanical rams then force the material into the mold cavities. The mold remains closed for a certain period of time to cure the molding compound. Afterwards, the components are manually removed from the mold and the process is repeated. The molded parts are subsequently cured for an additional period of time ("post-cure") in the walk-in oven (SN-20). The components are then transferred to the automatic paint booth (SN-16) or sent directly to the inspection and packaging area. Ventilation for the press machines is provided by the facility's HVAC system. Any fugitive emissions generated during the thermoset molding operations are insignificant.
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> **Thermoplastic Injection Molding Operations**: This operation involves the use of injection molding machines. The primary raw materials for the process are pelletized thermoplastic compounds. The plastic pellets are transferred from storage to the press machines via a closed pneumatic system.

The thermoplastic press operations are performed as follows: A steel mold is placed in a particular press machine. Each mold contains one or more cavities. Plastic pellets are also placed in the machine's internal feed hopper. Electric heaters are used to melt the plastic pellets in the press machine. The molten material is then injected into the mold cavities. The plastic is then cured for a certain period of time. Afterwards, the mold automatically opens and the parts are ejected into a bin. The manufacturing process is then repeated. The molded components are then transferred to the automatic paint booth (SN-16) or sent directly to the inspection and packaging area. Ventilation for the thermoplastic press machines is provided by the facility's HVAC system. Any fugitive air emissions generated during the injection molding operations are insignificant.

The thermoplastic molding operations generate scrap plastic ("runners"). This material is accumulated in bins for recycling. The scrap is periodically processed through a mechanical grinder unit. The ground plastic is then reused in the thermoplastic press machines. The scrap plastic grinder is designated as SN-05. The particulate (dust) emissions from the grinder are controlled using a dust cyclone and baghouse in series. (Certain defective molded plastic components are also recycled using the grinder.)

Mold release agents may be utilized during the thermoset transfer molding and thermoplastic injection molding operations. The fugitive VOC emissions from the mold preparation process (SN-25) are exhausted via the plant's general ventilation system.

Painting Operations: Some of the transformer bushings are coated with an electrically-conductive paint during the fabrication process. CMI uses a two-part paint formulation (i.e., primer plus catalyst). Several other specialty coatings are also processed. A volatile solvent, methyl isobutyl ketone, is used to thin the coatings. This material is also utilized for general clean-up of the painting equipment. The Components Plant features two spray paint booths ("manual" and "automatic") plus a hand painting area for the surface coating of transformer bushings.

The large and odd-shaped components made in the casting operations are primarily painted in the manual paint booth. It is designated as SN-04. This unit is called the "manual" booth because the components are manually moved in and out of the booth on wheeled carts. The parts are painted using an air-assisted spray gun. The components are then cured in one of two electrically-heated ovens. The painted parts are subsequently inspected and packaged for distribution. The paint booth is exhausted directly to the atmosphere. The vent is equipped with a high-density filter for the control of paint over-spray.

The two paint curing ovens, Unit #1 and Unit #3, are designated as SN-03 and SN-24, respectively. They are operated on a batch basis. Each oven is vented directly to the

atmosphere. Any VOC emissions from these two units are accounted for at SN-04 (manual paint booth).

A limited number of the large transformer bushings are processed in the hand painting area (no SN). The components are manually coated using a paintbrush. The parts are then cured in the oven (SN-03) for the manual paint booth. The painted components are subsequently inspected and packaged. The hand painting activities are performed on the plant floor. The air emissions from the hand painting activities are accounted for at the manual paint booth (SN-04).

The relatively small, high-volume components made in the thermoset press and thermoplastic press operations are surface coated in the automatic paint booth. It is designated as SN-16. This equipment is called the "automatic" booth because the components are moved through the unit on a hanging conveyor. The parts are painted using an air-assisted spray gun. The parts are then placed in an electrically-heated oven for curing. The painted components are subsequently inspected and packaged. The automatic paint booth is exhausted directly to the atmosphere. The exhaust vent is equipped with a high-density mesh filter for the control of over-spray.

The paint curing oven (Unit #2) associated with the automatic paint booth is designated as SN-15. It is operated on a continuous basis. Oven #2 is vented directly to the atmosphere. Any VOC emissions from this equipment are accounted for at SN-16 (automatic paint booth).

Assembly Operations: Certain components made by CMI require some assembly. A variety of pre-manufactured plastic and metal parts are manually put together to produce the finished products. The assembly operations are primarily mechanical in nature. Small quantities of solder, adhesives, lubricants and other materials are processed. General ventilation for these activities is provided by the facility's HVAC system. Any fugitive emissions generated during the assembly operations are insignificant.

Inspection and Packaging Operations: After fabrication (and coating for certain products), the transformer bushings and other components are visually inspected. Defective parts are recycled or scrapped. The finished products are then packaged in cardboard boxes or are shrink-wrapped in plastic. The components are then stored in a warehouse pending retail distribution or shipment to CMI's Transformer Plant. The inspection and packaging operations are insignificant sources of air emissions.

Miscellaneous Operations and Emission Sources: The Components Plant features several miscellaneous production operations and emission sources. These items are described below:

> **Production of Fuses and Conductors**: CMI manufactures fuses for transformers and other electrical equipment. These components are fabricated by soldering tin wire onto tin-plated and bare copper terminals. The fuses are then packaged for sale. The solder

contains a volatile resin core. The soldering activities are designated as SN-02. The components are soldered under a vent hood that is exhausted directly to the atmosphere.

In addition, certain products require the use of tin-plated conductors. The metal plating activities are performed at one of two electrically-heated solder pot stations. The conductors are plated by briefly immersing them in a bath of molten tin. Any excess molten metal is then brushed or wiped off the components. Once cool, the plated conductors are packaged for shipment. The metal plating activities are also included in SN-02. The solder pots are situated under a vent hood that is exhausted directly to the atmosphere. Fuse production and the plating of electrical conductors are both performed on a limited, batch basis. The vent hoods are utilized simply for employee comfort. The soldering activities (SN-02) are insignificant sources of air emissions.

Stud Reclamation Process: Defective transformer bushings are scrapped. The metal studs in these components are reclaimed for reuse. An electric oven is operated for this purpose. The scrapped components are heated in the oven so that the molded epoxy portion of the bushing can be separated from the enclosed stud. After heating, the softened epoxy is manually stripped from the metal insert. The reclaimed studs are then sent to the dip tank/rinse tank system (SN-22) for cleaning prior to reuse. The stud reclamation oven is designated as SN-01. The unit is vented directly to the atmosphere. Stud reclamation is performed on a limited, batch basis. The electric oven is used simply to soften the epoxy molding. The unit is an insignificant source of air emissions.

Research and Development Activities: CMI performs a limited amount of research and development (R&D) activities involving different epoxy and polyurethane resin formulations. Samples of various combinations of resins, hardeners and fillers are mixed and then molded into test bars. After physical testing, the filler content of the samples is determined by burning off the epoxy resin until only the inert filler material remains. An electrically-heated oven is operated for this purpose. The R&D burn-off oven is designated as SN-19. It is vented directly to the atmosphere. The unit is operated on a limited, batch basis. The unit is an insignificant source of air emissions.

Machine Shop Operations: A small machine shop supports the manufacturing departments at the Components Plant. The shop activities include metal milling, turning, sawing, drilling, brazing, welding, sandblasting and tin plating. Ventilation for the machine shop is provided by the facility's general HVAC system (with the exception of the vent hood (SN-02) for the tin solder pots). Any fugitive air emissions generated during the shop activities are insignificant.

Emissions of regulated air pollutants are generated during the manufacturing operations at the

Components Plant. They result from the following activities: the degreasing of metal studs in the dip tank/rinse tank system (SN-22); the curing of primed metal studs (SN-23); the surface coating of transformer bushings in the two spray paint booths and hand-painting area (SN-04 and SN-16); the grinding of scrap plastic prior to its recycling (SN-5); the curing of cast epoxy components in nine existing electrically-heated ovens (SN-7 through SN-14 and SN-21) and three proposed electric ovens (SN-26 through SN-28); the handling of powdered filler materials for epoxy resin mixtures (SN-17); the hand-wipe solvent cleaning of miscellaneous components (SN-22); and, the application of mold release agents during the casting and molding operations (SN-25).

Regulations

CMI is subject to regulations under the *Arkansas Air Pollution Control Code* (Air Code) and the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (SIP).

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	4.3	3.6
PM_{10}	4.3	3.6
VOC	84.4	60.8
Acetone*	65.14	24.0
Total HAPs	65.14	24.0

*Non-VOC hydrocarbons - not included in VOC total.

SECTION III: PERMIT HISTORY

Permit 1662-A
CMI currently operates two industrial facilities within the city of Pine Bluff. These sites are the Components Plant on Jefferson Parkway and the (main) Transformer Plant on West 6th Avenue. The two facilities have different manufacturing processes and are not located on contiguous or adjacent properties.

Historically, both plants were covered under the same air permit (No. 370-AR-1). In February 1995, CMI requested that the Department issue an individual permit for each site. The Air Division subsequently approved separation of the permit coverage for the two facilities. Air Permit No. 1662-A for the Components Plant was issued in October 1995. (Air Permit No. 370-AR-2 for the Transformer Plant became effective in December 1995).

Permit 1662-AR-1 was a modification that was issued on June 2, 2000. This modification allowed the facility to increase permitted material through-put rates and allowed CMI to construct and operate a new paint curing oven. The electrically-heated oven is operated in conjunction with the manual spray paint booth.

SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

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

SN	Description	Pollutant	lb/hr	tpy
03	Paint Curing Oven #1	Included in SN-04 and SN-16 Emissions		
04 and 16	Manual Spray Paint Booth and Automatic Spray Paint Booth (combined)	VOC	48.0	28.0
05	Scrap Plastic Grinder	PM_{10}	3.0	2.4
06	Vapor Degreaser	Source Deleted		
07 thru 14, 21, 26, 27, 28	Casting Curing Ovens (twelve)	VOC	19.2	9.6
15	Paint Curing Oven #2	Included in SN-04 and SN-16 Emissions		
17	Epoxy Mixing Operations	PM_{10}	1.3	1.2
18	Vacuum Pump System	Accounted for at SN-07 thru SN-14, SN-21 and SN-26 thru SN-28		
20	Thermoset Post Curing Oven	Accounted for at SN-07 thru SN-14, SN-21 and SN-26 thru SN-28		
22	Dip Tank / Rinse Tank System	VOC	9.2	20.0
23	Stud Preparation Process	VOC	4.0	1.6
24	Paint Curing Oven #3	Accounted for at SN-04		
25	Mold Preparation Process	VOC	4.0	1.6

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

SN	Description	Pollutant	lb/hr	tpy
04 and 16	Manual Spray Paint Booth and Automatic Spray Paint Booth (per source)	Total HAP	48.0	*
		Acetone	48.0	*
05	Scrap Plastic Grinder	PM	3.0	2.4
17	Epoxy Mixing Operations	PM	1.3	1.2
22	Dip Tank / Rinse Tank System	Total HAP	9.14	*
		Acetone	9.14	*
23	Stud Preparation Process	Total HAP	4.00	*
		Acetone	4.00	*
25	Mold Preparation Process	Total HAP	4.00	*
		Acetone	4.00	*

* Pollutant subject to plant-wide emission limit for HAPs and other regulated air contaminants emitted during use of surface coatings, adhesives, cleaning solvents and mold release agents.

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

SN	Limit	Regulatory Citation
05	5	18.501
17	20	19.503

4. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.

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

SN-04 and SN-16 Conditions – Spray Paint Booths – Surface Coatings

6. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 5,000 gallons of surface coatings (epoxy primers, catalysts and specialty products) at sources SN-04 and SN-16 combined, during any consecutive 12 month period.

7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition 6. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on-site, and shall be made available to Department personnel upon request.

SN-04 and SN-16 Conditions – Spray Paint Booths – Paint Solvents and Thinners

8. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 2,000 gallons of paint solvents and thinners at sources SN-04 and SN-16 during any consecutive 12 month period.

9. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Conditions 8. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.

SN-05 Conditions – Scrap Plastic Grinder

10. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 240,000 lbs of scrap plastic at source SN-05 during any consecutive 12 month period.

11. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition 10. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.

SN-07 through SN-14, SN-21 and SN-26 through SN-28 Conditions – Casting Curing Ovens

12. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 24,000 gallons of epoxy resin at sources SN-07 through SN-14, SN-21, and SN-26 through SN-28 combined during any consecutive 12 month period.

13. 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 permittee shall not use an epoxy resin, hardener or accelerator with a VOC content greater than 0.8 lb/gal at sources SN-07 through SN-14, SN-21, and SN-26 through SN-28.

14. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Conditions 12 and 13. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.

SN-17 Conditions – Epoxy Mixing Operations

15. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 450,000 lb of powdered filler materials at source SN-17 during any consecutive 12 month period.

16. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition 15. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.

SN-22 Conditions – Dip Tank/Rinse System

17. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 3,000 gallons of non-halogenated solvent in the dip tank/rinse tank system at source SN-22 during any consecutive 12 month period.

18. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition 17. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.

SN-22 Conditions - Miscellaneous Solvent Cleaning Activities

19. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 2,000 gallons of non-halogenated solvent for miscellaneous cleaning activities at source SN-22 during any consecutive 12 month period.

20. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition 19. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.

SN-23 Conditions – Stud Preparation Process

21. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 400 gallons of adhesive at source SN-23 during any consecutive 12 month period.

22. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition 21. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.

SN-25 Conditions – Mold Preparation Process

23. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 400 gallons of mold release agents at source SN-25 during any consecutive 12-month period.

24. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition 23. Records shall be updated by the fifteenth day of

the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.

Plantwide Conditions

25. 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 permittee shall not use any surface coating, thinner, adhesive, primer, cleaning solvent or mold release agent at this facility with a VOC content greater than 8.00 lb/gal. Compliance with this condition shall be demonstrated by compliance with Plantwide Condition 30.

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 permittee shall not use any surface coating, thinner, adhesive, cleaning solvent or mold release agent at this facility which contains more than 8.00 lb/gal of total HAPs and/or other air contaminants. Compliance with this condition shall be demonstrated by compliance with Plantwide Condition 31.

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, the permittee shall not exceed the maximum HAP and air contaminant content limits for any surface coatings, thinners, adhesives, cleaning solvents or mold release agents used at the facility as listed in the following table. Linear interpolations of the table are allowed.

Minimum TLV versus Maximum Content limits for HAPs and/or Other Air Contaminants		
Minimum TLV (mg/m^3)	**Maximum Content (wt %)**	**Maximum Content for each TLV range (lb/gal)**
187.5	100	8.0
168.8	90	7.2
150.0	80	6.4
131.3	70	5.6
112.5	60	4.8
93.8	50	4.0
75.0	40	3.2
56.3	30	2.4
37.5	20	1.6
18.8	10	0.8
9.38	5	0.4

Minimum TLV versus Maximum Content limits for HAPs and/or Other Air Contaminants		
Minimum TLV (mg/m^3)	**Maximum Content (wt %)**	**Maximum Content for each TLV range (lb/gal)**
1.88	1.0	0.08
0.94	0.50	0.04
0.19	0.10	0.008
0.02	0.01	0.0008

28. 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 permittee shall maintain records of the ACGIH TLVs, as listed on the current Material Safety Data Sheets (MSDSs) or in the most recent version of the ACGIH handbook titled "Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs)," for each surface coating, thinners, adhesive, and/or cleaning solvent used at the facility. The concentration of each HAP or other air contaminant in lb/gal and the corresponding TLV should be noted on these documents. The records shall be maintained in a spreadsheet, database or other well-organized format. These records shall be kept on-site and made available to Department personnel upon request.

29. 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 total amount of all HAP emissions from surface coating, adhesive priming, solvent cleaning, and mold preparation activities at the facility shall be limited to 9.50 tons/year of an individual HAP and 24.0 tons/year of all HAPs combined. Compliance with this condition shall be demonstrated by compliance with Plantwide Condition 31.

30. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Plantwide Condition 25. The records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on-site, and shall be made available to Department personnel upon request.

31. 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 permittee shall maintain monthly records which demonstrate compliance with Plantwide Conditions 26, 28, and 29. The records shall be maintained in a spreadsheet, database or other well-organized format. The documents shall be updated by the fifteenth day of the month following the month to which the records

pertain. These records shall be kept on-site and shall be made available to Department personnel upon request.

SECTION V: INSIGNIFICANT ACTIVITIES

The following types of activities or emissions are deemed insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in applications dated September 9, 1999 and October 28, 2002.

Coverage under Air Permit No. 1662-AR-2 also extends (where applicable) to those significant activities and emission sources at the facility which, although not specifically listed herein, qualify as such per Appendix A of Regulation No. 18 and/or Regulation No. 19.

Description	Category
Stud reclamation oven (SN-01)	A13
Soldering and plating activities (SN−02)	B18
Manual spray paint booth (paint over-spray) (SN-04)	A13
Automatic spray paint booth (paint over-spray) (SN-16)	A13
R&D burn-off oven (SN-19)	B34
Metal fabrication operations (no SN)	A13
Assembly operations (no SN)	B18
Material handling operations (no SN)	A13
Product handling operations (no SN)	A13
Stud Etching Process (no SN)	A13
Thermoset transfer molding operations (no SN)	A13
Thermoplastic injection molding operations (no SN)	A13

SECTION VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.

2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.

3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.

4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.

5. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, records must be kept for five years which will enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

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

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

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.

8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:

   a. Sampling ports adequate for applicable test methods
   b. Safe sampling platforms
   c. Safe access to sampling platforms
   d. Utilities for sampling and testing equipment

9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met:

    a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and that all reasonable measures have been taken to immediately minimize or eliminate the excess emissions.
    b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
    c. The permittee shall submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, it need not be submitted again.

11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:

    a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit
    b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act
    c. To inspect any monitoring equipment or monitoring method required in this permit
    d. To sample any emission of pollutants
    e. To perform an operation and maintenance inspection of the permitted source

12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus.

13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.

14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.

15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.

16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.

Request for PDS Invoice	
Invoice Number *(assigned when invoice printed)*	PDS-

AFIN r	35-00304			
Name *(for confirmation only)*	Central Moloney – Components Plant			
Invoice Type (pick one) r	Initial	Mod X	Variance	
	Annual	Renewal	Interim Authority	
Permit Number r	1662-AR-2			
Media Code r	A			
Fee Code or Pmt Type r	MS			
Fee Description *(for confirmation only)*	Minor Source			
Amount Due r *(whole dollar amount only)*	$ 400.00			
Printed Comment *(600 characters maximum)*	Standard Fee Invoice Mailing Address: 5500 Jefferson Parkway Pine Bluff, AR 71602			

Note: The information below is for use by the requesting division if desired; it will not print on the invoice.	
Engineer	Amanda Holloway
Paid? (yes/no)	
Check number	
Comments	

r **Required data** *(See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)*

Request submitted by:		Date:	

Public Notice

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

The Components Division of Central Moloney, Inc. (CMI) (AFIN: 35-00304) currently operates a manufacturing facility in the city of Pine Bluff. The site, which is ordinarily referred to as the "Components Plant," is physically located at 5500 Jefferson Parkway. CMI manufactures parts for electrical distribution equipment. The facility is requesting to modify their current permit to bring CMI into full compliance with state regulations. In addition, this modification will incorporate the mold preparation process (SN-25) as an emission source, establish permit conditions that allow maximum operational flexibility by implementing HAP formulation limits based on Threshold Limit Values, increase permitted material throughput rates and emission limitations to provide for future growth, establish emission limits for HAPs that are below the "major source" thresholds, and allow the addition of three new casting-curing ovens. The plant-wide permitted annual emission rates are increasing 5.6 tons/yr for VOC and 23.8 tons/yr for Acetone while decreasing 0.24 tons/yr for combined HAPs.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact Amanda Holloway, Engineer. Both Doug Szenher and Amanda Holloway can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Watson Memorial Library, UAPB Campus, Pine Bluff, AR 71601. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Doug Szenher. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8).

Dated this

Marcus C. Devine
Director