ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation No. 26:

Permit No.: 1753-AOP-R1

Renewal #1

IS ISSUED TO:

Electrolux Home Products
DeQueen, AR 71832
Sevier County
AFIN: 67-00296

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:

April 5, 2005 AND April 4, 2010

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:	
Michael Bonds Chief, Air Division	Date Amended

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Table 1 - List of Acronyms

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

MVAC Motor Vehicle Air Conditioner

No. Number

NO_x Nitrogen Oxide

PM Particulate matter

PM₁₀ Particulate matter smaller than ten microns

SNAP Significant New Alternatives Program (SNAP)

SO₂ Sulfur dioxide

SSM Startup, Shutdown, and Malfunction Plan

Tpy Ton per year

UTM Universal Transverse Mercator

VOC Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: Electrolux Home Products

AFIN: 67-00296

PERMIT NUMBER: 1753-AOP-R1

FACILITY ADDRESS: 123 Red Bridge Road

DeQueen, AR 71852

MAILING ADDRESS Electrolux Home Products

1 Poulan Drive

Nashville, AR 71832

COUNTY: Sevier County

CONTACT POSITION: Jerry Wilcox, Environmental Coordinator

TELEPHONE NUMBER: 870-845-6817

REVIEWING ENGINEER: Melisha Griffin

UTM Zone 15

UTM North - South (Y): 3766.4

UTM East - West (X): 376.5

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Section II: INTRODUCTION

Summary of Permit Activity

Electrolux Home Products (Electrolux) operates an industrial facility located in the city of DeQueen (Sevier County), Arkansas. The physical address of the site is 123 Red Bridge Road. Electrolux manufactures a variety of electric-powered lawn and garden equipment products. These units include trimmers, edgers, chain saws, and blowers. Various gasoline-powered chain saw products are also made at the DeQueen plant. Frigidaire Home Products formerly operated the facility; the company changed its name to Electrolux in January 2002.

Pursuant to ADEQ Regulation §26.406, Electrolux is submitting a Title V permit renewal application. The facility is also adding the existing touch-up painting activities (SN-04) to the Insignificant Activities List and a new Extended-Run Engine Test Stand to SN-01. There is a slight reduction or increase in emission rates for some pollutants due to updated emission factors or changes in the methods of calculation. Other than the installation of the new Extended-Run Engine Test Stand, there are no other physical changes being requested by the facility.

Process Description

The DeQueen plant consists of several inter-connected buildings. These units are subdivided into production, warehousing, and office areas. The entire manufacturing facility encompasses approximately 155,000 square feet (including warehouse and office space).

The production processes at the Electrolux plant include the following: sub-assembly and final assembly of the lawn and garden equipment products and chain saws; performance testing of the gas-powered chain saws; hand-wipe cleaning of the finished products; and packaging of the equipment.

PRODUCT ASSEMBLY OPERATIONS

The raw materials for the production of electric-powered lawn and garden equipment products and gasoline-powered chain saws consist of various pre-manufactured metal and plastic components. Some of the metal parts are produced at another Electrolux facility. The remaining metal components are purchased from vendors. A wide variety of plastic parts are also processed at the DeQueen plant. All of these components are purchased from outside sources. (No metal or plastic parts are fabricated on-site.)

The Electrolux facility features seven production lines for the sub-assembly and final assembly of electric-powered lawn and garden equipment products. An additional three production lines are used for the manufacture of gasoline-powered chain saws. During the assembly operations, the plastic and metal components are manually put together to produce a variety of finished products. These operations are almost entirely mechanical in nature. Small quantities of lubricants, greases, oils, and similar materials are processed during production of the lawn and garden equipment and chain saws. Self-adhesive labels and decals may be applied to the products during the assembly process. General ventilation for the production lines at the

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DeQueen plant is provided by the building's heating, ventilation, and air-conditioning system. The product assembly operations are an insignificant source of air emissions.

Engine Testing Operations

After assembly, each individual gasoline-powered chain saw unit is performance tested as part of Electrolux's quality control (QC) program. The DeQueen plant is equipped with two sets of engine test booths for this purpose: (1) the "Group #1" units (multiple booths for routine testing purposes) and (2) the "Group #2" booths (six units for QC audits). During testing, the chain saws are fueled with a gasoline and oil mixture, started, and then operated for a short period of time in order to check for defects, make carburetor adjustments, etc. Once tested, the excess gasoline is removed from the chain saws using a vacuum system (i.e., "de-gassing process"). The fuel is then recycled. Gasoline is dispensed to the engine test booths from centralized "day tanks." These portable containers each hold approximately 30 gallons of fuel.

The engine test booths are equipped with exhaust hoods for venting the combustion emissions. The "Group #1" test booths are exhausted directly to the atmosphere via eight separate vents, whereas the "Group #2" booths are exhausted via five vents. No air pollution control equipment is utilized. The six QC test areas at the DeQueen plant are designated as the "208 chain brake booth," "UL test room booth," "water break area booth," "gas tear-down booth," "gasoline emissions testing booth," and the "Extended-Run Engine Test Stand." These units are operated on limited basis. The gasoline throughput and emissions at these booths have been accounted for at the main engine testing locations.)

The facility-wide emissions from the engine test booths are designated as Source Number (SN) -01. The performance testing of gasoline-powered chain saws represents the largest source of air emissions at the DeQueen plant. The emissions from the associated fueling and de-gassing operations at the test booths are also included in SN-01.

The lawn and garden equipment products are also performance tested after their assembly. However, air emissions are not generated during the test operations because these products are all electric-powered.

PRODUCT CLEANING OPERATIONS

The production activities at the DeQueen plant include hand-wipe cleaning of the chain saw products. After testing in the engine test booths, the units are wiped down with a volatile solvent in order to remove residual oil and grease. The chain saws are then allowed to air dry prior to packaging. Isopropyl alcohol is utilized as the cleaning agent. The solvent is manually applied using spray bottles and/or wiping cloths. The cleaning operations are performed at multiple locations throughout the production building. The lawn and garden equipment products may also be cleaned in a similar manner after their assembly.

The facility-wide product cleaning activities are designated as SN-03. The fugitive solvent emissions are exhausted via the plant's general ventilation system.

Packaging Operations

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After testing and cleaning, the lawn and garden equipment products and chain saws are packaged for retail distribution. The finished products are packed in cardboard boxes or are shrink-wrapped in plastic. The units are then stored in the plant warehouse pending shipment to customers. The packaging operations (no SN) are an insignificant source of air emissions.

Miscellaneous Equipment and Operations

The DeQueen plant features several miscellaneous production operations and emission sources. These items are described below:

Fuel Storage Tank: One aboveground tank is operated at the DeQueen plant. Unleaded gasoline is stored in this vessel for subsequent processing in the engine test booths. The horizontal tank has a storage capacity of 5,000 gallons.

The gasoline storage tank is designated as SN-02. The unit is vented directly to the atmosphere. No air pollution control equipment is utilized.

Touch-Up Painting Activities: Touch-up painting of the finished chain saws is occasionally performed. The units are repainted on an as-needed basis. The surface coating materials are applied using aerosol spray cans. The painted products are then allowed to air dry prior to packaging. Touch-up painting may be performed at multiple locations throughout the production building.

The touch-up painting activities are designated as SN-04. The fugitive air emissions are exhausted via the plant's general ventilation system. The painting operations are an insignificant emission source.

Silk Screening Operations: An automated silk screening machine is used to apply printed information (i.e., "logos," custom paint designs, etc.) to certain metal components (primarily chain saw bars). The printed parts are then baked in an infrared (electric) oven to cure the surface coatings. The silk-screened components are subsequently routed to the assembly lines. Various printing inks, a retarder, and a cleaning solvent are processed.

The silk screening operations are designated as SN-05. The printing machine is equipped with a vent hood. The emissions are exhausted directly to the atmosphere via a single vent. No air pollution control equipment is utilized.

The printing materials used during the silk screening operations are cleaned in a small parts washer (no SN). This unit holds between 20 and 30 gallons of "screen wash" solvent. The fugitive air emissions from the washer are exhausted via the plant's general ventilation system. (These emissions are accounted for at the silk screening operations (SN-05).)

Pad Printing Operation: This process is used to apply printed information (i.e., "logos," part numbers, etc.) to certain metal components (primarily the cutter heads for line trimmers). The parts are manually printed using a mechanical stamping unit. The

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components are then allowed to air dry. The printed parts are subsequently routed to the assembly lines. Various printing inks are processed.

The pad printing operation (no SN) is conducted on the plant floor. The fugitive air emissions are exhausted via the facility's general ventilation system. The printing operation is an insignificant emission source.

Parts Washer Unit: A small solvent cleaning machine is operated at the DeQueen plant. It is used to clean various metal components during the product assembly operations. The washer station holds between 20 and 30 gallons of solvent. Mineral spirits is used as the cleaning agent.

The fugitive air emissions from the parts washer (no SN) are exhausted via the plant's general ventilation system. The unit is an insignificant emission source.

The manufacturing operations at the Electrolux facility are a significant source of regulated air pollutants. These emissions are generated by the following: the performance testing of gasoline-powered chain saws in the engine test booths (fuel combustion emissions) [SN-01]; operation of the gasoline storage tank (emissions of volatile organic compounds (VOCs)) [SN-02]; hand-wipe cleaning of the finished chain saws (VOC emissions) [SN-03]; and, the silk screening of metal components (VOC emissions) [SN-05].

Regulations

The following table contains the regulations applicable to this permit.

Table 2 - Regulations

Source No.	Regulation Citations
Facility	Arkansas Air Pollution Control Code (Regulation #18)
Facility	Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19)
Facility	Regulations of the Arkansas Operating Air Permit Program (Title V, Regulation #26)

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The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

Table 3 - Emission Summary

EMISSION SUMMARY					
Source	D	D.H.	Emission Rates		Cross
No.	Description	Pollutant	lb/hr	tpy	Reference Page
		PM	0.8	0.4	
		PM_{10}	0.8	0.4	
Total Al	lowable Emissions	SO_2	0.7	0.4	
		VOC	165.7	107.0	
		СО	466.7	245.0	
		NO_x	12.2	6.4	
	HAPS	Acetaldehyde* Benzene* Butyl Cellosolve²* DGME³* Ethyl Benzene* Formaldehyde* MEK* Propionaldehyde* Toluene* Xylene* Hexane* MTBE*	0.11 2.23 5.60 4.25 2.23 0.44 0.50 0.11 20.95 5.39 1.79 7.11	0.06 0.50 5.04 1.07 0.50 0.28 0.13 0.06 9.19 0.47 0.40 1.58	
01	Engine Test Booths	PM PM ₁₀ SO ₂ VOC CO NO _X Acetaldehyde Benzene Ethyl Benzene Formaldehyde	0.8 0.8 0.7 16.8 466.7 12.2 0.11 0.85 0.85 0.32	0.4 0.4 0.4 8.9 245.0 6.4 0.06 0.45 0.45 0.17	13

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EMISSION SUMMARY					
Source	Description	Pollutant	Emission Rates		Cross
No.	Description	Pollutant	lb/hr	tpy	Reference Page
		Hexane MTBE Propionaldehyde Toluene Xylene	0.68 2.69 0.11 5.89 2.52	0.36 1.42 0.06 3.10 1.33	
02	Gasoline Storage Tank	VOC Benzene Ethyl Benzene Hexane MTBE Toluene Xylene	27.6 1.38 1.38 1.11 4.42 9.66 4.14	1.0 0.05 0.05 0.04 0.16 0.34 0.15	16
03	Product Cleaning Operations	VOC	97.5	78.8	18
05	Silk Screening Operations	VOC Butyl Cellosolve DGME Formaldehyde Toluene	18.8 5.60 4.25 0.12 4.40	17.0 5.04 1.07 0.11 5.50	20

^{1.} Non-VOC, non-HAP

Also known as Ethylene Glycol Monobutyl Ether
 Diethylene Glycol Monobutyl Ether

^{*}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.

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Section III: PERMIT HISTORY

Permit #1753-A was issued to Frigidaire Home Products - DeQueen Plant on October 31, 1997. This permit allowed the facility to manufacture and test gasoline powered chain saws. Prior to the issuance of this permit, the facility did not require an air permit due to potential emissions below 10 tpy of any criteria pollutant.

Permit #1753-AR-1 was issued to Frigidaire Home Products - DeQueen Plant on September 15, 1998. This permit covered installation of the silk screening operations (SN-05). Permitted emissions of VOCs and HAPs increased with the issuance of this permit.

Permit #1753-AOP-R0 was the first operating permit issued to Frigidaire Home Products - DeQueen Plant under Regulation 26. Previously, this facility was operating under a minor source permit due to permitted emissions below the major source thresholds. With this permit, the facility increased productions and therefore increased permitted emissions over the major source thresholds. The facility is now considered a major source for Title V purposes due to permitted carbon monoxide emissions in excess of 100 tons per year.

The name listed on Permit #1753-AOP-R0 was changed from Frigidaire Home Products to Electrolux Home Products on September 8, 2004.

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Section IV: SPECIFIC CONDITIONS

SN- 01

Engine Test Booths

(Facility-Wide Emissions)

Process Description

Electrolux manufactures a variety of gasoline-fired chain saws at the DeQueen plant. Small two-cycle internal combustion engines are used to power these units. After assembly, each chain saw is performance tested as part of the company's quality control (QC) program. The DeQueen plant is equipped with two sets of engine test booths for this purpose: (1) the "Group #1" units (multiple booths for routine testing purposes) and (2) the "Group #2" booths (six units for QC audits). During testing, the chain saws are fueled with a gasoline and oil mixture, started, and then operated for a short period of time in order to check for defects, make carburetor adjustments, etc. Once tested, the excess gasoline is removed from the chain saw units using a vacuum system (i.e., "de-gassing process"). The fuel is then recycled.

The engine test booths are equipped with exhaust hoods for venting the combustion emissions. The "Group #1" test booths are exhausted directly to the atmosphere via eight separate vents, whereas the "Group #2" booths are exhausted via five vents. No air pollution control equipment is utilized. (The six QC test areas at the DeQueen plant are designated as the "208 chain brake booth," "UL test room booth," "water break area booth," "gas tear-down booth," "gasoline emissions testing booth," and the "Extended-Run Engine Test Stand." These units are operated on limited basis. The gasoline throughput and emissions at these booths have been accounted for at the main engine testing locations.)

The facility-wide emissions from the engine test booths are designated as Source Number (SN) -01. The emissions from the associated fueling and de-gassing operations at the test booths are also included in this source.

SN-01 also includes emissions from the new Extended-Run Engine Test Stand. During testing, chain saws and other products are mounted on the test stand, started, and then allowed to run continuously for extended periods of time (i.e., several hours to several days). This allows Electrolux to evaluate the performance and durability of its products.

The combustion emissions were estimated on a facility-wide basis using an "emissions bubble" approach. EPA emission factors were utilized. The HAP emissions from the testing activities were quantified on a mass balance basis using formulation data for the fuels processed on-site.

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Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Plantwide Conditions 7 and 8. [Regulation No. 19, §19.501 *et seq.*, effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 4 - Maximum Criteria Emission Rates

Pollutant	lb/hr	Тру
PM_{10}	0.8	0.4
SO_2	0.7	0.4
VOC	16.8	8.9
CO	466.7	245.0
NO_X	12.2	6.4

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Plantwide Conditions 7 and 8. [Regulation No. 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 5 - Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	Тру
PM	0.8	0.4
Acetaldehyde	0.11	0.06
Benzene	0.85	0.45
Ethyl Benzene	0.85	0.45
Formaldehyde	0.32	0.17
Hexane	0.68	0.36
MTBE	2.69	1.42
Propionaldehyde	0.11	0.06
Toluene	5.89	3.10
Xylene (Mixed Isomers)	2.52	1.33

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3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

Table 6 - Visible Emissions

SN	Limit	Regulatory Citation
01	5 %	18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311

- 4. The permittee will conduct weekly observations of the opacity from SN-01 and keep a record of these observations. If the permittee detects visible emissions, then the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep the records on-site and make the records available to Department personnel upon request. [Regulation No. §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 5. The permittee shall combust only unleaded gasoline at the test booths. [Regulation No. §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SN-02

Gasoline Storage Tank

Process Description

Electrolux operates one aboveground tank at the DeQueen plant. Unleaded gasoline is stored in this vessel for subsequent use in the engine test booths. The tank is a horizontal unit with a capacity of 5,000 gallons.

The gasoline storage tank is designated as SN-02. The unit is vented directly to the atmosphere. No air pollution control equipment is utilized.

The VOC emissions from the gasoline storage tank were estimated using the EPA's "TANKS4" computer program. The HAP emissions from this equipment were quantified on a mass balance basis using formulation data for the fuels processed on-site.

Specific Conditions

6. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Plantwide Conditions 7 and 8. [Regulation No. 19, §19.501 *et seq.*, effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 7 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	27.6	1.0

7. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Plantwide Conditions 7 and 8. [Regulation No. 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 8 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
Benzene	1.38	0.05
Ethyl Benzene	1.38	0.05
Hexane	1.11	0.04
MTBE	4.42	0.16
Toluene	9.66	0.34
Xylene	4.14	0.15

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8. The permittee shall store only unleaded gasoline at SN-02. [Regulation No. §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SN-03

Product Cleaning Operations

Process Description

The production activities at the DeQueen plant include hand-wipe cleaning of the finished chain saw products. After testing in the engine test booths, the units are wiped down with a volatile solvent in order to remove residual oil and grease. The chain saws are then allowed to air-dry prior to packaging. Isopropyl alcohol is currently used as the cleaning agent. The solvent is manually applied using spray bottles and/or wiping cloths. The cleaning operations are performed at multiple locations throughout the production building. (A small amount of isopropyl alcohol is also used for cleaning the finished lawn and garden equipment products.)

The plant-wide emissions from the product cleaning operations are designated as SN-03. The fugitive solvent emissions are exhausted via the facility's general ventilation system.

The VOC emissions from the product cleaning operations were quantified using a mass balance approach. Maximum process throughput rates and MSDS information for isopropyl alcohol were utilized. The fugitive solvent emissions were estimated on a facility-wide basis (i.e., "emissions bubble").

Specific Conditions

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Specific Conditions 10 and 11. [Regulation No. 19, §19.501 *et seq.*, effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 9 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	97.5	78.8

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10. The permittee shall not use in excess of 21,000 gallons of isopropyl alcohol at SN-03 in any consecutive twelve-month period. [Regulation No. §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

11. The permittee shall maintain records of the isopropyl alcohol usage at SN-03 in order to demonstrate compliance with Specific Condition 10 and which may be used by the Department for enforcement purposes. 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. These reports shall also be submitted to the Department per General Provision. [Regulation No. §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]

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SN-05

Silk Screening Operations

Process Description

An automated silk screening machine is used to apply printed information (i.e., "logos," custom paint designs, etc.) to certain metal components (primarily chain saw bars). The printed parts are then baked in an infrared (electric) oven to cure the surface coating. The silk-screened components are subsequently routed to the assembly lines. Various printing inks, a retarder, and a cleaning solvent are processed.

The silk screening operations are designated as SN-05. The printing machine is equipped with a vent hood. The emissions are exhausted directly to the atmosphere via a single vent. No air pollution control equipment is utilized.

The printing materials used during the silk screening operations are cleaned in a small parts washer (no SN). This unit holds between 20 and 30 gallons of "screen wash" solvent. The fugitive air emissions from the washer are exhausted via the plant's general ventilation system. (These emissions are accounted for at the silk screening operations (SN-05).)

The VOC and HAP emissions from the silk screening operations were quantified using a mass balance approach. Maximum process throughput rates and worst-case formulation values for the printing chemicals were utilized.

Specific Conditions

12. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Specific Conditions 14, 17, and 18. [Regulation No. 19, §19.501 *et seq.*, effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 10 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
VOC	18.8	17.0

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13. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Specific Conditions 15, 17, and 18. [Regulation No. 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 11 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
DGME	4.25	1.07
Formaldehyde	0.12	0.11
Toluene	4.40	5.50

14. The permittee shall not exceed the following VOC contents for the designated material at SN-05. [Regulation No. 19, §19.705, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 12 – Maximum VOC Content Limits

Material	VOC Content, lb/gal
Inks	6.5
Retarders	8.5
Solvents	8.0

15. The permittee shall not exceed the following HAP contents for the designated materials at SN-05. [Regulation No. 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 13– Maximum HAP Content Limits

Material	НАР	HAP Content, % by weight	
Inks	Formaldehyde	1	
Retarders	DGME	100	
Solvents	Toluene	55	

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16. The permittee shall maintain the appropriate MSDS in order to demonstrate compliance with Specific Conditions 14 and 15 and which may be used by the Department for enforcement purposes. The MSDS shall be kept on-site and made available to Department personnel upon request. [Regulation No. 19, §19.705, 40 CFR Part 52, Subpart E, §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

17. The permittee shall not exceed the following usage rates for the designated materials. [Regulation No. 19, §19.705, 40 CFR 70.6, and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and §18.1004 of Regulation 18]

Table 14– Maximum Material Throughput Limits

Material	Gallons per consecutive 12 months
Inks	1,800
Retarder	250
Solvent	2,500

18. The permittee shall maintain records of the type and amount of each material used in order to demonstrate compliance with Specific Condition 17 and which may be used by the Department for enforcement purposes. 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. These reports shall also be submitted to the Department per General Provision 7. [Regulation No. 19, §19.705, 40 CFR Part 52, Subpart E or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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Section V: COMPLIANCE PLAN AND SCHEDULE

Electrolux Home Products 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: PLANT WIDE CONDITIONS

- 1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No. 19, §19.410(B) and 40 CFR Part 52, Subpart E]
- 3. The permittee must 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) New Equipment or newly 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) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No. 19, §19.702 and/or Regulation No.18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 4. The permittee must provide: [Regulation No. 19, §19.702 and/or Regulation No.18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §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.
- 5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No. 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 7. Throughput of unleaded gasoline at this facility (SN-01 and SN-02) shall not exceed 63,000 gallons in any consecutive twelve-month period. [Regulation No. §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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8. The permittee shall maintain records of the unleaded gasoline throughput at this facility in order to demonstrate compliance with Plantwide Condition 7 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the fifteenth day of the month following the month which the records represent, shall be kept onsite, and shall be made available to Department personnel upon request. These reports shall also be submitted to the Department per General Provision 7. [Regulation No. §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Title VI Provisions

- 9. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
 - a. 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.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 10. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. 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.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. 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.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.

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f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

- 11. 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.
- 12. 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.
- 13. The permittee can switch from any ozone-depleting substance to any alternative 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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Permit Shield

14. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in Table 15 - Applicable Regulations of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated 06/30/2004.

Table 15- Applicable Regulations

Source No.	Regulation	Description
Facility	Regulation #19	Regulations of the Arkansas Plan of Implementation for Air Pollution Control
Facility	Regulation #26	Regulations of the Arkansas Operating Air Permit Program (Title V)

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated 06/30/2004.

Table 16 - Inapplicable Regulations

Source No.	Regulation	Description
02	40CFR60 Subpart Ka	Standard of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (This regulation does not apply to SN-02 because of a storage capacity below applicability limits.)
02	40CFR60 Subpart Kb	Subpart Ka—Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 (This regulation does not apply to SN-02 because of a storage capacity below applicability limits.)

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Section VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or is listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated June 30, 2004.

Table 17- Insignificant Activities

Description	Category
The sub-assembly and final assembly of chain saws and lawn and garden equipment products, the use of small quantities of lubricants, oils, greases, etc. during these operations, and the application of labels and decals during the assembly process	Group A, #13
The receiving, storage, and/or handling or premanufactured metal and plastic components used for the production of lawn and garden equipment and chain saws.	Group A, #13
The packaging, storage, and/or loading of the finished	G
chain saws and lawn and garden equipment products.	Group A, #13
Operation of the "day tanks" for gasoline storage at the engine test booths (SN-01), their associated fuel transfer systems, and the dispensing of fuel into the day tanks from the bulk storage tank (SN-02).	Group A, #13
Operation of the small parts washer units, and the associated storage and handling of mineral spirits.	Group A, #13
The pad printing operation and the associated inks	
used with this process.	Group A, #13
The touch-up painting activities (SN-04)	Group A, #13
Extended-Run Engine Test Stand	Group A, #13

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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Section VIII: GENERAL PROVISIONS

- 1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 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. [40 CFR 70.6(b)(2)]
- 2. 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. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]
- 3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will 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. [Regulation No. 26, §26.406]
- 4. 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, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26, §26.701(A)(2)]
- 5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26, §26.701(C)(2)]
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

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6. The permittee must retain the records of all required monitoring data and support information for at least five (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. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26, §26.701(C)(2)(b)]

- 7. The permittee must submit reports of all required monitoring every six (6) months. If the permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]
- 8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation §19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location,
 - ii. The process unit or emission source deviating from the permit limit,
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs,
 - iv. The date and time the deviation started,
 - v. The duration of the deviation.
 - vi. The average emissions during the deviation,
 - vii. The probable cause of such deviations,
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - ix. The name of the person submitting the report.

The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were

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exceeded and to reduce the length of time the limits were exceeded. The permittee 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 the report will serve as both the initial report and full report.

- b. For all deviations, the permittee will report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a. above. The semi-annual report must include all the information as required in the initial and full report required in 8a. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26, §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]
- 9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will 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. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]
- 10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 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, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26, §26.701(F)(1)]
- 11. 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 to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26, §26.701(F)(2)]
- 12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26, §26.701(F)(3)]
- 13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26, §26.701(F)(4)]
- 14. The permittee must 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 must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26, §26.701(F)(5)]

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15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 26, §26.701(G)]

- 16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26, §26.701(H)]
- 17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26, §26.701(I)(1)]
- 18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26, §26.702(A) and (B)]
- 19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26, §26.703(A)]
- 20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26, §26.703(B)]
 - a. 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;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
- 21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26, §26.703(E)(3)]

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- a. The identification of each term or condition of the permit that is the basis of the certification;
- b. The compliance status;
- c. Whether compliance was continuous or intermittent;
- d. 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
- e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
- 22. Nothing in this permit will alter or affect the following: [Regulation No. 26, §26.704(C)]
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
- 23. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

AFIN: «CSN»

APPENDIX A

AFIN: «CSN»

APPENDIX B

AFIN: «CSN»

APPENDIX C

AFIN: «CSN»

APPENDIX D

Request for PDS Invoice				
Invoice Number (assigned	PDS-			
when invoice printed)				
AFIN *	«CSN»			
Name	«Facility»			
(for confirmation only)				
Invoice Type (pick one) *	Initial Mod Variance			
	Annual	Renewal X	Interim	
			Authority	
Permit Number *	1753-AOP-R1«PERMIT_NUMBER»			
Media Code *	A			
Fee Code or Pmt Type *	T5			
Fee Description	Title V			
(for confirmation only)				
Amount Due * (whole dollar amount only)	\$0.00			
Printed Comment(600				
characters maximum)				
Note: The information below is for use by the requesting division if desired; it will not print on the invoice.				
Engineer	Melisha Griffin«Engineer»			
Paid? (yes/no)				
Check number				
Comments				
Required data (See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)				
Request submitted by:			Date:	

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation No. 26) Section 602, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Electrolux Home Products (Electrolux) operates an industrial facility located in the city of DeQueen (Sevier County), Arkansas. The physical address of the site is 123 Red Bridge Road. Electrolux manufactures a variety of electric-powered lawn and garden equipment products. Pursuant to ADEQ Regulation §26.406, Electrolux Home Products submitted a Title V permit renewal application.

The staff of the Department reviewed the application, and the application 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 Melisha Griffin«Engineer», Engineer. Citizens can reach both Doug Szenher and Melisha Griffin«Engineer» 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. «Local_Library», «Libr_Addr», «Libr_City», «Libr_State» «Libr_Zip» has a copy of the draft permit. Citizens may review this information 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. For the Department to consider the comment, the interested or affected persons must submit written comments within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, the Department will schedule and hold a hearing if the Department receives significant comments on the permit provisions. If the Department schedules a hearing, the Department will give adequate public notice in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director will 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 No. 8) and Regulation No. 26.

Dated this

Marcus C. Devine Director