

ADEQ
DRAFT
MINOR SOURCE
AIR PERMIT

Permit No. : 0928-AR-3

IS ISSUED TO:

CMC Steel Arkansas
100 Columbia, 7B
Magnolia, AR 71753
Columbia County
AFIN: 14-00145

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

Signed:

Mike Bates
Chief, Air Division

Date

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List of Acronyms and Abbreviations

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

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Section I: FACILITY INFORMATION

PERMITTEE: CMC Steel Arkansas

AFIN: 14-00145

PERMIT NUMBER: 0928-AR-3

FACILITY ADDRESS: 100 Columbia, 7B
Magnolia, AR 71753

MAILING ADDRESS: 100 Columbia 7B
Magnolia, AR 71753

COUNTY: Columbia County

CONTACT NAME: Stephen Weaver

CONTACT POSITION: General Manager

TELEPHONE NUMBER: 870-234-8703

REVIEWING ENGINEER: Melisha Griffin

UTM North South (Y): Zone 15: 3674201.48 m

UTM East West (X): Zone 15: 479054.74 m

Section II: INTRODUCTION

Summary of Permit Activity

The purpose of this modification is to change the status of the facility from a Title V major source to a synthetic minor source. The permit is being modified to establish minor source enforceable limits and will retain the annual cap for HAP emissions at 9.5 tpy for any single HAP and 23.75 tpy for total HAPs. The permitted VOC reduced by 126.8 tpy to 90.3 tpy.

Process Description

CMC operates a facility in Magnolia, Arkansas which manufactures steel reinforcing bars, small angles, round bars, corner post and metal fence post. The steel products are produced by recycling used railroad rails and billets.

The incoming rail and billet shipments are received by railcar and truck in various weight grades. The materials are off-loaded and prepared for delivery to the reheat furnace (SN-03). This furnace is rated at 68 MMBTU/hr. In the reheat furnace, the rail is heated to approximately 2,200 degrees Fahrenheit (°F). As the rail exits the furnace, it is slit into two (2) parts. These parts are delivered by conveyor to a series of millstands (rolling mill). As the steel passes through these stands it is reduced in size and formed into a product. This process is commonly referred to as being rerolled. From the rolling mill, the steel travels by conveyor to a cooling bed. After the steel has cooled, it travels by conveyor to a cold shear. At the shear, the various products are cut to length and bundled for delivery.

Fence post sections are processed in 4 to 14 foot lengths. The posts are the type used in barbed wire fences. The stock material is stored on-site in the post shop building or in its adjacent yard. The posts are placed on a conveyor where an anchor flange is pressed onto the post. The posts are transferred to a second conveyor to be dip coated. Some posts are sold without anchor flanges. Examples would include silt fence posts or grape stakes.

Posts ranging from 4 to 8 feet in length are dipped into water-based paint and dried in a natural gas fired drying oven. After exiting the primary paint line oven, the post tips are dip coated in a shallow tank. The posts are heated in a second natural gas fired drying oven to dry the tips. The posts are then removed from the conveyor, banded in groups and stored for shipment. The heat input of the primary oven (SN-02) is 3.0 MMBTU/hr. The heat input of the sign post oven (renamed the "long post" oven) is 1.0 MMBTU/hr (SN-04).

Long fence posts are also processed in lengths ranging from 10 feet to 14 feet on the former "sign post" line, separate from the primary system. The stock material is stored on-site in the adjacent building or yard. They are dipped in a water-based paint and then dried in a natural gas fired drying oven (SN-04). This oven was previously and incorrectly rated at 5.0 MMBTU/hr. The oven is actually rated at 1.0 MMBTU/hr. This oven is used as a tip drying oven for all

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posts, as well as for drying painted posts in 10 feet to 14 feet lengths. The posts are removed from the oven and banded in groups. They are then stored until shipped to customers.

Additionally, rebar is sheared into 4 foot lengths and taken to a staging area where an anchor plate will be applied and tack welded on. Once this is done, the rebar post will be hung on a rack and the rack will then be dipped into a dip tank (SN-05). The dip tank will be approximately 4' in diameter and 5' to 6' deep. After dipping, the rack will remain over the tank to recover any run off. When the posts quit dripping, they are manually pushed to a staging area to allow the posts to air dry.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009

Total Allowable Emissions

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	0.8	2.5
PM ₁₀	0.8	2.5
SO ₂	0.3	0.4
VOC	52.8	90.3
CO	6.2	26.7
NO _x	7.2	31.7
Single HAP	20.9	9.5
Total HAPs	20.9	23.75*

*HAPs included in the VOC totals.

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Section III: PERMIT HISTORY

Permit 928-A was issued to CMC Steel Fabricators, Inc. d/b/a SMI Steel - Arkansas, Southern Post Division on March 15, 1989 for an existing facility. The facility was constructed in 1987. The initial permit had a permit limit of 247.2 tpy VOC from the painting operation using solvent based paints, but required that the paints used be changed to water based paints. The completion of this change was required by November 1, 1989 at which time the permit limit for VOC would be reduced to 70 tpy.

Permit 928-AR-1 was issued to SMI Steel - Arkansas on October 23, 1992. This permit had only one active source (SN-02) which was post painting and drying. The thinner storage tank (SN-01) was listed as being disconnected from service. Permit limits were 0.26 tpy of PM, 4.71 tpy of VOC, 7.36 tpy of NO_x, 1.84 tpy of CO, and 0.04 tpy of SO₂.

Permit 928-AOP-R0 was the first operating permit issued to SMI Steel - Arkansas under Regulation 26. No physical modifications occurred with the issuance of this permit. Emissions from the products of combustion and HAP from painting are listed for the first time in this permit. The increase usage of painting materials increases the VOC limits from 84.71 tpy in the previous permit to 220.5 tpy in this permit.

Permit 928-AOP-R1 was issued on January 27, 2003 in order to limit HAP emissions below major source status. No physical or other emissions modifications occurred with the issuance of this permit. The production of sign posts ceased in 2002. The sign post oven is now used for drying for drying long posts and tips of all posts.

Permit 928-AOP-R2 was issued on January 18, 2005. This was the initial Title V permit renewal for this facility. There were no process changes made at this time. Emissions rates were revised to reflect updated emission factors and paint removal from the hooks on the hanging conveyor line were added as an insignificant activity.

Permit 928-AOP-R3 was issued on December 04, 2009. In this modification, the facility added a new process line to manufacture E-posts (SN-05). The resulting change in emissions was an increase of 0.4 tpy of VOC. In 2005, one of the two drying ovens used at SN-02 was removed, leaving only the primary oven.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table. Combustion emissions are based on the maximum capacity of the equipment. [Regulation 19, §19.501 et seq., and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
02	Fence Post Painting and Primary Oven (3 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		CO	0.3	1.2
		NO _x	0.3	1.4
		VOC	40.9	88.2*
03	Reheat Furnace (68.0 MMBtu/hr)	PM ₁₀	0.6	2.3
		SO ₂	0.1	0.2
		CO	5.8	25.1
		NO _x	6.8	29.8
		VOC	0.4	1.7
04	Long Post and Tip Painting and Oven (1.0 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		CO	0.1	0.4
		NO _x	0.1	0.5
		VOC	11.3	88.2*
05	E-Post Painting	VOC	0.2	0.4

*Annual VOC emissions for SN-02 and SN-04 are bubbled to include a combined total of 88.0 tpy of VOCs from coatings plus 0.1 tpy of VOCs from natural gas burning at each source.

- The permittee shall not exceed the emission rates set forth in the following table. Combustion emissions are based on the maximum capacity of the equipment. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
02	Fence Post Painting and Primary Oven (3 MMBtu/hr)	PM	0.1	0.1
		HAP	16.4	**
03	Reheat Furnace (68.0 MMBtu/hr)	PM	0.6	2.3
04	Long Post and Tip Painting and Oven (1.0 MMBtu/hr)	PM	0.1	0.1
		HAP	4.5	**

**Annual HAP emissions are bubbled at 9.5 tpy of any Single HAP and 24.5 tpy of combined HAPs.

- Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this limit shall be demonstrated by compliance with Specific Condition 4. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
02	5%	§18.501
03	5%	§18.501
04	5%	§18.501

- The permittee shall use only natural gas as fuel at SN-02, SN-03 and SN-04. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 70.6]
- The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §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. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- The permittee shall not exceed the painting and/or coating usage limits stated in the table below. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	VOC Content (Maximum lb/gal)	HAP Content (Maximum lb/gal)	HAP TLV (Minimum mg/m ³)
02	Fence Post Painting and Two Ovens (3 MMBtu/hr - combined)	1.0	0.4	16.7
04	Sign Post Painting and an Oven (1.0 MMBtu/hr)	1.0	0.4	16.7
05	E-Post Painting	0.63	No HAPs Allowed	N/A

- The permittee shall calculate and maintain monthly records of VOC emissions from the fence post painting (SN-02), and sign post painting (SN-04), and E-Post Painting (SN-05) in a spreadsheet, data base or other well organized format. 100 % of the VOCs listed in

the purchase records and MSDS sheets will be considered to be emitted from the facility. These records shall be updated monthly. The records, along with supporting purchase records and MSDS sheets for all materials, shall be kept on site and made available to Department personnel upon request. The monthly VOC records shall include a monthly emission total, as well as a twelve-month rolling total (the sum of the current month's emission totals combined with the previous eleven). The 12-month rolling total shall be the basis for compliance with annual permitted limits. These records shall be reported in accordance with General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

9. The permittee shall calculate and maintain monthly records of HAP emissions from the fence post painting (SN-02) and sign post painting (SN-04) in a spreadsheet, data base or other well organized format. 100 % of the HAPs listed in the purchase records and MSDS sheets will be considered to be emitted from the facility. These records shall be updated monthly. The records, along with supporting purchase records and MSDS sheets for all materials applied, shall be kept on site and made available to Department personnel upon request. The monthly HAP records shall include a monthly emission total, as well as a twelve-month rolling total (the sum of the current month's emission totals combined with the previous eleven) of each individual HAP and all HAPs combined. The 12-month rolling total shall be the basis for compliance with annual permitted limits. These records shall be reported in accordance with General Provision 7. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. The paints and/or coatings used at this facility shall not contain any HAP with a TLV less than 16.7 milligrams per cubic meter (mg/m^3). Compliance shall be demonstrated by the record keeping requirements of Specific Condition 9. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
11. The permittee shall not use any HAP containing material at SN-05. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
12. Only water may be used as a thinner for the paints used in the dip tanks in the fence post painting (SN-02) and sign post painting process (SN-04). [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 70.6]

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated July 16, 2009.

Description	Category
Paint removal from hooks (two 0.5 MMBtu/hr burners)	A - 1

Section VI: GENERAL CONDITIONS

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

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

5301 Northshore Drive
North Little Rock, AR 72118-5317

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

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

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

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

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

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

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

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

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