

# ADEQ DRAFT OPERATING AIR PERMIT

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

Permit No. : 1440-AOP-R4

IS ISSUED TO:

Arkansas Glass Container Corporation  
516 West Johnson  
Jonesboro, AR 72403  
Craighead County  
AFIN: 16-00061

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:

August 19, 2008 AND August 18, 2013

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Mike Bates  
Chief, Air Division

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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
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO <sub>2</sub>	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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**SECTION I: FACILITY INFORMATION**

PERMITTEE: Arkansas Glass Container Corporation

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PERMIT NUMBER: 1440-AOP-R4

FACILITY ADDRESS: 516 West Johnson  
Jonesboro, AR 72403

MAILING ADDRESS: 516 West Johnson  
Jonesboro, AR 72403

COUNTY: Craighead County

CONTACT NAME: Joel Sharp

CONTACT POSITION: Chief Operating Officer

TELEPHONE NUMBER: 870-932-4564

REVIEWING ENGINEER: Andrea Sandage

UTM North South (Y): Zone 15: 3969279.27 m

UTM East West (X): Zone 15: 707057.04 m

## **SECTION II: INTRODUCTION**

### **Summary of Permit Activity**

Arkansas Glass Container Corporation owns and operates a glass container manufacturing facility in Jonesboro, Arkansas (Craighead County). The facility first began operation in 1949 as the McSwain Glass Company. Current ownership was established in January of 1986.

This Title 5 minor modification to Permit #1440-AOP-R3 is being issued to allow the facility to install a new small surface coating operation, (SN-10), and a new drying oven, 1 MMBTU/hr (to be added under SN-05). The total permitted emission increase is 8.7 tons per year (tpy) of VOC as a result of the booth itself. Emissions from the drying oven are 0.1 tpy PM/PM<sub>10</sub>, 0.1 tpy SO<sub>2</sub>, 0.1 tpy VOC, 0.4 tpy CO, and 0.5 tpy NO<sub>x</sub>. There will be no permitted emission increase from the oven because of bubbled combustion sources under SN-05.

### **Process Description**

The raw materials used for making glass are stored in silos. Particulate emissions from the feldspar/nephelene silo (SN-04A), the soda ash silo (SN-04B), and the cullet silo (SN-04C) are controlled with fabric socks on top of the silos. Particulate emissions from the sand silo (SN-04D) and the limestone silo (SN-04E) are controlled with baghouses. The discharges from the silos are controlled with a baghouse (SN-04F). The railcar unloading operation is also controlled with a baghouse (SN-08).

The raw materials are mixed and conveyed to one of two glass melting furnaces (SN-01 and SN-03), where molten glass is produced. Natural gas burners provide the energy needed to melt the raw materials. Electrical boost systems help equalize the temperature in the flow of liquid glass in order to improve the quality of the finished glass. The electrical boost system is essentially a series of heating coils placed in the flow of liquid glass. No emissions are associated with the electrical boost systems.

The molten glass is carried through distribution channels (alcoves) to the forehearths. Natural gas-fired burners inside the alcoves provide heat to keep the glass molten. The molten glass is then shaped into containers in the forming machines (SN-09). VOC emissions from the forming machines occur due to the flash vaporization of the lubricant used on the molds. The still hot formed containers proceed to the annealing lehrs for controlled cooling. The annealing lehrs are also heated with natural gas burners. All of the natural gas combustion sources associated with the alcoves, forehearths, and annealing lehrs, the heated caustic tanks, and the oil/water separator dehydrators are grouped together as SN-05.

The finished glass is then inspected, packaged, and shipped to customers. Defective glass containers are returned to the furnaces for re-melting.

### Regulations

The *Standards of Performance for Glass Manufacturing Plants* (40 CFR Part 60, Subpart CC) are not applicable to the glass melting furnaces at this facility. The work performed on these sources since the applicability date of the standards (June 15, 1979) is exempt from the requirements, because re-bricking of furnace structures is expressly excluded from the regulation's definition of reconstruction (60.292(c)).

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
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective January 25, 2009

### Emission Summary

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

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	30.6	109.6
		PM <sub>10</sub>	30.6	109.6
		SO <sub>2</sub>	17.5	63.3
		VOC	31.1	102.7
		CO	10.0	39.5
		NO <sub>x</sub>	104.9	387.9
SN-03 (03A, 03B, 03C)	Glass Melting Furnace "A"	PM	14.6	106.9
		PM <sub>10</sub>	14.6	106.9
		SO <sub>2</sub>	8.7	63.3
		VOC	5.9	42.8
		CO	2.9	21.4
		NO <sub>x</sub>	50.0	366.4
SN-02	Source Removed			
SN-03 (03A, 03B, 03C)	Glass Melting Furnace "C"	PM	14.6	*Emission Bubbled with SN- 01
		PM <sub>10</sub>	14.6	
		SO <sub>2</sub>	8.7	
		VOC	5.9	

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		CO	2.9	
		NO <sub>x</sub>	50.0	
SN-4A	Feldspar/Nephaline Storage Silo with Fabric Sock	PM	0.2	0.1
		PM <sub>10</sub>	0.2	0.1
SN-04B	Soda Ash Storage Silo with Fabric Sock	PM	0.2	0.1
		PM <sub>10</sub>	0.2	0.1
SN-04C	Cullet Silo with Fabric Sock	PM	0.2	0.2
		PM <sub>10</sub>	0.2	0.2
SN-04D	Sand Silo with Baghouse	PM	0.1	0.2
		PM <sub>10</sub>	0.1	0.2
SN-04E	Limestone Silo with Baghouse	PM	0.1	0.1
		PM <sub>10</sub>	0.1	0.1
SN-04F	Storage Silos Discharge with Baghouse	PM	0.1	0.2
		PM <sub>10</sub>	0.1	0.2
SN-05	Miscellaneous Natural Gas Combustion Sources	PM	0.4	1.7
		PM <sub>10</sub>	0.4	1.7
		SO <sub>2</sub>	0.1	0.2
		VOC	0.3	1.2
		CO	4.2	18.1
		NO <sub>x</sub>	4.9	21.5
SN-08	Railcar Unloading Baghouse	PM	0.1	0.1
		PM <sub>10</sub>	0.1	0.1
SN-09	Forming Machines	VOC	15.0	50.0
SN-10	Surface Coating Operations	VOC	4.0	8.7
SN-06A	Refractory Shaker Screen (fugitive)	Moved to Insignificant Activity List		
SN-06B	Cullet Hammer Mill	Removed from service		
SN-07A	Gasoline Storage Tank (fugitive)	Moved to Insignificant Activity List		
SN-07B	Diesel Storage Tank (fugitive)	Moved to Insignificant Activity List.		
SN-07C	Kerosene Storage Tank (fugitive)	Removed from service.		

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

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

Air Permit 1440-A was issued to Arkansas Glass Container Corporation on February 26, 1993. This was the first air permit issued to the facility. Permitted sources included three glass melting furnaces (SN-01, SN-02, and SN-03) and a fabric dust collection system (SN-04). Due to permitted nitrogen oxides emissions of 615.8 tons per year, Air Permit 1440-A classified the facility as a major source under the regulations of 40 CFR Part 52.21 (Prevention of Significant Deterioration).

Air Permit 1440-AOP-R0 was issued on June 25, 1998. This permit was issued in order to fulfill the requirements of Arkansas Regulation 26 and Title V of the Clean Air Act. This permitting action identified and quantified pre-existing emission sources not covered by the previous permit, authorized an annual production increase of 5200 tons of glass per year, acknowledged the removal of the middle glass furnace (SN-02), and recognized the identification of a higher daily production capacity for the two remaining glass furnaces (SN-01 and SN-03).

Air Permit 1440-AOP-R1 was modified and issued on August 22, 2001. The modification included the following:

- Identify existing emission points previously omitted from the air permit.
- Update emission calculation methods for baghouse-controlled sources and the forming machines.
- Update the insignificant activities list.
- Acknowledge the addition of electric boost systems in the glass melting furnaces (previously approved by the Department in October 1999)
- Incorporate a slightly higher VOC limit for the glass furnaces, due to stack testing conducted in July 1999 (this increase was not due to any modification of the furnaces).

Air permit 1440-AOP-R2 was issued on August 29, 2003 as a renewal for a Title V operating permit # 1440-AOP-R1. No new construction or major modification was proposed. Also on January 2, 2003 the Division issued a letter of acceptance for a Title V Minor Modification allowing Arkansas Glass Container Corp to modify several miscellaneous pieces of natural gas fired equipment, designated as emission source SN-05, during a planned shutdown. These miscellaneous items of equipment are located and operated through the plant to facilitate the required heating of molten glass and other materials. Some equipment was refurbished, some equipment was removed, and two new pieces (mil ovens) of equipment were added. This modification resulted in a decrease in the total firing rate, by 1,654,000 Btu/ hr, of the equipment designated as SN-05.

Air Permit 1440-AOP-R3 was issued on August 19, 2008 as a renewal for a Title V operating permit # 1440-AOP-R2. No new construction or major modification was proposed. The permitted tpy of CO increased 26.9 tpy after the emission rate was adjusted for SN-01 from 0.2 lb/ ton glass to 0.5 lb/ton glass. The estimated efficiency of the passive fabric filters was

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adjusted from 90% to a more reasonable 99% for sources SN-04A, 04B, and 04C. The permitted NOx emission rates for SN-01 and SN-03 were excessively high when compared to actual stack data and adjusted accordingly. The total permitted emissions for NOx decreased from 655.5 tpy to 387.9 tpy and the permitted emissions for PM/PM10 decreased from 35.4 to 30.6 tpy. The testing requirements for Specific Condition 8 have been revised, updating the testing schedule and granting the testing extension requested on July 3, 2008.

**SECTION IV: SPECIFIC CONDITIONS**

SN-01 and SN-03

**Glass Melting Furnaces**

Source Description

The raw materials are mixed and conveyed to one of two glass melting furnaces (SN-01 and Sn-03), where molten glass is produced. Natural gas burners provide the energy needed to melt the raw materials. Electrical boost systems help equalize the temperature in the flow of liquid glass in order to improve the quality of the finished glass. The electrical boost system is essentially a series of heating coils placed in the flow of liquid glass. No emissions are associated with the electrical boost systems.

Typical emissions from the glass furnaces include oxides of nitrogen (NO<sub>x</sub>), carbon monoxide (CO), and small amounts of particulate matter (PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), and volatile organic compounds (VOCs). These emissions are the by products resulting from the combustion of natural gas and the volatilization of impurities in the raw materials. Each furnace has three stacks that vent emissions.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition #5. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	“A” Glass Melting Furnace	PM10	14.6	106.9
		SO2	8.7	63.3
		VOC	5.9	42.8
		CO	2.9	21.4
		NOx	50.0	366.4
03	“C” Glass Melting Furnace	PM10	14.6	Emission bubble – combined with SN-01
		SO2	8.7	
		VOC	5.9	
		CO	2.9	
		NOx	50.0	

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition # 5. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SN	Description	Pollutant	lb/hr	tpy
01	“A” Glass Melting Furnace	PM	14.6	106.9
03	“C” Glass Melting Furnace	PM	14.6	Emission bubble combined with SN-01

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

SN	Limit	Regulatory Citation
01	20%	Regulation §19.503
03		

4. The permittee shall conduct daily observations of the opacity from sources SN-01 and SN-03 and keep a record of these observations. Visible emissions observations are only required for the glass furnace in operation. These observations shall be conducted by a person trained, but not necessarily certified in EPA Reference Method 9. If visible emissions appear to be in excess of 20%, 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 all observations, the cause of any visible emissions, and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [Regulation 19, §19.503 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The combined finished glass production from furnaces (SN-01, SN-03) shall not exceed 280 tons per day or 85,500 tons per year (both furnaces combined). The annual throughput limit shall be based upon a 12-month rolling total. [Regulation 19, §19.705 A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6]
6. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #5. The permittee shall keep a production log of combined finished glass production for the furnaces. The log shall be updated daily, totaled monthly, kept on site, and made available to Department personnel upon request. Monthly summaries of the glass production log shall be included in the semi-annual report as outlined in General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52 Subpart E]
7. Pipeline quality natural gas shall be the only fuel used for combustion at SN-01 and SN-03. [Regulation 19, §19.705 A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6]
8. The permittee shall conduct stack testing every five years on SN-01 (Furnace “A”) and SN-03 (Furnace “C”) in accordance with the following parameters:

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Item	Description	
Test Schedule	With issuance of permit 1440-AOP-R3, each furnace shall be tested once during the permit term.	
Pollutants	Total Particulate, SO <sub>2</sub> , VOC, CO, NO <sub>x</sub>	
Throughput	Within 10% of maximum capacity.	
EPA Reference Method	Total Particulate SO <sub>2</sub> VOC CO NO <sub>x</sub>	5 6C 25A 10 7E

Furnace sampling for each pollutant specified shall be conducted sequentially at all three vents for each furnace unless an alternative technique is approved by the Department prior to testing. Each test shall be coordinated in advance with the Compliance Inspector Supervisor, in accordance with Plantwide Condition 3. Testing was conducted on SN-01 (Furnace "A") on January 9-10, 2008 and SN-03 (Furnace "C") on October 8, 2008. [Regulation 19, §19.702, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52 Subpart E]

SN-04A, SN-04B, SN-04C, SN-04D, SN-04E, and SN-04F

**Raw Material Storage**

Source Description

High-silica sand, limestone, feldspar, and soda ash are the major raw materials used at the facility in the process of manufacturing glass. These materials are received in bulk by way of truck and railcar. They are off-loaded into storage silos, with one silo assigned to each material. Particulate emissions from the feldspar/nephelene silo (SN-04A), the soda ash silo (SN-04B), and the cullet silo (SN-04C) are controlled with fabric socks on top of the silos. Particulate emissions from the sand silo (SN-04D) and the limestone silo (SN-04E) are controlled with baghouses. The discharges from the silos are controlled with a baghouse (SN-04F).

Specific Conditions

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #13. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
SN-04A	Feldspar/Nephelene Storage Silo with Fabric Sock	PM <sub>10</sub>	0.2	0.1
SN-04B	Soda Ash Storage Silo with Fabric Sock	PM <sub>10</sub>	0.2	0.1
SN-04C	Cullet Silo with Fabric Sock	PM <sub>10</sub>	0.2	0.2
SN-04D	Sand Silo with Baghouse	PM <sub>10</sub>	0.1	0.2
SN-04E	Limestone Silo with Baghouse	PM <sub>10</sub>	0.1	0.1
SN-04F	Storage Silos Discharge with Baghouse	PM <sub>10</sub>	0.1	0.2

10. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #13. [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
SN-04A	Feldspar/Nepheline Storage Silo with Fabric Sock	PM	0.2	0.2
SN-04B	Soda Ash Storage Silo with Fabric Sock	PM	0.2	0.1
SN-04C	Cullet Silo with Fabric Sock	PM	0.2	0.1
SN-04D	Sand Silo with Baghouse	PM	0.1	0.2
SN-04E	Limestone Silo with Baghouse	PM	0.1	0.1
SN-04F	Storage Silos Discharge with Baghouse	PM	0.1	0.2

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

SN	Limit	Regulatory Citation
SN-04A SN-04B SN-04C	10%	Regulation 18, §18.501
SN-04D SN-04E SN-04F	5%	Regulation 18, §18.501

12. The permittee shall conduct observations of the opacity during each silo loading event from sources SN-04A through SN04E and keep a record of these observations. The permittee shall conduct weekly observations of the opacity from source SN-04F and keep a record of these observations. If the permittee detects visible emissions, 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 all observations, the cause of any visible emissions, and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

13. The annual throughput for the bulk storage silos shall be limited to the following:

SN	Raw Material	Annual Limit (Tpy)
04A	Feldspar/Nepheline	5,400

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<b>SN</b>	<b>Raw Material</b>	<b>Annual Limit (Tpy)</b>
04B	Soda Ash	24,000
04C	Cullet	46,000
04D	Sand Storage Silo	70,000
04E	Limestone Storage	16,000
04F	Storage Silos Discharge	Glass Product

Compliance with this condition shall be based upon a 12-month rolling total, and verified by monthly records of the raw materials. The permittee shall update the records by the fifteenth day of the month following the month to which it pertains. The records shall be kept on site, made available to Department personnel upon request, and shall be included in the semi-annual report as outlined in General Provision 7. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6]

14. All fabric filter control equipment (baghouses and socks) shall be operated in accordance with manufacturer's specifications. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-05

**Miscellaneous Natural Gas Combustion Sources**

Source Description

Arkansas Glass operates various natural gas combustion sources throughout the plant to facilitate the required heating of molten glass and other raw materials. The sources have relatively small firing rates. Since it is often necessary to add burners to the miscellaneous natural gas-fired equipment, emissions from these sources have been bubbled. See Specific Conditions #18, #19, and #20.

Specific Conditions

15. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #18, #19, and #20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
05	Miscellaneous Natural Gas Combustion Sources	PM <sub>10</sub>	0.4	1.7
		SO <sub>2</sub>	0.1	0.2
		VOC	0.3	1.2
		CO	4.2	18.1
		NO <sub>x</sub>	4.9	21.5

16. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #18, #19, and #20. [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
05	Miscellaneous Natural Gas Combustion Sources	PM	0.4	1.7

17. Pipeline quality natural gas shall be the only fuel used for combustion at the units designated as SN-05. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6]
18. The permittee shall limit the total heat input for all miscellaneous natural gas combustion sources designated as SN-05, at the facility, to 50 MM Btu/hr. Compliance with this condition shall be demonstrated through compliance with

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Specific Conditions #19 & #20 . [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

19. The permittee shall maintain an up-to-date list of all miscellaneous natural gas combustion equipment and associated firing rates designated as SN-05. Changes to the miscellaneous natural gas fired equipment list are allowed, provided:
  - a. The total firing rate of all miscellaneous equipment in the group does not exceed 50 MM Btu/hr; and
  - b. The equipment does not increase the actual production capacity of SN-01 or SN-03.

The permittee shall update the list immediately after a change, keep records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 40 CFR Part 52, Subpart E]

20. The permittee shall not construct, reconstruct, install, or modify any combination of miscellaneous natural gas combustion equipment that have a total heat input capacity greater than 10 MMBTU/hr without submitting the appropriate application and obtaining the Department's prior approval. [Regulation 19, §19.304 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-08

**Railcar Unloading Baghouse**

Source Description

Some raw materials for the glass manufacturing processes are received and unloaded by railcar. The particulate emissions from railcar unloading activities are controlled by a baghouse (SN-08).

Specific Conditions

21. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #25. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
SN-08	Railcar Unloading Baghouse	PM <sub>10</sub>	0.1	0.1

22. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #25. [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
SN-08	Railcar Unloading Baghouse	PM	0.1	0.1

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

SN	Limit	Regulatory Citation
SN-08	5%	Regulation §18.501

24. The permittee shall conduct weekly observations of the opacity from sources SN-08 and keep a record of these observations. If the permittee detects visible emissions, 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 all observations, the cause of any visible emissions, and the

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- corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
25. The permittee shall not exceed 29,400 tpy annual throughput at Railcar Unloading (SN-08). This limit shall be based upon a rolling 12-month total. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6]
  26. The permittee shall maintain records which document compliance with the railcar unloading throughput limit set forth in the preceding condition. The permittee shall update the records by the fifteenth day of the month following the month to which it pertains. The records, shall be kept on site and made available to Department personnel upon request, and shall be included in the semi-annual report as outlined in General Provision 7. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52 Subpart E]
  27. All fabric filter control equipment (baghouses and socks) shall be operated in accordance with manufacturer's specifications. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-09

**Forming Machine**

Source Description

Molten glass gob is cut from the forehearth channels and fed into the forming machine, where the container is pressed in blank molds. The majority of emissions from the forming process are generated from the glass gob coming into contact with the machine lubricant. These emissions are vented to the atmosphere through openings in the production building, and have been calculated using an assumption of total evaporation and historical usage data.

Specific Conditions

28. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition #29 . [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
09	Forming Machine	VOC	15.0	50.0

29. The permittee shall not exceed 100,000 lb/yr of lubricant usage at the Forming Machine (SN-09). This limit shall be based upon a rolling 12-month total. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6]
30. The permittee shall maintain records which document compliance with the lubricant throughput limit set forth in the preceding condition. These records shall be updated and totaled monthly, kept on site, and made available to Department personnel upon request. Monthly summaries of the lubricant usage shall be included in the semi-annual report as outlined in General Provision #7. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52 Subpart E]

SN-10

**Surface Coating Operations**

Source Description

A small surface coating operation to coat a portion of the glass containers. This operation will be located in a building one mile from the main facility. There will be a sample coating booth, a main painting booth, and a drying oven. The operation will utilize low VOC/HAP-free coatings and solvents. The drying oven is included in the existing miscellaneous SN-05.

Specific Conditions

31. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #32 and #33. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
10	Surface Coating	VOC	4.0	8.7

32. The permittee shall use HAP-free coatings and solvents and shall not exceed a VOC content of 2.0 lb/gal. [§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]
33. The permittee will maintain monthly records of VOC emissions from SN-10 which demonstrate compliance with Specific Condition #31 and #32. The permittee shall maintain the Material Data Safety Sheets (MSDS) on-site and validate that all MSDS sheets are current with each delivery. The permittee will maintain a twelve month rolling total of VOC emitted and each individual month's data on site and make these records available to Department personnel upon request. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. [§19.705 of Regulation 19, §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**

Arkansas Glass Container Corporation 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.

## SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall 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 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §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 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise 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 shall submit the compliance test results to the Department within thirty (30) days after completing the 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]
4. The permittee must provide:
  - c. Sampling ports adequate for applicable test methods;
  - d. Safe sampling platforms;
  - e. Safe access to sampling platforms; and
  - f. Utilities for sampling and testing equipment.

[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]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 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 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee must prepare and implement a Startup, Shutdown, and Malfunction Plan (SSM). If the Department requests a review of the SSM, the permittee will make the SSM available for review. The permittee must keep a copy of the SSM at the source's

location and retain all previous versions of the SSM plan for five years. [Regulation 19, §19.304 and 40 CFR 63.6(e)(3)]

#### Title VI Provisions

8. 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.
9. 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.
  - 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.
10. 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.
11. 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

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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.

12. 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.

**SECTION VII: INSIGNIFICANT ACTIVITIES**

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated February 28, 2008.

Description	Category
Refractory Shaker Screen (formerly SN-06A)	A-13
120 Gallon Gasoline Storage Tank (formerly SN-07A)	A-2
320 Gallon Diesel Storage Tank (formerly SN-7B)	A-3
Cullet Jaw Crusher	A-13
Cooling Towers (3)	A-13
Bottle Breaker	A-13
Spray Booth in Mold Shop	The sprayed mold release material contains no VOCs
Job Change Shop Internal Dust Collector	Discharges Air inside the Building
Mold Shop Internal Dust Collector	Discharges Air inside the Building

### SECTION VIII: GENERAL PROVISIONS

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. [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)]
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 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 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
  - 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.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

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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 26, §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If 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:

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

8. The permittee shall 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, § 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 shall 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 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 shall 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 by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

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), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §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 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 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 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 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 26, §26.701(F)(4)]

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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 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 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 26, §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 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 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 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 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 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;
  - c. 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 shall 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 26, §26.703(E)(3)]
  - 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 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 A.C.A. §8-4-304 and §8-4-311]
24. 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.

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[Regulation 18, §18.314(A), Regulation 19, §19.416(A), Regulation 26, §26.1013(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]

25. 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 facility's 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), Regulation 26, §26.1013(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]

26. 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), Regulation 26, §26.1013(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]