# ADEQ OPERATING AIR PERMIT

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

Permit No.: 0349-AOP-R1

Renewal: #1

IS ISSUED TO: ELECTROLUX HOME PRODUCTS

NASHVILLE, AR 71852

**HOWARD COUNTY** 

AFIN: 31-00023

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:

### AND

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN
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Signed:	
Keith Michaels	Date

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# **Table 1 - List of Acronyms**

A.C.A. Arkansas Code Annotated

CFR Code of Federal Regulations

CO Carbon Monoxide

CSN County Serial Number

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 Ton per year

UTM Universal Transverse Mercator

VOC Volatile Organic Compound

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# **Section I: FACILITY INFORMATION**

PERMITTEE: Electrolux Home products

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PERMIT NUMBER: 0349-AOP-R1

FACILITY ADDRESS: 1 Poulan Drive, Nashville, AR 71852

MAILING ADDRESS: 1 Poulan Drive, Nashville, AR 71852

COUNTY: Howard

CONTACT POSITION: Jerry Wilcox, Environmental Manager

REVIEWING ENGINEER: M. Lloyd Davis, P. E.

UTM North - South (Y): Zone 15 (3,753.9 km)

UTM East - West (X): Zone 15 (420.9 km)



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## **Section II: INTRODUCTION**

### **Summary of Permit Activity**

Electrolux Home Products (Electrolux) currently operates an industrial facility located in the city of Nashville (Howard County), Arkansas. The physical address of the site is 1 Poulan Drive. Electrolux manufactures a variety of gasoline-powered lawn and garden equipment products at the facility. These units include trimmers, edgers, blowers and related items. In addition, various gasoline-powered chain saws are also made on-site. The production operations at the Nashville facility are categorized using Standard Industrial Classification (SIC) Code 3524 (manufacture of lawn and garden equipment) and SIC Code 3546 (manufacture of power-driven hand tools).

This permit is a renewal of the original Title V permit for this facility, which was issued on July 16, 1998, to Frigidaire Home Products. Frigidaire changed its name to Electrolux in January, 2002. There are no changes in physical processing from the original permit, although total emission rates have been recalculated based on more recent AP-42 factors with an increase of 24.3 tpy. Some insignificant activities not previously listed have been added.

# **Process Description**

The production operations at the Nashville facility consist of the following: fabrication of metal components; sub-assembly and final assembly of the lawn and garden equipment and chain saws; performance testing of the gasoline-powered units; hand-wipe cleaning of the finished products; and, packaging of the equipment.

Electrolux utilizes a wide variety of metal parts during the production of lawn and garden equipment and chain saws. These components are fabricated on-site. The raw materials are pre-manufactured magnesium and aluminum castings. These items are purchased from outside vendors. The castings are subsequently machined using a variety of equipment (lathes, drill presses, etc.). General ventilation for the metal fabrication operations is provided by the facility's heating, ventilation and air-conditioning (HV AC) system. Mineral oil is utilized as a metalworking fluid and lubricant during the machining operations. The parts fabrication activities are an insignificant source of air emissions.

The various metal components are subsequently washed to remove residual oil and grease. Several steam-washer units are operated for this purpose. A non-volatile detergent solution ("Cleaner P3- T 5071" or equivalent) is used as the cleaning agent. The washers are exhausted directly to the atmosphere via several vents. The steam-washer units for degreasing metal parts are insignificant sources of air emissions.

After machining, some of the components are subjected to additional processing. Engine cylinders that are slated for chrome plating are routed to an "electrochemical de-burring" unit. The parts are mounted on metal posts and then immersed in an electrically-conductive solution (aqueous sodium

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nitrite). Electricity is then applied to the mounting posts. The electric charge bums the rough edges off the cylinders. The electrochemical de-burring unit is an insignificant source of fugitive air emissions. (On occasion, certain metal components must be filed by hand in order to meet product specifications.)

After de-burring, the engine cylinders are routed to a natural gas-fired drying oven. The components are then shipped off-site for chrome plating. The cylinder dry-off oven has a rated heat input capacity of 0.48 million British Thermal Units per hour (MMBTU/hr). The unit is exhausted directly to the atmosphere via a single vent. The aggregate air emissions from the natural gas-fired process equipment at the Poulan Drive Plant are designated as Source Number SN-03.

### **Product Assembly Operations**

The Poulan Drive Plant features six production lines for the sub-assembly and final-assembly of lawn and garden equipment products. These units include gasoline-powered trimmers, edgers, blowers and similar items. One additional production line is used for the assembly of gasoline-powered chain saws.

During the assembly operations, a variety of pre-manufactured plastic and metal parts are put together to produce the finished products. The metal components are fabricated on-site, whereas the plastic parts are purchased from vendors.

The sub- and final-assembly operations are primarily mechanical in nature. Small quantities of lubricants, greases, oils, etc. are processed. Any air emissions from these materials are insignificant. General ventilation for the production lines is provided by the building's HV AC system.

## **Engine Testing Operations**

Electrolux manufactures a wide variety of chain saws and lawn and garden equipment products at the Poulan Drive Plant. Small gasoline-fired two-cycle internal combustion engines are used to power these units.

As part of the company's Quality Control Program, each individual product is performance-tested after its assembly. The seven production lines at the Nashville facility are equipped with a series of engine test booths for this purpose. During testing, the two-cycle engines are fueled with unleaded gasoline, started, and then operated for a short period of time in order to check for defects, make carburetor adjustments, etc. After testing, any excess gasoline is removed from the engines using a vacuum system (i.e., "de-gassing process"). The fuel is then recycled.

Gasoline is dispensed at the engine test booths from centralized "day tanks." These portable containers can each hold 30 gallons of gasoline.

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The engine test booths are equipped with exhaust hoods. The gasoline combustion emissions are vented directly to the atmosphere via multiple stacks. No air pollution control devices are used. The facility-wide emissions from the engine test booths are designated as SN-01.

# **Product Cleaning Operations**

The production activities at the Poulan Drive Plant include hand-wipe cleaning of the finished lawn and garden equipment and chain saws. After testing in the engine test booths, the various products are wiped-down with a volatile solvent in order to remove residual oil and grease. Isopropyl alcohol is used as the cleaning agent. The solvent is manually applied using spray bottles and/or wiping cloths. After cleaning, the lawn and garden equipment and chain saws are allowed to air-dry prior to packaging. The product cleaning operations are performed at multiple locations throughout the production building. The fugitive alcohol emissions are exhausted via the plant's general ventilation system. The facility-wide solvent emissions at the Poulan Drive Plant are designated as SN-04. (A small amount of isopropyl alcohol is also used as a cleaning agent during parts fabrication. These emissions are accounted for at SN-04.)

# **Packaging Operations**

After testing and cleaning, the lawn and garden equipment 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 are an insignificant source of air emissions.

## **Miscellaneous Operations and Emission Sources**

The Poulan Drive Plant features several miscellaneous production operations and emission sources. These items are described below:

**Gasoline Storage Tank:** Unleaded gasoline is stored in a single aboveground tank. The fuel is subsequently used in the engine test booths. The gasoline tank is a horizontal, fixed-roof unit. The vessel has 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 device is used.

**Other Storage Tanks**: Three other aboveground storage tanks are also operated at the Nashville facility. These units all qualify as insignificant sources of air emissions. One such tank is used to store mineral oil for the parts fabricating activities. This vessel (no SN) has a capacity of 2,000 gallons. The second insignificant tank is used to store motor oil. This vessel (no SN) has a capacity of 500 gallons. The third insignificant tank is used to store diesel fuel for certain plant vehicles. This vessel (no SN) has a capacity of 250 gallons.

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**Boiler Units:** Two natural gas-fired boilers are operated at the Poulan Drive Plant. These units generate steam and hot water for the parts etching operation, the steam-washer units and other applications. Boiler #1 has a rated heat input capacity of 1.26 MMBTU/hr, whereas Boiler #2 has a fuel capacity of 1.67 MMBTU/hr. The boilers are operated concurrently. The units are exhausted directly to the atmosphere via separate vents. No air emission control devices are used. The aggregate air emissions from the natural gas-fired production equipment at the Poulan Drive Plant, including Boilers #1 and #2, are designated as SN-03.

**Parts Washers:** Several small parts washer stations are operated at the Poulan Drive Plant. These units are used to clean various metal parts during the fabrication process. Mineral spirits (i.e., petroleum naphtha) is used as the cleaning agent. Each station holds between 20 and 30 gallons of solvent. The parts washers are kept closed when not in use. Relatively small quantities of naphtha are processed at the Nashville facility on an annual basis. The parts washer stations are insignificant sources of air emissions.

# **Discontinued Production Operations**

Several manufacturing activities at the Poulan Drive Plant have been discontinued in recent years. These items are described below:

**Powder Painting Process:** A "powder paint" system (no SN) was once operated for the surface coating of certain metal components. This equipment has been taken out of service. Electrolux now used pre-painted metal parts.

**Touch-Up Painting:** At one time, the production operations included touch-up painting of the finished products. The lawn and garden equipment and chain saws were refurbished using aerosol spray cans. The touch-up painting activities were designated as SN-05. Electrolux has discontinued touch-up painting of the finished products. This operation (SN-05) has accordingly been deleted from the permit application.

**Gas-Fired Ovens:** Two natural gas-fired process units are no longer in service. The pre-heat oven (2.00 mmBTU/hr) was used to prepare metal parts for powder painting, whereas the paint-curing oven (2.00 mmBTU/hr) was used to dry the coated components. Both units were decommissioned when the powder painting system was shut down. The emissions from this equipment are no longer included in SN-03.

**Parts Tumbler:** A vibratory parts tumbler (no SN) was once operated on-site. This equipment was used to "de-burr" metal components after their fabrication. The parts tumbler unit has been decommissioned.

**Etching Process:** At one time, a multi-stage etching operation (no SN) was performed on-site. It was used to prepare certain engine cylinder units for long-term storage. The components were treated in baths of caustic and acid solutions. The etching process has been discontinued. The caustic and acid baths are no longer in service.

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**Plastic Extruder:** An extruder machine (no SN) was once operated at the Poulan Drive Plant. This equipment was used to make the plastic line for weed trimmers. The extruder unit has been relocated to another Electrolux facility.

# Regulations

The following table contains the regulations applicable to this permit.

**Table 2 – Regulations** 

Source No.	Regulation Citations
01	Regulation 18, Regulation 19, and Regulation 26
02	Regulation 18, Regulation 19, and Regulation 26
03	Regulation 18, Regulation 19, and Regulation 26
04	Regulation 18, Regulation 19, and Regulation 26

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.

Facility: Electrolux Home Products Permit No.: 0349-AOP-R1

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**Table 3 – Emission Summary** 

EMISSION SUMMARY						
Source No.	Description	Pollutant	Emission Rates		Lutant Emission Rates Cross Reference Page	Reference
			lb/hr	tpy		
Total Alle	owable Emissions	PM	0.7	0.7		
		$PM_{10}$	0.7	0.7		
		$SO_2$	0.6	0.6		
		VOC	151.4	84.8	-	
		CO	409.6	431.0	]	
		NO <sub>x</sub>	11.1	12.7	-	
HAPs*		Total	48.7	12.13		
Air Conta	aminants**	None Listed				
Individual HAPs over 1.0 tpy		MTBE*	12.56	3.01		
		Toluene*	15.35	3.68		
		Xylene*	9.77	2.35		
Miscellar	neous HAPs	Misc. HAPs*	11.02	3.09		
SN-01	Engine Test Booths	$PM_{10}$	0.7	0.7	15	
	21161114 1404 2004115	$SO_2$	0.6	0.6		
		VOC	14.7	15.5		
		СО	409.2	429.7		
_		NO <sub>x</sub>	10.7	11.2	-	
	HAPs	PM	0.66	0.69		
		Acetaldehyde	0.10	0.10		
		Benzene	0.73	0.77		
		Cumene	0.15	0.17		
		Ethyl Benzene	0.45	0.48		

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	EMISSION SUMMARY						
Source No.	Description	Pollutant	<b>Emission Rates</b>		Pollutant Emission Rates Cross Reference Page		Reference
			lb/hr	tpy			
		Formaldehyde	0.28	0.29			
		Hexane	0.74	0.78			
		MTBE	2.65	2.78			
		Naphthalene	0.18	0.18			
		Propionaldehyde	0.10	0.10			
		Toluene	3.24	3.40			
		Xylene	2.06	2.17			
SN-02	Gasoline Storage Tank	VOC	55.1	1.3	18		
	HAPs	Benzene	2.70	0.07			
		Cumene	0.56	0.02			
		Ethyl Benzene	1.66	0.04			
		Hexane	2.76	0.07			
		MTBE	9.91	0.23			
		Naphthalene	0.61	0.02			
		Toluene	12.11	0.28			
		Xylene	7.71	0.18			
SN-03	Combustion Equipment	CO NO <sub>x</sub>	0.4 0.4	1.3 1.5	20		
SN-04	Product Cleaning	VOC	81.6	68.0	22		

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

<sup>\*\*</sup>Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

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### **Section III: PERMIT HISTORY**

In 1976 the Beaird-Poulan Division of Emerson Electric Company began the construction of a facility in Nashville, Arkansas to manufacture 200,000 chainsaws annually. Beaird-Poulan Division submitted an application on March 15, 1976, and Air Permit 349-A was issued September 24, 1976. The air permit covered one pound per hour emissions from two wet dust collectors (rotoclones) which collected dust from the deburring of castings by chipping and sanding prior to machining. Fabric filters controlled the particulate emissions from a powder coating operation.

At an undetermined date the facility was reorganized as the Poulan/Weed Eater, Inc. ("Poulan"). On January 1, 1987, Poulan was acquired by White Consolidated Industries, Inc. ("WCI").

On October 21,1988, Poulan submitted a letter stating that sources covered by Air Permit 349-A had been removed from service. The letter also contained a list of other sources at the facility and gave justification as to why all these sources were exempt from notification and permitting requirements. The letter also stated that the facility wanted to maintain the permit.

The Department answered Poulan's letter on May 12, 1989, and stated that all of the additions and changes described therein were minor or resulted in a reduction of emissions and therefore, there was no need for a formal modification to Permit 349-A at that time.

An Air Division inspector inspected the facility on September 6, 1990. His report included a copy of Poulan's October 21, 1988, letter and the Department's May 12, 1989, reply. The inspector also made the following comments:

- 1. The facility had made large scale changes since the permit was issued in 1976.
- 2. The permit mentioned a production rate of 200,000 chainsaws per year. The rate was 200,000 small engines per month.
- 3. The facility was in compliance.

The next Air Division inspection was conducted on June 27, 1994. The Environmental Manager stated that no changes had been made since the last inspection. The Environmental Manager also said that Poulan did not have any permitted sources and the sources listed in the permit were no longer in service. If any operational changes were made, the Department would be notified. He also wanted to keep the permit active. The inspector reported the facility in compliance.

On June 24, 1994, Poulan submitted a letter requesting an official statement as to whether the two-cycle engine exhausts from the facility are exempt from Title V permitting requirements. The Department responded August 9, 1994, stating that the air emissions generated during the testing of two-cycle engines were exempt from air permitting requirements.

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On September 1, 1994, the Department's Permit Fee Coordinator submitted an invoice to Poulan for the annual air permit fee. The Environmental Manager for Poulan replied on October 20, 1994, with a letter stating that the original permitted source processes were discontinued and Poulan had not introduced any new processes which require permitting. He also included a copy of Poulan's October 21, 1988, letter and the Department's May 12, 1989, response. The letter stated that Poulan would not renew the permit by paying the permit fee. The Department voided the invoice.

However, Poulan's parent company, WCI, subsequently decided that a conservative interpretation of the exemption language would not allow the emissions from the engine test booths to be exempted from air permitting requirements. Poulan estimated that the Nashville facility's potential-to-emit for carbon monoxide (CO) exceeded the 100 tons per year threshold for status as a Title V major source. As a result, in October 1996, Poulan submitted to the Department an initial "short form" application for a Title V Operating Permit for the Nashville Lawn and Garden Plant. As mentioned in the introduction, Poulan was restructured in January 1997 and the name was changed to Frigidaire Home Products. Frigidaire Home Products submitted a full Title V application on March 10, 1997.

Permit 0349-AOP-R0 was issued on July 16, 1998. This initial Title V permit covered the manufacturing operations for gasoline powered lawn mowers, with the major pollutant being 407 tpy of CO from the engine test booths. Because of past history, the permitted rate of CO emissions did not represent a significant increase for PSD purposes. Product cleaning with IPA accounted for most of the VOC emissions.

Frigidaire changed its name to Electrolux Home Products in January, 2002.

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### **Section IV: SPECIFIC CONDITIONS**

### **Source No. SN-01 Description**

After assembly, all products are performance tested as part of Frigidaire's Quality Assurance Program. Each of the seven production lines at the facility is equipped with a series of test booths for this purpose. Each engine is fueled from a centralized day tank using a closed system. The engines are then started and run for approximately two minutes at full throttle. After the engine has warmed up, a technician adjusts the carburetor and conducts a performance test. Once tested, the excess fuel is removed (i.e., degassed) from the product by a vacuum system and stored in a day tank. A day tank is a portable 30 gallon fuel tank mounted on two dolly wheels that is used to fuel and degas the gines at the test booths. At the proposed production rate, a maximum of 105,000 gallons per year of gasoline will be combusted.

All engine test booths are equipped with exhaust hoods for venting of the gasoline combustion emissions. All the test booths on each production line is vented through one vent, therefore, there are seven test booth exhausts vented to the atmosphere. The seven vents are grouped together as a single source (SN-01). The VOC emissions from the associated fueling/degassing operations at the test booths are also included in SC-01.

Frigidaire has the option of using either regular unleaded gasoline or reformulated, oxygenated, gasoline as a fuel in the engine test booths (SN-01). The reformulated gasoline contains fewer HAPs and is a cleaner burning fuel than regular unleaded gasoline. All emissions are higher when combusting regular unleaded gasoline. Therefore, all emission limits are based on the combustion of regular unleaded gasoline in the test booths.

## **Specific Conditions**

1. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition by compliance with Specific Conditions Nos. 5 and 11. [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	tpy
PM <sub>10</sub>	0.7	0.7
SO <sub>2</sub>	0.6	0.6
VOC	14.7	15.5
СО	409.2	429.7
$NO_X$	10.7	11.2

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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 Specific Conditions Nos. 5 and 11. [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	tpy
PM	0.66	0.69
Acetaldehyde	0.10	0.10
Benzene	0.73	0.77
Cumene	0.15	0.17
Ethyl Benzene	0.45	0.48
Formaldehyde	0.28	0.29
Hexane	0.74	0.78
MTBE	2.65	2.78
Naphthalene	0.18	0.18
Propionaldehyde	0.10	0.10
Toluene	3.24	3.40
Xylene	2.06	2.17

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

**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

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4. The permittee will conduct weekly observations of the opacity from Source No. SN-01 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 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 onsite and make the records available to Department personnel upon request. [§19.705 and 40 CFR Part 52, Subpart E]

- 5. The maximum allowable usage of gasoline at the facility is 1,200 lons per 24 hour day, calculated on a monthly average basis. [§19.705, A.C.A. §8-4-203 referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
- 6. The permittee will maintain monthly records to demonstrate compliance with Specific Condition No. 6. The permittee will update the records by the fifteenth day of the month following the month. The permittee will keep the records onsite, and make the records available to Department personnel upon request.] [§19.705 and 40 CFR Part 52, Subpart E]
- 7. The permittee will keep all stored gasoline in closed containers and fueling and degassing of the engines shall be done in a manner that minimizes gasoline evaporation. [§19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
- 8. The permittee will use only regular unleaded gasoline or reformulated gasoline. [§18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311] [§19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

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### **Source No. SN-02 Description**

The facility has a 5,000 gallon above-ground gasoline storage tank located in a covered concrete block enclosure. The tank currently in operation is a horizontal cylindrical fixed roof tank that is vented to the atmosphere.

VOC emissions from a vented tank occur from breathing losses and working losses. Breathing losses result from the expansion and contraction of the tank contents during changes in barometric pressure or temperature. Working losses occur when filling or emptying the tank during use. The emissions ar the losses in a large vented tank.

The storage tank is filled by tanker truck when necessary. The tank outlet is a service station type pump with hose and nozzle. The tank is used only to fill the 30 gallon day tanks which are used to fuel the product in the test booths. The fuel in the storage tank is not taxed and therefore is not used to refuel plant vehicles. Facility vehicles are refueled at local service stations.

The tank is less than 40 cubic meters (10,566 gallons). Therefore, neither tank is subject to NSPS Subpart Kb, although records showing the dimensions and capacity of the storage vessels are available, as per §60.116b(a).

The unleaded gasoline contains HAPs according to the MSDS sheet. At the emission rates calculated for the tank, all the HAPs are below the de minimis level.

### **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 Condition No. 11. [§19.501 *et seq.* and 40 CFR Part 52, Subpart E]

**Table 7 – Maximum Criteria Emission Rates** 

Pollutant	lb/hr	tpy
VOC	55.1	1.3

10. 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 Condition No. 11. [§18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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Table 8 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
Benzene	2.70	0.07
Cumene	0.56	0.02
Ethyl Benzene	1.66	0.04
Hexane	2.76	0.07
MTBE	9.91	0.23
Naphthalene	0.61	0.02
Toluene	12.11	0.28
Xylene	7.71	0.18

- 11. The permittee will not use or consume more than 105,000 gallons of gasoline in any consecutive twelve month period for the purpose of producing and testing small engines. [§19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
- 12. The permittee will maintain monthly and 12 consecutive months gasoline usage records which demonstrate compliance with the limit listed in Specific Condition No. 11. Monthly reports shall be prepared containing the individual records for each of the last twelve months and the total of the twelve months. These records shall be kept on site and shall be made available to Department personnel upon request. A twelve consecutive month total and each month's data shall be submitted to the Department in accordance with General Provision No.7. [§19.705 and 40 CFR Part 52, Subpart E]

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# Source No. SN-03 Description

Electrolux has five pieces of natural gas fired production equipment at this facility. Since they are all small units with a total heat input of 7.41 MM BTU/hr, they have been grouped together as one source (SN-03). The emissions for these units have been calculated at their potential-to-emit (PTE), or theoretical maximum, of 8,760 hours per year. Therefore, no record keeping of natural gas usage will be required. Due to the size of the equipment, none are subject to any SPS regulations. The five units are:

1.	oiler #1	1.26 MM BTU/hr
2.	oiler #2	1.67 MM BTU/hr
3.	Cylinder Dry-Off Oven	0.48 MM BTU/hr
4.	Preheat Oven	2.00 MM BTU/hr
5.	Cure Oven	2.00 MM BTU/hr

The two test boilers supply heat for the various parts cleaning operations, the caustic and acid baths, and the hot water rinse tanks. The cylinder dry-off oven follows the cylinder etching operation to prevent corrosion by insuring the cylinders are completely dry before storing. The preheat oven is the first step in the powder coating operation. The oven insures that the parts are completely dry but its primary function is to heat the parts to the proper temperature before the powder coating is applied. The curing oven follows the powder coating application machine where it elevates the temperature to the curing point of the powder coating. Once cured and cooled, the painted parts are stored until required by the assembly department.

## **Specific Conditions**

13. The permittee will not exceed the emission rates set forth in the following table. The pounds per hour emission rates in the following table are the potential to emit (PTE) for all of the combustion equipment. [Regulation No. 19 §19.501 *et seq.* and 40 CFR Part 52, Subpart E]

Table 9 – Maximun	ı Criteria .	Emission 1	Rates
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Pollutant	lb/hr	tpy	
СО	0.4	1.3	
$NO_X$	0.4	1.5	

14. The permittee will not cause to be discharged to the atmosphere from any natural gas combusting equipment gases which exhibit an opacity greater than 5%. Compliance with this condition can be demonstrated by burning natural gas only. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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15. Pipeline quality natural gas will be the only fuel used in the permitted sources of SN-03 at this facility. The natural gas process equipment is permitted for their theoretical maximum or potential to emit (PTE). Therefore, no record keeping of natural gas usage is required. [§19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

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### **Source No. SN-04 Description**

After performance testing in the engine test booths, the product is wiped down with isopropyl alcohol in order to remove residual oil and grease from the testing activities. The solvent is manually applied using spray bottles and/or wiping cloths. After cleaning, the finished product is allowed to air dry prior to touch-up painting and/or packaging. Product cleaning is performed at multiple locations within the production building. The solvent evaporates into the plant's atmosphere and the emissions are exhausted via the plant's general ventilation system. The multiple cleaning stations are designated as one source (SN-04). At the production rate anticipated by Frigidaire, a maximum of 20,000 gallons per year of solvent will be utilized for cleaning and wipedown of the finished product.

# **Specific Conditions**

16. The permittee will not exceed the emission rates set forth in the following table. The pounds per hour emission rates in the following table are the potential to emit (PTE) for all the pieces of equipment. The permittee will demonstrate compliance with this condition by compliance with Specific Condition No. 18. [§19.501 *et seq.* and 40 CFR Part 52, Subpart E]

Pollutant lb/hr tpy
VOC 81.6 68.0

**Table 10 – Maximum Criteria Emission Rates** 

- 17. The permittee may substitute any non-HAP cleaning solvent for isopropyl alcohol provided the new material does not cause the facility to exceed the annual or hourly emission limitations for VOCs. Electrolux must receive permission from the Department before using any product cleaning solvent that contains a Hazardous Air Pollutant (HAP). [§19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
- 18. The permittee will not use more than an average of twelve (12) gallons of product cleaning solvent per hour, calculated on a monthly average basis, or more than 20,000 gallons of product cleaning solvent per consecutive 12 months. [§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 will maintain monthly and 12 consecutive months product cleaning solvent usage records which demonstrate compliance with the limits listed in Specific Condition No.18. A monthly report shall be prepared containing the individual records for each of the last twelve months and the total of the twelve months. These records shall be kept on site and shall be made available to Department personnel upon request. A twelve consecutive month total and each month's data shall be submitted to the Department in accordance with General Provision #7. [§19.705 and 40 CFR Part 52, Subpart E]

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# Section V: COMPLIANCE PLAN AND SCHEDULE

Electrolux Home Products does not currently have an enforcement action. 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) of 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
  - 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]

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### **Title VI Provisions**

7. 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.
- e. 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]
- 8. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - a. 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.
  - b. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - c. 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.)
  - d. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
- 9. 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.

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10. 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.

11. 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".

# **Permit Shield**

12. 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 7 - 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 March 6, 2003.

**Table 7 - Applicable Regulations** 

Source No.	Regulation	Description
Facility	Arkansas Regulation #19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation #26	Regulations of the Arkansas Operating Air Permits Program

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13. The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated March 6, 2003.

**Table 8 - Inapplicable Regulations** 

Source No.	Regulation	Description		
, 1		Standards for Small Industrial-Commercial- Institutional Steam Generating Units		
02	40 CFR Part 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984		

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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 §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 **March 3, 2003.** 

**Table 9 - Insignificant Activities** 

Description	Category
The fabrication of various metal components including	Group A, Item #13
the machining of magnesium and aluminum castings, the	and Group B, Item
lubrication systems for the metalworking equipment,	#58
and the storage and handling of mineral oil for use as a	
lubricant during the machining operation	
The electrochemical deburring unit for engine cylinders	Group A, Item #13
and the hand filing of various metal parts.	
The steam-washer units for the degreasing and cleaning	Group A, Item #13
of various metal components.	
The use of small quantities of lubricants during the	Group A, Item #13
assembly of various components.	
2,000-gallon storage tank for mineral oil.	Group A, Item #3
500-gallon storage tank for motor oil.	Group A, Item #13
The portable "day tanks" for gasoline storage on the	Group A, Item #13
production lines, the associated fuel transfer systems and	
filling of the day tanks at the bulk storage vessel.	
The small parts washer units and the associated storage	Group A, Item #2
and handling	

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 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 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 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 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]

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

- 8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. 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:
  - a. The facility name and location
  - b. The process unit or emission source deviating from the permit limit,
  - c. The permit limit, including the identification of pollutants, from which deviation occurs,
  - d. The date and time the deviation started,
  - e. The duration of the deviation,
  - f. The average emissions during the deviation,
  - g. The probable cause of such deviations,
  - h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
  - i. The name of the person submitting the report.

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9. 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 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. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

- 10. 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) and §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]
- 11. 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)]
- 12. 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)]
- 13. 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)]
- 14. 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)]
- 15. 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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16. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 19. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]

- 17. 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)]
- 18. 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)]
- 19. 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)]
- 20. 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)]
- 21. 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;
  - 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.
- 22. 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.
- 23. 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.
- 24. 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]

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Request for PDS Invoice				
Invoice Number (assigned	PDS-			
when invoice printed)				
-				
AFIN r	31-00023			
Name	Electrolux Home Products			
(for confirmation only)				
Invoice Type (pick one) r	Initial	Mod X	Variance	
	Annual	Renewal X	Interim	
			Authority	
	0349-AOP R1			
Media Code r	A			
Fee Code or Pmt Type r	T5			
Fee Description	Title V			
(for confirmation only)	(for confirmation only)			
Amount Due r (whole dollar	nount Due r (whole dollar No Charge			
amount only)				
Printed Comment(600	Increase in e	missions is due	entirely to cha	nges in AP-42 factors.
characters maximum)				
Note: The information below is	for use by the	e requesting divi	sion if desired	; it will not print on the
invoice.	_	_		·
Engineer	Lloyd Davis			
Paid? (yes/no)	No			
Check number				
Comments				
r Required data (See "g:\codes)	Misc\PDS_Fe	eCodes.wpd" fo	or descriptions	and discussions of fee
Request submitted by:			Date:	

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### 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) currently operates an industrial facility located in the city of Nashville (Howard County), Arkansas. The physical address of the site is 1 Poulan Drive. Electrolux manufactures a variety of gasoline-powered lawn and garden equipment products at the facility. This permit is a renewal of the original Title V permit for this facility, which was issued on July 16, 1998, to Frigidaire Home Products. Frigidaire changed its name to Electrolux in January, 2002. There are no changes in physical processing from the original permit, although total emission rates have been recalculated based on more recent AP-42 factors with an increase of 24.3 tpy. Some insignificant activities not previously listed have been added.

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 Lloyd Davis, Engineer. Citizens can reach both Doug Szenher and Lloyd Davis 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. The Hempstead Public Library, 500 South Elm Street, Hope, AR 71801 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