ADEQ
OPERATING
AIR PERMIT

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

Permit #: 721-AOP-R2

IS ISSUED TO:

Varco Pruden Buildings, Inc.
2622 West 17th Street
Pine Bluff, AR 71603
Jefferson County
CSN: 35-0058

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:

September 1, 1998 and August 31, 2003

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE:	Varco Pruden Buildings, Inc.
CSN:	35-0058
PERMIT NUMBER:	721-AOP-R2
FACILITY ADDRESS:	2622 West 17th Street Pine Bluff, AR 71603
COUNTY:	Jefferson
CONTACT POSITION:	Skip Triplett
TELEPHONE NUMBER:	(870) 534-1602
REVIEWING ENGINEER:	Ann Wellinghoff
UTM North-South (Y):	3785.67
UTM East-West (X):	589.34 Zone 15

SECTION II: INTRODUCTION

Summary of Permit Activity

Varco Pruden Buildings, Inc. of 2622 West 17th Street, Pine Bluff, Arkansas is a major manufacturer of low-rise non-residential metal buildings. This is the second modification to this facility's initial Title V permit. This permitting action is necessary to correct volatile organic compound (VOC) and hazardous air pollutant (HAP) emission rates, and to correct the VOC content and HAP content of paints, solvents, and lubricants. This permitting action also allows the permitted solvent based paint usage to increase from 35,000 gallons per year to 62,010 gallons per year, the panel solvent lubricant usage limit to increase from 7,865 gallons per year to 8,750 gallons per year, and the thinner usage limit to decrease from 26,775 gallons per year to 1,610 gallons per year. In addition, this modification permits several HAPs that were previously unpermitted. The new parent company (GRUPO IMSA/IMSATEC) and contact person are also identified. This modification will result in permitted increases of: 9.0 tons per year (tpy) VOC, 3.4 tpy Ethyl Benzene, 0.01 tpy Isopropyl Benzene, 1.3 tpy Methanol, 0.1 Methyl Ethyl Ketone, and 0.2 tpy Glycol Ethers.

The permittee is emitting VOCs at a rate above 100 tpy, and HAPs at a rate above 25 tpy, so a Title V permit is mandatory. Xylene and Glycol Ethers are emitted at rates in excess of 10 tpy, the Title V threshold for individual HAPs. Because of economics and required rates of evaporation, the Xylene cannot be replaced with a solvent that is not on the Section 112(b) list of HAPs.

Process Description

The manufacturing process includes fabrication and coating of four categories of components:

Primary Structural Framing
This category typically consists of custom "I" beam sections fabricated from steel plate and bar stock, with related connection plates and stiffeners welded in place. These parts are cut, punched, fitted, welded and painted as required by job specification. Flat steel plates are cut underwater with a plasma arc cutting machine. Once cut, these plates undergo various welding operations: submerged arc welding process, mig welding process, torch cutting and small parts welding. Parts are then hand fitted to the basic beam shapes and finish welding, grinding, and cutting is performed. Finally, various parts are painted with a hand spray airless gun or by submerging the part into paint.

Secondary Structural Framing
This category typically consists of custom "Z" and "C" shapes rollformed from hot roll strip steel from coils, or small parts fabricated from hot rolled angle or plate. These parts are cut, punched, fitted, welded and painted as required by job specification. A gage paint coater is used to paint the "Z" and "C" and angle shapes by airless spraying paint inside an enclosed chamber which the shapes pass through. The unapplied paint is returned to be used again. A conveyor style dip painting operation is used to paint small parts. The painted items from the gage coater and small parts dip tank are dried by passing through a 2.5 million BTU natural gas fired drying oven. Round rods are hand sprayed with an airless spray gun attached to the gage coater. Parts are hand fitted to basic beam shapes and finish welding, grinding, and cutting is performed to complete the secondary frames. A propane fueled gage forklift is used to handle material in this department.

Panels
This category typically consists of custom sheetmetal shapes rollformed from pre-finished coil stock. These parts are decoiled, rollformed, and cut to length as required by job specification. This department consists of two rollforming lines. On the SSR rollforming line, a rollformer shapes SSR roof panels from coil sheetmetal stock in various pre-coated finishes. On the Panel Rib rollforming line, a rollformer shapes Panel Rib roof and wall panels from coil sheetmetal stock in various pre-coated finishes. Roof panels with galvalume finish requires pre-forming lubrication (SN-03) and all finishes require mastic installation. Saw lumber and fabricate special equipment crates are used for shipment. A propane fueled forklift is used to handle material in this department.

Trim
This category typically consists of custom sheetmetal shapes rollformed or brake formed from pre-finished coil stock. These parts are decoiled, cut to length, slit, rollformed or brake formed as required by job specification.

This manufacturing process has three significant emission sources: Water Based Painting (SN-01), Solvent Based Painting (SN-02), and Panel Solvent Lubrication (SN-03). Both water based paint and solvent based paint are used in spray operations. Solvent based paint is primarily used in welded primary and secondary structural framing member coating, while water based paint is primarily used in non-welded secondary structural framing member, small parts, and rod coating. Pre-forming lubrication is used on galvalume finish panels. Cleaning Operations (SN-04) accounts for the facility wide usage of methyl ethyl ketone to remove small amounts of paint from the product as necessary.

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Regulations

Varco Pruden Buildings, Inc. is subject to regulation under the *Arkansas Air Pollution Control Code* (Regulation 18), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulations of the Arkansas Operating Air Permit Program* (Regulation 26). This facility is currently not subject to 40 CFR Part 60, Subpart TT - *Standards of Performance for Metal Coil Surface Coating* since this facility only coats metal sheets that have already been cut from metal coils (i.e., the facility does not coat a continuous metal strip).

Summary of Emissions

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		VOC	54.4	237.3	N/A
HAPs*		Ethyl Benzene*	2.3	9.6	
		Glycol Ethers*	5.2	22.3	
		Isopropyl Benzene*	<0.01	<0.01	
		Methanol*	0.3	1.3	
		Methyl Ethyl Ketone*	0.1	0.1	
		Xylene*	10.4	45.0	
SN-01	Water Based Painting	VOC	12.1	52.9	9
		Glycol Ethers*	5.1	22.1	
SN-02	Solvent Based Painting	VOC	35.6	155.4	9
		Ethyl Benzene*	2.3	9.6	
		Glycol Ethers*	0.1	0.2	
		Isopropyl Benzene*	<0.01	<0.01	
		Methanol*	0.3	1.3	
		Xylene*	10.4	45.0	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-03	Panel Solvent Lubrication	VOC	6.6	28.9	9
SN-04	Cleaning Operations	VOC Methyl Ethyl Ketone*	0.1 0.1	0.1 0.1	14

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

SECTION III: PERMIT HISTORY

Permit No. 721-A was issued to VP Buildings, Inc., on September 23, 1983. This was the initial permit for the facility which permitted emissions from the manufacture of fabricated metal buildings. Emissions were quantified to be 2 pounds of VOCs per gallon of paint used. These emissions were totaled for a paint spray booth and drying oven, which emitted 25 pounds per hour and 5 pounds per hour, respectively.

Permit No. 721-AR-1 was issued to VP Buildings, Inc., on June 20, 1990. This modification to the existing SIP permit called for the inclusion of emissions from surface coating operations that were installed at the facility prior to obtaining this permit modification. Permitted emissions from the facility were VOCs and totaled 113 pounds per hour and 172.6 tons per year. At the time of this permit issuance, all of the painting was done with solvent based paint.

Permit No. 721-AOP-R0 was issued to VP buildings, Inc., on September 1, 1998. This was the initial Title V permit for the facility. Based upon maximum operation of 8,760 hours/year, VP Buildings, Inc. was using VOCs at a rate above 100 tpy, and HAPs at a rate above 25 tpy, so that a Title V permit was mandatory. Both Xylene and Ethylene Glycol Monobutyl Ether were used at rates in excess of 10 tpy, the threshold for individual HAPs. Because of economics and required rates of evaporation, the Xylene could not be replaced with a solvent that is not on the Section 112(b) list of HAPs. At the time of this permit issuance, water based paint accounted for 28,600 gallons of the 90,375 gallons of paint used at the facility. An additional 7,685 gallons of solvent lubricant was also in use. At the time, the water based coatings were not providing the necessary degree of corrosion resistance as primers, and were more expensive per dry mil than solvent based coatings, so that no significant reduction in solvent based paints was forecast.

Permit No. 721-AOP-R1 was issued to VP Buildings, Inc. on February 6, 2001. This was the first modification to the initial Title V permit for the facility. This permitting action increased the permitted throughput of its water-based paint usage from 28,600 gallons per year to 38,295 gallons per year, resulting in an increase of 6.1 tons per year of VOC emissions. Emissions for the HAP ethylene glycol monobutyl ether increased as well, by 5.6 tons per year.

SECTION IV: EMISSION UNIT INFORMATION

Varco Pruden Buildings, Inc.
Permit #: 721-AOP-R2
CSN #: 35-0058

SN-01, SN-02, and SN-03
Painting and Lubricating Operations

Source Description

SN-01 is primarily a water based painting operation. A gage paint coater, an airless hand spray gun, and a small parts dip tank are used for the application of the water based paint. The gage paint coater is a custom in-house built, enclosed, continuous paint spraying chamber which sprays and recycles water based paint to coat secondary structural as part of an automatic punching, rollforming, and painting line. It also coats miscellaneous other products by manual feed when the rollforming line is not running. This equipment was installed in the middle 1980s and is rebuilt periodically when worn. The airless hand spray gun is attached to the gage coater for touchup and windbrace rod painting. This equipment was installed in the early 1990s and is rebuilt periodically when worn. The small parts dip tank is a conveyor style dip painting operation. The general area is ventilated by roof and wall fans.

SN-02 is primarily a solvent based painting operation. Airless spray guns are used for the application of the solvent based paint. The airless spray guns are attached to an airless spray pumping system which are used to hand spray paint primary and secondary structural framing members and miscellaneous other components. This equipment was installed in the 1970s and is replaced periodically when worn. Some electrostatic paint guns were installed in 2002. The general area is ventilated by roof and wall fans.

SN-03 is panel solvent lubrication application. The roll-coat lubrication application equipment is inline with two automatic panel rollforming lines. It applies a solvent based lubrication to galvalume coil stock entering the rollformers to avoid roll tooling damage from coating deposits. This equipment was installed when the rollformers were purchased in the 1970s and early 1980s. The general area is ventilated by wall fans.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #6.

SN	Pollutant	lb/hr	tpy
01	VOC	12.1	52.9

SN	Pollutant	lb/hr	tpy
02	VOC	35.6	155.4
03	VOC	6.6	28.9

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Conditions #5 and #7.

SN	Pollutant	lb/hr	tpy
01	Glycol Ethers	5.1	22.1
02	Ethyl Benzene	2.3	9.6
	Glycol Ethers	0.1	0.2
	Isopropyl Benzene	<0.01	<0.01
	Methanol	0.3	1.3
	Xylene	10.4	45.0

3. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not exceed the following throughputs in any consecutive twelve month period. Compliance with this condition will be demonstrated by specific throughput record keeping and as required by Specific Condition #6.

SN	Product Used	Maximum Annual Usage (gallons)
01	Water Based Paint	38,295
02	Solvent Based Paint	62,010
02	Thinner	1,610
03	Panel Solvent Lubricant (Isopar M)	8,750

4. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the following daily HAP emission rates. Compliance with this condition will be demonstrated by daily record keeping as required by Specific Condition #5.

SN	Pollutant	lb/day
01	Glycol Ethers	122.4
02	Ethyl Benzene	55.2
	Glycol Ethers	2.4
	Isopropyl Benzene	0.24
	Methanol	7.2
	Xylene	249.6

5. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain daily records of paint and solvent usage, HAP emissions, and HAP content of paints and solvents used. These records shall be kept in the form of Appendix A, or similar format to demonstrate compliance with the daily limits set in Specific Condition #4. Records shall be updated daily. These records shall be kept on site, and shall be made available to Department personnel upon request. These records shall be submitted to the Department in accordance with General Provision 7.

6. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain monthly records of paint and solvent usage, VOC emissions, and VOC content of paints and solvents used. These records shall be kept in the form of Appendix B, or similar format to demonstrate compliance with the annual limits set in Specific Conditions #1 and #3. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. Twelve month rolling totals and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request. These records shall be submitted to the Department in accordance with General Provision 7.

7. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records of paint and solvent usage, HAP emissions, and HAP content of paints and solvents used. These records shall be kept in the form of Appendix B, or similar format to demonstrate compliance with the annual limits set in Specific Conditions #2 and #3. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. Twelve

month rolling totals and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request. These records shall be submitted to the Department in accordance with General Provision 7.

8. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the following VOC contents. Compliance with this condition will be demonstrated by maintaining Material Safety Data Sheets as required by Specific Condition #9.

SN	Pollutant	Maximum Pollutant Content (lb/gal)
01	VOC	2.76
02	VOC (Content of Paint)	4.82
02	VOC (Content of Thinner)	7.3
03	VOC	6.60

9. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain Material Safety Data Sheets which demonstrate compliance with Specific Condition #8.

10. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the following pollutant contents. Compliance with this condition will be demonstrated by maintaining Material Safety Data Sheets as required by Specific Condition #11.

SN	Pollutant	Maximum Pollutant Content (lb/gal)
01	Glycol Ethers	1.15
02	Ethyl Benzene (Content of Paint)	0.27
02	Ethyl Benzene (Content of Thinner)	1.46
02	Glycol Ethers	0.005
02	Isopropyl Benzene	6.2×10^{-5}
02	Methanol	0.04

SN	Pollutant	Maximum Pollutant Content (lb/gal)
02	Xylene (Content of Paint)	1.28
02	Xylene (Content of Thinner)	6.57

11. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain Material Safety Data Sheets which demonstrate compliance with Specific Condition #10.

SN-04
Cleaning Operations

Source Description

SN-04 is a non-point source. This source accounts for the facility wide usage of Methyl Ethyl Ketone to remove small amounts of paint from the product as necessary.

Specific Conditions

12. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Conditions #15 and #17.

SN	Pollutant	lb/hr	tpy
04	VOC	0.1	0.1

13. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Conditions #15 and #17.

SN	Pollutant	lb/hr	tpy
04	Methyl Ethyl Ketone	0.1	0.1

14. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the usage of Methyl Ethyl Ketone shall not exceed 12 gallons in any consecutive twelve month period. Compliance with this condition will be demonstrated by record keeping as required by Specific Condition #15.

15. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records of the amount of Methyl Ethyl Ketone used. These records shall be kept in the form of Appendix C, or similar format to demonstrate compliance with Specific Conditions #14. Records shall be updated by the fifteenth day of the month following the month to which the records

pertain. A twelve month rolling total and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request. These records shall be submitted to the Department in accordance with General Provision 7.

16. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the VOC content of the Methyl Ethyl Ketone used at SN-04 shall not exceed 6.68 pounds of VOC per gallon. Compliance with this condition will be demonstrated by maintaining Material Safety Data Sheets as required by Specific Condition #17.

17. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain Material Safety Data Sheets which demonstrate compliance with Specific Condition #16.

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Varco Pruden Buildings, Inc. is presently operating under the authority of Consent Administrative Order LIS 01-086. Issuance of Air Permit #721-AOP-R2 puts the facility back into compliance. The facility shall continue to operate in compliance with those identified regulatory provisions. The facility shall 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. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.

2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.

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

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

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

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

6. Pursuant to §19.3(c) of Regulation 19, the permittee shall maintain the exhaust fans and filters of the spray booths in a full operational manner. The stacks and vents shall not

become blocked, clogged, or in any way become inoperable as to prevent ventilation of the painting areas.

7. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee may substitute a new VOC containing product for a currently permitted product if the proposed product has a total VOC and VHAP (Volatile Hazardous Air Pollutant) content equal to or less than the permitted product. (The relative toxicity of the substituted product should be a higher number, since lower relative toxicities are more toxic). The weighted toxicity of the VHAPs in the new product must also be equal to or less than the replaced product, using the method for calculating TLVs for mixtures in Appendix C of the ACGIH publication "Threshold Limit Values for Chemical Substances". Prior to implementing usage of a new product with a higher VOC content or higher VHAP rating, the permittee shall request approval from the Department in writing. The notice shall include a copy of the MSDS for the original product and the replacement product. The hourly and annual rate of usage shall also be included in the notice. The Department will determine if an air permit modification is required.

8. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

Acid Rain (Title IV)

9. Pursuant to §26.701 of Regulation #26 and 40 CFR 70.6(a)(4), the permittee is prohibited from causing any emissions which exceed any allowances that the source lawfully holds under Title IV of the Act or the regulations promulgated thereunder. No permit revision is required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. This permit establishes no limit on the number of allowances held by the permittee. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement of this permit or the Act. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Act.

Title VI Provisions

10. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 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.

11. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

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.

12. 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.

13. 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.

14. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated May 22, 2000.

Description	Category
Gage Drying Oven	A-1
Welding Operations	A-7
Diesel Fuel Storage Tank	A-3
Gasoline Storage Tank	A-3
Propane Storage Tank	A-3

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

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.

2. Pursuant to 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, 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.

3. Pursuant to §26.406 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall 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.

4. Pursuant to 40 CFR 70.6(a)(1)(ii) and §26.701(A)(2) of Regulation #26, 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, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.

5. Pursuant to 40 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) of Regulation #26, records of monitoring information required by this permit shall include the following:

    a. The date, place as defined in this permit, and time of sampling or measurements;
    b. The date(s) analyses were performed;
    c. The company or entity that performed 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.

6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) of Regulation #26, records of all required monitoring data and support information shall be retained for a period of 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.

7. Pursuant to 40 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

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

8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.701(C)(3)(b) of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made 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 which is 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.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they 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 such report will serve as both the initial report and full report.

9. Pursuant to 40 CFR 70.6(a)(5) and §26.701(E) of Regulation #26, and A.C.A.§8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall 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.

10. Pursuant to 40 CFR 70.6(a)(6)(i) and §26.701(F)(1) of Regulation #26, 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, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

11. Pursuant to 40 CFR 70.6(a)(6)(ii) and §26.701(F)(2) of Regulation #26, 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 in order to maintain compliance with the conditions of this permit.
12. Pursuant to 40 CFR 70.6(a)(6)(iii) and §26.701(F)(3) of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.

14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.701(F)(5) of Regulation #26, the permittee shall 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 shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.

15. Pursuant to 40 CFR 70.6(a)(7) and §26.701(G) of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.

16. Pursuant to 40 CFR 70.6(a)(8) and §26.701(H) of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.

17. Pursuant to 40 CFR 70.6(a)(9)(i) and §26.701(I)(1) of Regulation #26, if the permittee is allowed to operate under 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 scenario under which the facility or source is operating.

18. Pursuant to 40 CFR 70.6(b) and §26.702(A) and (B) of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

19. Pursuant to 40 CFR 70.6(c)(1) and §26.703(A) of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.

20. Pursuant to 40 CFR 70.6(c)(2) and §26.703(B) of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:

    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 that must be kept 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 the purpose of assuring compliance with this permit or applicable requirements.

21. Pursuant to 40 CFR 70.6(c)(5) and §26.703(E)(3) of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:

    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. Pursuant to §26.704(C) of Regulation #26, nothing in this permit shall alter or affect the following:

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

APPENDIX A

Total Emissions for SN-01 (Daily Records)
Varco Pruden Buildings, Inc. Permit #721-AOP-R2 CSN: 35-0058

SN-01 Water Based Painting Emissions							
Week of (mo/day/yr)_____	Sun	Mon	Tues	Wed	Thu	Fri	Sat
Product-Specific Emissions for SN-01							
Product 22-N119G Bronze WR L&C Free Primer MSDS#_____ Material Density (lb/gal) 10.06 VOC Content (lb/gal) 2.76 Glycol Ethers Content (lb/gal) 1.15							
Gallons Used							
Glycol Ethers Emissions (lbs)							
Product 22-F126G Fed Std 36251 Gray W/R L&C Free MSDS#_____ Material Density (lb/gal) 10.13 VOC Content (lb/gal) 2.70 Glycol Ethers Content (lb/gal) 1.11							
Gallons Used							
Glycol Ethers Emissions (lbs)							
Total Emissions for SN-01							
Total Glycol Ethers Emissions (lbs)							

Product-Specific Emissions = Pollutant Content (lb/gal) x Gallons Used
Total Emissions = Sum of All Product-Specific Emissions

Total Emissions for SN-02 (Daily Records)
Varco Pruden Buildings, Inc. Permit #721-AOP-R2 CSN: 35-0058

SN-02 Solvent Based Painting Emissions							
Week of (mo/day/yr)_____	Sun	Mon	Tues	Wed	Thu	Fri	Sat
Product-Specific Emissions for SN-02							
Product Bronze Dip Primer MSDS#_____ Material Density (lb/gal) 8.84 VOC Content (lb/gal) 4.6 Ethyl Benzene Content (lb/gal) 0.26 Glycol Ethers Content (lb/gal) 0.005 Isopropyl Benzene Content (lb/gal) 6.19×10^{-5} Methanol Content (lb/gal) 0.03 Xylene Content (lb/gal) 1.25							
Gallons Used							
Ethyl Benzene Emissions (lbs)							
Glycol Ethers Emissions (lbs)							
Isopropyl Benzene Emissions (lbs)							
Methanol Emissions (lbs)							
Xylene Emissions (lbs)							
Product Fed Std 36251 Gray Dip Primer MSDS#_____ Material Density (lb/gal) 9.07 VOC Content (lb/gal) 4.82 Ethyl Benzene content (lb/gal) 0.23 Glycol Ethers Content (lb/gal) 0.004 Methanol Content (lb/gal) 0.03 Xylene Content (lb/gal) 1.10							
Gallons Used							
Ethyl Benzene Emissions (lbs)							
Glycol Ethers Emissions (lbs)							
Methanol Emissions (lbs)							
Xylene Emissions (lbs)							

Total Emissions for SN-02 (Daily Records continued)
Varco Pruden Buildings, Inc. Permit #721-AOP-R2 CSN: 35-0058

SN-02 Solvent Based Painting Emissions (continued)							
Week of (mo/day/yr)_____	Sun	Mon	Tues	Wed	Thu	Fri	Sat
Product-Specific Emissions for SN-02 (continued)							
Product White Solvent Base Primer MSDS#_____ Material Density (lb/gal) 10.05 VOC Content (lb/gal) 4.6 Ethyl Benzene content (lb/gal) 0.25 Glycol Ethers Content (lb/gal) 0.005 Isopropyl Benzene Content (lb/gal) $6.03x10^{-5}$ Methanol Content (lb/gal) 0.03 Xylene Content (lb/gal) 1.19							
Gallons Used							
Ethyl Benzene Emissions (lbs)							
Glycol Ethers Emissions (lbs) (lbs) (							
Isopropyl Benzene Emissions (lbs)							
Methanol Emissions (lbs)							
Xylene Emissions (lbs)							
Product Fed Std #30111Red Oxide Primer MSDS#_____ Material Density (lb/gal) 8.87 VOC Content (lb/gal) 4.63 Ethyl Benzene Content (lb/gal) 0.27 Glycol Ethers Content (lb/gal) $7.03x10^{-4}$ Methanol Content (lb/gal) 0.04 Xylene Content (lb/gal) 1.28							
Gallons Used							
Ethyl Benzene Emissions (lbs)							
Glycol Ethers Emissions (lbs)							
Methanol Emissions (lbs)							
Xylene Emissions (lbs)							

Total Emissions for SN-02 (Daily Records continued)
Varco Pruden Buildings, Inc. Permit #721-AOP-R2 CSN: 35-0058

SN-02 Solvent Based Painting Emissions (continued)							
Week of (mo/day/yr)_____	Sun	Mon	Tues	Wed	Thu	Fri	Sat
Product-Specific Emissions for SN-02 (continued)							
Product Xylene (Thinner) MSDS#_____ Material Density (lb/gal) 7.3 VOC Content (lb/gal) 7.3 Xylene Content (lb/gal) 6.57 Ethyl Benzene Content (lb/gal) 1.46							
Gallons Used							
Ethyl Benzene Emissions (lbs)							
Xylene Emissions (lbs)							
Total Emissions for SN-02							
Total Ethyl Benzene Emissions (lbs)							
Total Glycol Ethers Emissions (lbs)							
Total Isopropyl Benzene Emissions (lbs)							
Total Methanol Emissions (lbs)							
Total Xylene Emissions (lbs)							

Product-Specific Emissions = Pollutant Content (lb/gal) x Gallons Used
Total = Sum of All Product-Specific Emissions

APPENDIX B

Total Emissions for SN-01 (Monthly Records)
Varco Pruden Buildings, Inc. Permit #721-AOP-R2 CSN: 35-0058

SN-01 Water Based Painting Emissions																								
Calendar Year_____	Jan		Feb		Mar		Apr		May		Jun		Jul		Aug		Sept		Oct		Nov		Dec	
	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *
Product 22-N119G Bronze WR L&C Free Primer MSDS#_____ Material Density (lb/gal) 10.06 VOC Content (lb/gal) 2.76 Glycol Ethers Content (lb/gal) 1.15																								
Gallons Used																								
VOC Emissions (lbs)																								
Glycol Ethers Emissions (lbs)																								
Product 22-F126G Fed Std 36251 Gray W/R L&C Free MSDS#_____ Material Density (lb/gal) 10.13 VOC Content (lb/gal) 2.70 Glycol Ethers Content (lb/gal) 1.11																								
Gallons Used																								
VOC Emissions (lbs)																								
Glycol Ethers Emissions (lbs)																								
Total Emissions for SN-01																								
Total Gallons Used																								
Total VOC Emissions (lbs)																								
Total Glycol Ethers Emissions (lbs)																								

Product-Specific Emissions = Pollutant Content (lb/gal) x Gallons Used
Total Emissions = Sum of All Product-Specific Emissions
* 12 Month Rolling Total for Previous 12 Months

Total Emissions for SN-02 (Monthly Records)
Varco Pruden Buildings, Inc. Permit #721-AOP-R2 CSN: 35-0058

SN-02 Solvent Based Painting Emissions																								
Calendar Year_____	Jan		Feb		Mar		Apr		May		Jun		Jul		Aug		Sept		Oct		Nov		Dec	
	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *
Product Bronze Dip Primer MSDS#_____ Material Density (lb/gal) 8.84 VOC Content (lb/gal) 4.6 Ethyl Benzene Content (lb/gal) 0.26 Glycol Ethers Content (lb/gal) 0.005 Isopropyl Benzene Content (lb/gal) $6.19x10^{-5}$ Methanol Content (lb/gal) 0.03 Xylene Content (lb/gal) 1.25																								
Gallons Used																								
VOC Emissions (lbs)																								
Ethyl Benzene Emissions (lbs)																								
Glycol Ethers Emissions (lbs)																								
Isopropyl Benzene Emissions (lbs)																								
Methanol Emissions (lbs)																								
Xylene Emissions (lbs)																								
Product Fed Std 36251 Gray Dip Primer MSDS#_____ Material Density (lb/gal) 9.07 VOC Content (lb/gal) 4.82 Ethyl Benzene Content (lb/gal) 0.23 Glycol Ethers Content (lb/gal) 0.004 Methanol Content (lb/gal) 0.03 Xylene Content (lb/gal) 1.10																								
Gallons Used																								
VOC Emissions (lbs)																								
Ethyl Benzene Emissions (lbs)																								
Glycol Ethers Emissions (lbs)																								
Methanol Emissions (lbs)																								
Xylene Emissions (lbs)																								

SN-02 Solvent Based Painting Emissions (continued)																								
Calendar Year_____	Jan		Feb		Mar		Apr		May		Jun		Jul		Aug		Sept		Oct		Nov		Dec	
	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *
Product White Solvent Base Primer MSDS#_____ Material Density (lb/gal) 10.05 VOC Content (lb/gal) 4.6 Ethyl Benzene Content (lb/gal) 0.25 Glycol Ethers Content (lb/gal) 0.005 Isopropyl Benzene Content (lb/gal) 6.03×10^{-5} Methanol Content (lb/gal) 0.03 Xylene Content (lb/gal) 1.19																								
Gallons Used																								
VOC Emissions (lbs)																								
Ethyl Benzene Emissions (lbs)																								
Glycol Ethers Emissions (lbs)																								
Isopropyl Benzene Emissions (lbs)																								
Methanol Emissions (lbs)																								
Xylene Emissions (lbs)																								
Product Fed Std #30111Red Oxide Primer MSDS#_____ Material Density (lb/gal) 8.87 VOC Content (lb/gal) 4.63 Ethyl Benzene Content (lb/gal) 0.27 Glycol Ethers Content (lb/gal) 7.03×10^{-4} Methanol Content (lb/gal) 0.04 Xylene Content (lb/gal) 1.28																								
Gallons Used																								
VOC Emissions (lbs)																								
Ethyl Benzene Emissions (lbs)																								
Glycol Ethers Emissions (lbs)																								
Methanol Emissions (lbs)																								
Xylene Emissions (lbs)																								

SN-02 Solvent Based Painting Emissions (continued)																								
Calendar Year_____	Jan		Feb		Mar		Apr		May		Jun		Jul		Aug		Sept		Oct		Nov		Dec	
	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *
Product Xylene (Thinner) MSDS#_____ Material Density (lb/gal) 7.3 VOC Content (lb/gal) 7.3 Xylene Content (lb/gal) 6.57 Ethyl Benzene Content (lb/gal) 1.46																								
Gallons Used																								
VOC Emissions (lbs)																								
Ethyl Benzene Emissions (lbs)																								
Xylene Emissions (lbs)																								
Total Emissions for SN-02																								
Total Gallons of Paint Used																								
Total Gallons of Thinner Used																								
Total VOC Emissions (lbs)																								
Total Ethyl Benzene Emissions (lbs)																								
Total Glycol Ethers Emissions (lbs)																								
Total Isopropyl Benzene Emissions (lbs)																								
Total Methanol Emissions (lbs)																								
Total Xylene Emissions (lbs)																								

Product-Specific Emissions = Pollutant Content (lb/gal) x Gallons Used
Total Emissions = Sum of All Product-Specific Emissions
***** 12 Month Rolling Total for Previous 12 Months

SN-03 Panel Solvent Lubrication Emissions																								
Calendar Year_____	Jan		Feb		Mar		Apr		May		Jun		Jul		Aug		Sept		Oct		Nov		Dec	
	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *
Product Isopar M MSDS#_____ Material Density (lb/gal) 6.60 VOC Content (lb/gal) 6.60																								
Total Gallons Used																								
Total VOC Emissions (lbs)																								

Total VOC Emissions = VOC Content (lb/gal) x Total Gallons Used

***** 12 Month Rolling Total for Previous 12 Months

APPENDIX C

Records for SN-04
Varco Pruden Buildings, Inc. Permit #721-AOP-R2 CSN: 35-0058

SN-04 Cleaning Operations																								
Calendar Year_____	Jan		Feb		Mar		Apr		May		Jun		Jul		Aug		Sept		Oct		Nov		Dec	
	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *	MTD	12-mo *
Product Methyl Ethyl Ketone MSDS#_____ Material Density (lb/gal) 6.68 VOC Content (lb/gal) 6.68 Methyl Ethyl Ketone Content (lb/gal) 6.68																								
Total Gallons Used																								

* 12 Month Rolling Total for Previous 12 Months