

# OPERATING AIR PERMIT

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

Permit #: 814-AOP-R0

IS ISSUED TO:

Correll, Inc.  
500 Moore Street  
Charleston, AR 72933  
Franklin County  
CSN: 24-0057

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

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Keith A. Michaels

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Date

## **SECTION I: FACILITY INFORMATION**

<b>PERMITTEE:</b>	Correll, Inc.
<b>CSN:</b>	24-0057
<b>PERMIT NUMBER:</b>	814-AOP-R0
<b>FACILITY ADDRESS:</b>	500 Moore Street Charleston, Arkansas 72933
<b>COUNTY:</b>	Franklin
<b>CONTACT POSITION:</b>	L.B. Boughfman-president
<b>TELEPHONE NUMBER:</b>	(501) 965-2247
<b>REVIEWING ENGINEER:</b>	Maria Watts
<b>UTM North-South (X):</b>	3906.1
<b>UTM East-West (Y):</b>	405.7

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## **SECTION II: INTRODUCTION**

Correll, Inc. owns and operates a facility in Charleston which manufactures tables, bookcases, and computer furniture. The furniture is assembled from metal and particle board. In the manufacturing process, metal parts are fabricated, particle board is laminated and cut to size, and then the two are assembled. A detailed process description follows.

### *Metal Legs and Aprons*

Tubular steel and strip steel is cut to correct lengths, bent to desired shapes, and punched. These pieces are then welded together to form the table legs and aprons. The parts are placed on a conveyor and then run through a unit that cleans them in a recirculating caustic cleaner and coats them in a recirculating phosphitizer (SN-01) for paint adhesion. The parts are then dried in a natural gas fired dryer (SN-02). The conveyor carries the parts to the paint booths where enamel paint is applied electrostatically. After drying in an oven, the parts are taken to be assembled.

### *Table tops and Shelves*

Particle board is processed by applying a thin paper laminate or formica laminate to one side using heat and pressure. The laminate contains a layer of hot glue applied to one side. This forms the top of the table. Particle board for the bookcases have the paper or formica sheets attached by a water-based glue. Some small pieces are prepared with the use of an aerosol adhesive. No stains or paints or other materials are used on any wood or particle board at the facility. After the lamination process, the boards are cut to the correct size. The edges are then routed so that a plastic band may be placed around the table top. Sawdust from this operation is collected by cyclones (SN-09, SN-10, and SN-13). Some pieces may require sanding or drilling.

Once the table tops are completed, they are assembled with the lower apron and legs. The finished product is ready for sale. This completes the manufacturing process at the facility.

Emissions from the facility are primarily from the painting process. A summary of facility wide emissions is provided in the following table. Specific emission unit information is located by the indicated cross reference page(s).

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM/PM <sub>10</sub>	6.83	26.9	
		SO <sub>2</sub>	0.03	0.3	
		VOC*	113.06	244.9	
		CO	0.12	0.6	
		NO <sub>x</sub>	0.71	2.3	
		phosphoric acid	0.2	0.5	
		molybdic acid	0.02	0.1	
		copper sulfate	0.02	0.1	
		xylene	23.3	54.0	
		toluene	16.0	37.0	
		ethyl benzene	4.8	11.0	
		hexane	1.4	1.2	
SN-01	Phosphate Washer	PM/PM <sub>10</sub>	0.01	0.1	8
		SO <sub>2</sub>	0.01	0.1	
		VOC	0.01	0.1	
		CO	0.06	0.4	
		NO <sub>x</sub>	0.40	1.7	
		phosphoric acid	0.20	0.5	
		molybdic acid	0.02	0.1	
		copper sulfate	0.02	0.1	
SN-02	Drying Oven	PM/PM <sub>10</sub>	0.01	0.1	10
		SO <sub>2</sub>	0.01	0.1	
		VOC	0.01	0.1	
		CO	0.03	0.1	
		NO <sub>x</sub>	0.11	0.5	
SN-03, SN-04, and SN-11	(2) Electrostatic Paint Booths and (2) Touch up Booths	VOC*	102.5	235.8	11
		xylene	23.3	54.0	
		toluene	16.0	37.0	
		ethyl benzene	4.8	11.0	

\* denotes HAPs are included in the VOC emission rate limit.

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-05 and SN-06	Paint Bake Oven	PM/PM <sub>10</sub>	0.01	0.1	12
		SO <sub>2</sub>	0.01	0.1	
		VOC	0.04	0.1	
		CO	0.03	0.1	
		NO <sub>x</sub>	0.2	0.1	
SN-07	Cement Lamination	VOC*	10.4	8.6	13
		hexane	1.4	1.2	
SN-08	Removed From Service Permit 814-AOP-R0				
SN-09, SN-10, and SN-13	Sawdust Cyclones	PM/PM <sub>10</sub>	6.8	26.6	14
SN-12	Removed From Service Permit 814-AOP-R0				
SN-14	Parts Washer	VOC	0.1	0.2	15

\* denotes HAPs are included in the VOC emission rate limit.

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

Air permit 814-A was issued to Correll, Inc. on June 5, 1987. This permit was the first air permit for this facility. The permit established VOC usage limits for the painting and laminating process. Allowable emission rates were also established for particulate matter and VOCs.

On August 20, 1990, Correll was issued air permit 814-AR-1. The modification included the installation of two new paint booths. The painting operation was originally installed in the 1970's and operated essentially unchanged until 1989. In 1989 a fire destroyed the two paint booths.

Air permit 814-AR-2 was issued to Correll, Inc. on April 7, 1992. This modification included the installation of a second cyclone in order to increase dust collection efficiency. No other changes were addressed in this permitting action.

On May 11, 1992, Correll, Inc. submitted an application proposing to modify air permit 814-AR-2. The facility proposed to install a touch-up spray paint booth to their existing operations. The hours of operation were also increased which caused an increase in paint and solvent usage. Air permit 814-AR-3 was issued to Correll, Inc. on July 13, 1992.

Air permit 814-AR-4 was issued to Correll, Inc. on June 21, 1993. The facility proposed to modify its existing permit to more accurately reflect actual operations at the facility and to allow for an expected increase in production over the next several years. Emissions from combustion sources were also added to the total allowable emissions.

Air permit 814-AOP-R0 is the first operating air permit issued to Correll, Inc. under Regulation 26. Four main changes have occurred at the facility. First, Correll no longer stains particle board, therefore, Roller Coater #1 (SN-08) has been removed from service. VOC emissions from this source have been allocated to the paint and touch-up booths. Second, the Process Equipment Coating process has been eliminated. Next, a third cyclone will be added to aid in sawdust collection. And finally, emissions from a small parts washer located in the maintenance shop will be quantified.

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#### **SECTION IV: EMISSION UNIT INFORMATION**

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**SN-01**  
**Phosphate Washer**

**Source Description**

Metal legs and aprons are made from tubular or strip steel which has been cut to size, bent to desired shapes, and punched. The parts are then welded together and placed on a conveyor. The parts are run through a unit that cleans them in a recirculating caustic cleaner and coats them in a recirculating phosphitizer for paint adhesion.

**Specific Conditions**

1. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with Specific Condition 3 and Plantwide Condition 6 shall represent compliance with this source's applicable requirements.

SN-#	Pollutant	lb/hr	tpy
01	PM/PM <sub>10</sub>	0.01	0.1
	SO <sub>2</sub>	0.01	0.1
	VOC	0.01	0.1
	CO	0.06	0.4
	NO <sub>x</sub>	0.40	1.7

2. Pursuant to §18.5 of Regulation 18, the permittee shall not exceed 10 percent opacity from SN-01 as measured by EPA Reference Method 9.
3. Pursuant to §19.5 of Regulation 19, natural gas is the only fuel permitted for use in the phosphate washer.
4. Pursuant to §18.8 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed the air contaminant emission rates set forth in the following table.



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SN-#	Pollutant	lb/hr	tpy
01	phosphoric acid	0.2	0.5
	molybdic acid	0.02	0.1
	copper sulfate	0.02	0.1

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**SN-02**  
**Drying Oven**

**Source Description**

A natural gas fired oven is used to dry metal parts that have been sent through the phosphate washer. The oven which was installed in 1987 has a heat input capacity of 0.8 MMBtu/hr.

**Specific Conditions**

5. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with Specific Condition 7 and Plantwide Condition 6 shall represent compliance with this source's applicable requirements.

<b>SN-#</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
02	PM/PM <sub>10</sub>	0.01	0.1
	SO <sub>2</sub>	0.01	0.1
	VOC	0.01	0.1
	CO	0.03	0.1
	NO <sub>x</sub>	0.11	0.5

6. Pursuant to §18.5 of Regulation 18, the permittee shall not exceed 10 percent opacity from SN-02 as measured by EPA Reference Method 9.
7. Pursuant to §19.5 of Regulation 19, natural gas is the only fuel permitted for use in the drying oven.

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**SN-03, SN-04, and SN-11**  
**Electrostatic Paint Booths and Touch Up Booths**

**Source Description**

Solvent based enamel paints are used to coat the metal parts in two (2) electrostatic paint booths (SN-03 and SN-04). The booths were installed in 1987. The touch-up paint booth (SN-11) is used to recoat parts which did not receive enough paint in the initial paint process. This booth was installed in 1992.

**Specific Conditions**

8. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with Plantwide Conditions 9 and 10 shall represent compliance with this source's applicable requirements.

SN-#	Pollutant	lb/hr	tpy
03, 04, and 11	VOC*	102.5	235.8
	xylene	23.3	54.0
	toluene	16.0	37.0
	ethyl benzene	4.8	11.0

9. Pursuant to §18.5 of Regulation 18, the permittee shall not exceed 10 percent opacity from SN-03, SN-04 and SN-11 as measured by EPA Reference Method 9.
10. Pursuant to §18.8 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed the air contaminant emission rates set forth in the following table. Compliance with Plantwide Conditions 9 and 10 shall represent compliance with this source's applicable requirements.

SN-#	Pollutant	lb/hr	tpy
03, 04, and 11	xylene	23.3	54.0
	toluene	16.0	37.0
	ethyl benzene	4.8	11.0

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**SN-05 and SN-06**  
**Paint Bake Oven**

**Source Description**

After the metal parts of the tables are coated with paint, the parts are dried in a natural gas fired oven (SN-05 and SN-06). The oven which was installed in 1987 has a heat input capacity of 1.5 MMBtu/hr.

**Specific Conditions**

11. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with Specific Condition 13 and Plantwide Condition 6 shall represent compliance with this source's applicable requirements.

SN-#	Pollutant	lb/hr	tpy
05 and 06	PM/PM <sub>10</sub>	0.01	0.1
	SO <sub>2</sub>	0.01	0.1
	VOC	0.04	0.1
	CO	0.03	0.1
	NO <sub>x</sub>	0.2	0.1

12. Pursuant to §18.5 of Regulation 18, the permittee shall not exceed 10 percent opacity from SN-05 and SN-06 as measured by EPA Reference Method 9.
13. Pursuant to §19.5 of Regulation 19 and Plantwide Condition 6, natural gas is the only fuel permitted for use in the drying oven.

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**SN-07**  
**Cement Lamination**

**Source Description**

Particle board is processed by applying a thin paper laminate or formica laminate to one side using heat and pressure. The laminate contains a layer of hot glue applied to one side. This forms the top of the table. Particle board for the bookcases have the paper or formica sheets attached by a water-based glue. Some small pieces are prepared with the use of an aerosol adhesive. No stains or paints or other materials are used on any wood or particle board at the facility.

**Specific Conditions**

14. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with Plantwide Condition 11 shall demonstrate compliance with this source's applicable requirements.

<b>SN-#</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
07	VOC	10.4	8.5

15. Pursuant to §18.5 of Regulation 18, the permittee shall not exceed 10 percent opacity from SN-07 as measured by EPA Reference Method 9.

16. Pursuant to §18.8 of the Arkansas Air Pollution Control Code (Regulation 18), the permittee shall not exceed the air contaminant emission rates set forth in the following table. Compliance with Plantwide Condition 11 shall represent compliance with this source's applicable requirements.

<b>SN-#</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
07	hexane	1.4	1.2

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**SN-09, SN-10, and SN-13**  
**Sawdust cyclones**

**Source Description**

After the lamination process, the boards are cut to the correct size. The edges are then routed so that a plastic band may be placed around the table top. Sawdust from this operation is collected by cyclones (SN-09, SN-10, and SN-13). The cyclones were installed in 1987, 1992, and 1997, respectively.

**Specific Conditions**

17. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

<b>SN-#</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
09, 10, and 13	PM/PM <sub>10</sub>	6.8	26.6

18. Pursuant to §18.5 of Regulation 18, the permittee shall not exceed 10 percent opacity from SN-09, SN-10, and SN-13 as measured by EPA Reference Method 9.
19. Pursuant to §19.7, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall inspect the cyclones and sawdust collection bins each day it is in operation. The bin shall be monitored to insure that it does not overflow and that no visible emissions from the cyclones extend beyond the property line.

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**SN-14**  
**Parts Washer**

**Source Description**

A small parts washer located in the maintenance shop uses solvent to clean equipment parts from the process.

**Specific Conditions**

20. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

<b>SN-#</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
14	VOC	0.1	0.2

21. Pursuant to §18.5 of Regulation 18, the permittee shall not exceed 10 percent opacity from SN-09, SN-10, and SN-13 as measured by EPA Reference Method 9.

## **SECTION V: PLANTWIDE CONDITIONS**

1. Pursuant to §19.4(o) of Regulation 19, 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 §19.4(q) of Regulation 19, construction must commence within eighteen (18) months after the approval of the permit application. Records must be kept for two years which will enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset condition, and continuous monitoring data. The records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.
3. Pursuant to §19.7 of Regulation 19, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein 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. 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. The permittee shall provide:
  - (1) Sampling ports adequate for applicable test methods
  - (2) Safe sampling platforms
  - (3) Safe access to sampling platforms
  - (4) Utilities for sampling and testing equipment
4. Pursuant to A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
5. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, this permit shall supersede and void all previously issued air permits for this facility.
6. Pursuant to A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, natural gas usage shall not exceed 31.6 million cubic feet during any consecutive twelve month period.



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7. Pursuant to §19.7 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Plantwide Condition 6. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.
8. Pursuant to A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 110 gallons of solvent during any consecutive twelve month period in the parts washer. The solvent shall not exceed a VOC content of 2.6 lb/gal and shall contain no HAPs.
9. Pursuant to A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 44,237 gallons of enamel paint during any consecutive twelve month period. The enamel paint shall not exceed a VOC content of 5.1 lb/gal.
10. Pursuant to A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 33,126 gallons of solvent during any consecutive twelve month period. The solvent shall not exceed a VOC content of 7.42 lb/gal and have an RT (relative toxicity) value equal to or greater than one.
11. Pursuant to A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed 3285 gallons of aerosol adhesive during any consecutive twelve month period. The aerosol adhesive shall not exceed a VOC content of 5.19 lb/gal and HAP content of 0.71 lb/gal. The HAP shall have an RT value equal to or greater than one.
12. Pursuant to §19.7 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Plantwide Conditions 8, 9, 10, and 11. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted to the Department in accordance with General Provision 7. (See Appendix A)

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## **SECTION VI: DE MINIMIS EMISSION SOURCES**

Pursuant to §26.3(d) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), the following sources are below the de minimis emission levels. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not de minimis, even if this activity meets the criteria of §3(e) of Regulation 26 or is listed below. De minimis emission determinations rely upon the information submitted by the permittee in an application dated March 10, 1997.

- \* welding operations
- \* diesel fire water pump
- \* unpaved parking lot
- \* heat lamination
- \* forklifts
- \* 500 gallon LPG tank

Pursuant to §26.3(d) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), the following emission units, operations, or activities have been determined by the Department to be below the de minimis emission levels. Activities included in this list are allowable under this permit and need not be specifically identified.

1. Natural gas-burning equipment with a design rate less than 1 million BTU per hour.
2. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emission from loading racks or fueling operations covered under any applicable federal requirements.
3. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
4. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

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5. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
6. Consumer use of office equipment and products, not including commercial printers or businesses primarily involved in photographic reproduction.
7. Janitorial services and consumer use of janitorial products.
8. Internal combustion engines used for landscaping purposes.
9. Laundry activities, except for dry-cleaning and steam boilers.
10. Bathroom/toilet emissions.
11. Emergency (backup) electrical generators at residential locations.
12. Tobacco smoking rooms and areas.
13. Blacksmith forges.
14. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
15. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.<sup>1</sup>
16. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface coating or products.

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<sup>1</sup> Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

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17. Portable electrical generators that can be “moved by hand” from one location to another.<sup>2</sup>
18. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.
19. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.<sup>3</sup>
20. Air Compressors and pneumatically operated equipment, including hand tools.
21. Batteries and battery charging stations, except at battery manufacturing plants.
22. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.<sup>4</sup>
23. Containers of less than or equal to 5 gallons in capacity that do not emit any detectable VOCs or HAPs when closed. This includes filling, blending, or mixing of the contents of such containers by a retailer.
24. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
25. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solution, provided appropriate lids and covers are used and appropriate odor control is achieved.
26. Drop hammers or presses for forging or metalworking.

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<sup>2</sup>“Moved by hand” means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

<sup>3</sup>Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately.

<sup>4</sup>Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

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27. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
28. Vents from continuous emission monitors and other analyzers.
29. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
30. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.
31. Equipment used for surface coating, painting, dipping, or spraying operations, containing less than 0.4 lb/gal VOCs, has no hexavalent chromium, and emits no more than 0.1 tpy of all other HAPs.
32. Lasers used only on metals and other materials which do not emit HAPs in the process.
33. Consumer use of paper trimmers/binders.
34. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boiler delivering the steam.
35. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
36. Laser trimmers using dust collection to prevent fugitive emissions.
37. Bench-scale laboratory equipment used for physical or chemical analysis.
38. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
39. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
40. Hydraulic and hydrostatic testing equipment.
41. Environmental chambers not using hazardous air pollutant gases.

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42. Shock chambers, humidity chambers and solar simulators.
43. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
44. Process water filtration systems and demineralizers.
45. Demineralized water tanks and demineralizer vents.
46. Boiler water treatment operations, not including cooling towers.
47. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.
48. Oxygen scavenging (de-aeration) of water.
49. Ozone generators.
50. Fire suppression systems.
51. Emergency road flares.
52. Steam vents and safety relief valves.
53. Steam leaks.
54. Steam cleaning operations.
55. Steam and microwave sterilizers.
56. Site assessment work to characterize waste disposal or remediation sites.
57. Miscellaneous additions or upgrades of instrumentation.
58. Emissions from combustion controllers or combustion shutoff devices.

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59. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units or such vehicles (i.e. antifreeze, fuel additives).
60. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
61. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
62. Residential wood heaters, cookstoves, or fireplaces.
63. Barbecue equipment or outdoor fireplaces used in conjunction with any residential or recreational use.
64. Log wetting areas and log fumes.
65. Periodic use of pressurized air for cleanup.
66. Solid waste dumpsters.
67. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.
68. Natural gas odoring activities unless the Department determines that a nuisance may occur.
69. Emissions from engine crankcase vents.
70. Storage tanks used for the temporary containment of materials resulting from an emergency reporting of an unanticipated release.
71. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
72. Mixers, blenders, roll mills, or calenders for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.
73. The storage, handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to equipment only).

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- 74. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
- 75. Tall oil soap storage, skimming, and loading.
- 76. Water heaters used strictly for domestic (non-process) purposes.
- 77. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
- 78. Agricultural operations, including onsite grain storage.



## **Title VI Provisions**

6. 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 is 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 interstate commerce pursuant to §82.106.
  - b. The placement of 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.
7. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, excepts 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.

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- 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.
8. If the permittee manufactures, transforms, 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.
9. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant 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 system used on passenger buses using HCFC-22 refrigerant.

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10. 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: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b) (2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 as the 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 as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 C.F.R. 70.6(a) (2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), 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 §26.4 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 C.F.R. 70.6(a) (1) (ii) and §26.7 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 C.F.R. 70.6(a) (3) (ii) (A) and §26.7 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 C.F.R. 70.6(a) (3) (ii) (B) and §26.7 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 C.F.R. 70.6(a) (3) (iii) (A) and §26.7 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

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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 Pollution Control and Ecology  
Air Division  
ATTN: Compliance Inspector Supervisor  
Post Office Box 8913  
Little Rock, AR 72219

8. Pursuant to 40 C.F.R. 70.6(a) (3) (iii) (B), §26.7 of Regulation #26, and §19.6 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 within 24 hours of 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

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submit a full report in writing (by facsimile, overnight courier, or other means) within 24 hours of discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 C.F.R. 70.6(a) (5) and §26.7 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 C.F.R. 70.6(a) (6) (i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance 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.
11. Pursuant to 40 C.F.R. 70.6(a) (6) (ii) and §26.7 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 C.F.R. 70.6(a) (6) (iii) and §26.7 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 C.F.R. 70.6(a) (6) (iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.

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14. Pursuant to 40 C.F.R. 70.6(a) (6) (v) and §26.7 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 C.F.R. 70.6(a) (7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 C.F.R. 70.6(a) (8) and §26.7 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 C.F.R. 70.6(a) (9) (i) and §26.7 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 C.F.R. 70.6(b) and §26.7 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.



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19. Pursuant to 40 C.F.R. 70.6(c) (1) and §26.7 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 C.F.R. 70.6(c) (2) and §26.7 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 C.F.R. 70.6(c) (5) and §26.7 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;

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- 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 §26.7 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.

## APPENDIX A

## APPENDIX B

## APPENDIX C

## APPENDIX D

**AIR DIVISION**  
**INVOICE REQUEST FORM**

(9-96)

**Facility Name & Address:**

Correll, Inc.  
P.O. Box 417  
Charleston, Arkansas  
72933-0417

**CSN:** 24-0057

**Permit No:** 814-AOP-R0

**Permit Description:**

(e.g. A = AIR CODE, S=SIP, H=NESHAP, P=PSD, N=NSPS, T5= Title V)  
T5

**Initial Fee Calculations:**

**Title V** = **3**(17.39)(TPY each pollutant, except CO) - amount of last annual air permit fee

$$= (17.39) * (26.9 + 0.3 + 244.9 + 0.6 + 2.3 + 0.5 + 0.1 + 0.1) - \$4141$$
$$= \$653.42$$

NOTE: Do Not double count HAPs and VOCs!!!  
No greater than 4000 tpy per pollutant or less than \$1000

**Mod Fee Calculations:**

**Title V** = **3** (17.39)(TPY increase of each pollutant, except CO)

NOTE: Do Not double count HAPs and VOCs!!!  
No greater than 4000 tpy for each contaminant but not less than \$1000

F =

**Fee Amount:** \$654.00

**Engineer:** Maria Watts

**Date:** May 16, 1997

## Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Pollution Control and Ecology gives the following notice:

Correll, Inc. owns and operates a facility which manufactures folding tables, bookcases and computer furniture located at 500 Moore Street in Charleston, Arkansas. Air permit 814-AOP-R0 is the first operating air permit issued to Correll, Inc. under Regulation 26. Four main changes have occurred at the facility. First, Correll no longer stains particle board, therefore, Roller Coater #1 (SN-08) has been removed from service. VOC emissions from this source have been allocated to the paint and touch-up booths. Second, the Process Equipment Coating process has been eliminated. Next, a third cyclone will be added to aid in sawdust collection. And finally, emissions from a small parts washer located in the maintenance shop will be quantified. Air permit 814-AOP-R0 will replace air permit 814-AR-4.

The application has been reviewed by the staff of the Department and has 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 Rhonda Sharp. Citizens desiring technical information concerning the application or permit should contact Maria Watts. Both Rhonda Sharp and Maria Watts can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72219 (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Fort Smith Public Library, 61 South Eighth, Fort Smith, AR 72901. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Part III of this Department's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Randall Mathis  
Director