

ADEQ

ARKANSAS
Department of Environmental Quality

AUG 5 2010

Franklin Healey, Engineering Manager
SAF-Holland USA, Inc.
PO Box 825
Dumas, AR 71639

Dear Mr. Healey:

The enclosed Permit No. 1951-AR-3 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 11/23/2009.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 1951-AR-3 for the construction, operation and maintenance of an air pollution control system for SAF-Holland USA, Inc. to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8.603, within thirty (30) days after service of this decision.

All persons submitting written comments during this thirty (30) day period, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates
Chief, Air Division

**Holland USA, Dumas
1103 South Main Street
Dumas, Arkansas 71639
AFIN: 21-00079**

**Response to Comments on Draft Minor Source Air Permit
1951-AR-2**

On or about April 7th, 2010, the Director of the Arkansas Department of Environmental Quality gave notice of the draft permitting decision for the above referenced facility. During the comment period interested person(s) submitted written comments, data views, or arguments on the draft permitting decision. The Department's response to these issues and comments follows.

Comment 1:

Page 9, SN-02 Conditions

8. The coatings or cleaners used at SN-02 shall not contain more than 6.52 pounds of VOC per gallon. The permittee shall maintain Material Safety Data Sheets or equivalent documentation to determine compliance with this specific condition. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

9. The coating or cleaner usage shall not exceed 876 gallons per 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

ADEQ replaced "defoamer" in 1951-AR-2 S.C.'s 8 and 9 with "coatings or cleaners" in 1951-AR-3, as demonstrated above. Defoamer is not synonymous with coatings or cleaners. It appears that S.C. 8 was specifically set in the original permit to regulate defoamer DF8117 (MSDS attached) since it had 6.52 lbs/gal VOC. S.C. 8 should be deleted since SAF-Holland no longer uses defoamers with VOC. The current defoamer is Globrite 531 (MSDS attached) and has a VOC content of 0.0%.

In addition, SAF-Holland cannot meet the requirements of S.C. 9 as written by limiting "coating or cleaner" usage to 876 gallons. This was also a condition written for DF8117. Since the switch to the 0.0% VOC Globrite 531, usage is approximately 2,000 gallons per year. In addition, SAF-Holland does not wish to confuse the term "coating" with the actual coating operations addressed in S.C.'s 11 through 18.

Therefore, SAF-Holland respectfully requests the removal of S.C. 8 and S.C. 9.

Response 1:

Specific Condition 9 has been removed. Specific Condition 8 shall be revised and remain and read as follows:

“The compounds or components used at SN-02 shall not contain VOC or HAPs. The permittee shall maintain Material Safety Data Sheets or equivalent documentation to determine compliance with this specific condition. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]”

Comment 2:

Page 10, SN-03, SN-04A and SN-04B Conditions

17. The VOC content of the materials used in the painting process at SN-03, SN-04A and SN-04B shall not exceed 2.00 lb/gal. The manufacturer’s MSDS or equivalent shall be maintained onsite to demonstrate compliance with this specific condition. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SAF-Holland can meet this requirement “as applied” because the paint has less than 2.00 lb/gal of VOC. However, SAF-Holland is required to add a solution of 5% ethylene glycol monobutyl ether and 95% water to the coating for viscosity control. Before mixing with water, ethylene glycol monobutyl ether is more than 2.00 lb/gal VOC.

Therefore, it is proposed that S.C. 17 be revised to read as follows, “The VOC content of the materials as applied in the in the painting process at SN-03, SN-04A and SN-04B shall not exceed 2.00 lb/gal....”

Response 2:

The revised condition shall read as follows:

“The VOC content of the materials as applied in the painting process at SN-03, SN-04A, and SN-04B shall not exceed 2.00 lb/gal. The manufacturer’s MSDS or equivalent shall be maintained onsite to demonstrate compliance with this specific condition. The permittee shall also maintain records of additions to the tank and vendor lab tests to ensure compliance with this limit. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]”

Removal of Specific Conditions 9 and 10 will make this Specific Condition 15.

ADEQ MINOR SOURCE AIR PERMIT

Permit No. : 1951-AR-3

IS ISSUED TO:

SAF-Holland USA, Inc.
1103 South Main Street
Dumas, AR 71639
Desha County
AFIN: 21-00079

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

Signed:



Mike Bates
Chief, Air Division

AUG 5 2010

Date

SAF-Holland USA, Inc.
Permit #: 1951-AR-3
AFIN: 21-00079

Table of Contents

Section I: FACILITY INFORMATION	4
Section II: INTRODUCTION.....	5
Summary of Permit Activity	5
Process Description.....	5
Regulations	6
Total Allowable Emissions	6
Section III: PERMIT HISTORY	7
Section IV: EMISSION UNIT INFORMATION.....	8
SN-01 Conditions.....	9
SN-03, SN-04A and SN-04B Conditions	9
Section V: INSIGNIFICANT ACTIVITIES	12
Section VI: GENERAL CONDITIONS	13

SAF-Holland USA, Inc.
Permit #: 1951-AR-3
AFIN: 21-00079

List of Acronyms and Abbreviations

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

SAF-Holland USA, Inc.
Permit #: 1951-AR-3
AFIN: 21-00079

Section I: FACILITY INFORMATION

PERMITTEE: SAF-Holland USA, Inc.

AFIN: 21-00079

PERMIT NUMBER: 1951-AR-3

FACILITY ADDRESS: 1103 South Main Street
Dumas, AR 71639

MAILING ADDRESS: PO Box 825
Dumas, AR 71639

COUNTY: Desha County

CONTACT NAME: Franklin Healey

CONTACT POSITION: Engineering Manager

TELEPHONE NUMBER: 870-382-2299

REVIEWING ENGINEER: Derrick Brown

UTM North South (Y): Zone 15: 3748261.42 m

UTM East West (X): Zone 15: 639992.66 m

SAF-Holland USA, Inc.
Permit #: 1951-AR-3
AFIN: 21-00079

Section II: INTRODUCTION

Summary of Permit Activity

SAF-Holland USA, Inc., located at 1103 South Main Street, Dumas, Arkansas manufacturer's truck suspension systems. This permitting action includes the removal of language referencing two lines, and revision of language to allow the use of coatings or wash solutions other than the alkaline cleaner alone. SN-04B was previously calculated as 10% of the total dip rate, this permit action permits SN-04B at its maximum hour rate. Finally, HAPs have been removed from SN-04A and SN-04B.

Process Description

SAF-Holland USA, Inc. (Holland) produces truck suspension systems. The process consists of fabrication, welding of the metal parts, a spray wash system and dip coating with associated oven drying.

The welding process (SN-01) is gas metal arc welding. There are approximately 80 welding stations at the facility, currently, approximately 25 stations are in operation. There is one (1) coating line. The coating line consists of a spray wash tank (SN-02) with a capacity of 2,600 gallons, two rinse tanks with capacities of 1,800 and 1,000 gallons, an air blow off section, a dip coating tank (SN-03) with a capacity of 3,850 gallons and a drying oven (SN-04A). The current wash material is an alkaline wash, however the facility has used a phosphoric material in the past.

The three washer burners (SN-02) are rated at 2.5, 2.0 and 2.0 MMBtu/hr and the drying oven (SN-04A) is rated at 2.5 MMBtu/hr. The coating conveyor runs at a speed of 8 feet per minute (+/- 2 feet per minute). The production is controlled by the quantity of parts hooked on the line, not the line speed. The dip coating tank is SN-03. There are 48" exhaust fans that operate on the outside wall above the tank.

The drying oven (SN-04A) will emit products of natural gas combustion and evaporation of coating from the parts. Some coating is removed from the dip tank and used for touchup in a repair booth (SN-04B). Overspray is fugitive.

The facility does not have storage tanks that emit regulated pollutants in greater than significant quantities. The propane used at the facility is for the operation of forklifts.

SAF-Holland USA, Inc.
 Permit #: 1951-AR-3
 AFIN: 21-00079

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009

Total Allowable Emissions

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	2.8	6.9
PM ₁₀	2.8	6.9
SO ₂	0.2	0.2
VOC	40.3	93.3
CO	0.9	3.4
NO _x	1.0	4.0
Chromium	0.01	0.01
Cobalt	0.01	0.01
Manganese	0.20	0.40
Nickel	0.01	0.01

SAF-Holland USA, Inc.
Permit #: 1951-AR-3
AFIN: 21-00079

Section III: PERMIT HISTORY

1951-AOP-R0 was the initial permit for this facility. This permit established this facility as a minor source with respect to the *Regulations for Prevention of Significant Deterioration of Air Quality* (PSD, 40 CFR 52.21). VOC emissions were permitted at 147.9 tons per year (beneath the threshold value of 250 ton/yr). A bubble concept was adopted for all dip painting operations (SN-03). Total HAP emissions from this facility were permitted at 60 tons per year.

1951-A was issued to the facility on March 9, 2005. This permit established this facility as a minor source and updated emission estimates.

1951-AR-1 was issued to the facility on April 17, 2007. This permitting action included the installation of 2 paint booths equipped with 2 spray guns.

1951-AR-2 was issued October 11, 2007. This permit action included the removal of Specific Condition #3. SN-04B's location was specified in the permit. Finally, Spray Booth (SN-05) was removed from the permit.

SAF-Holland USA, Inc.
 Permit #: 1951-AR-3
 AFIN: 21-00079

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 19, §19.501 et seq., and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Fabrication Welding	PM ₁₀	2.6	6.5
02	Parts Spray Washing (6.5 MM Btu/hr)	PM ₁₀	0.1	0.3
		SO ₂	0.1	0.1
		VOC	0.8	3.1
		CO	0.6	2.4
		NO _x	0.7	2.9
03	Dip Painting Process	VOC	0.2	90.2*
04A	Drying Oven (2.5 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	25.1	90.2*
		CO	0.3	1.0
		NO _x	0.3	1.1
04B	Touch-Up Painting	VOC	14.4	90.2*

*Bubble for SN-03, SN-04A and SN-04B.

- The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Fabrication Welding	PM	2.6	6.5
		Chromium	0.01	0.01
		Cobalt	0.01	0.01
		Manganese	0.2	0.40
		Nickel	0.01	0.01
02	Parts Spray Washing (6.5 MM Btu/hr)	PM	0.1	0.3
04A	Drying Oven (2.5 MMBtu/hr)	PM	0.1	0.1

SAF-Holland USA, Inc.
Permit #: 1951-AR-3
AFIN: 21-00079

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
02 & 04A	5%	§18.501 & A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-01 Conditions

6. The permittee shall not process more than 2,500,000 pounds of welding wire at the facility per consecutive 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #6. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-02 Conditions

8. The compounds or components used at SN-02 shall not contain VOC or HAPs. The permittee shall maintain Material Safety Data Sheets or equivalent documentation to determine compliance with this specific condition. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-03, SN-04A and SN-04B Conditions

9. The permittee shall maintain a daily log of total finishing hours for SN-04A. The logs may be kept by hand or in electronic format (i.e., computer log sheet), and shall be updated by noon of the following day. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SAF-Holland USA, Inc.
Permit #: 1951-AR-3
AFIN: 21-00079

10. The permittee shall maintain a daily log of total finishing hours for touch-up painting, SN-04B. The logs may be kept by hand or in electronic format (i.e., computer log sheet), and shall be updated by noon of the following day. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
11. The permittee shall keep all coating and solvent containers sealed at all times, except during processing in the paint. A minimal opening, sufficient for the insertion of a process hose in such containers, shall be allowed. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
12. The permittee shall not exceed 25.0 pounds of VOC per hour at SN-04A excluding natural gas combustion emissions. Compliance with this condition shall be demonstrated by item (f) of Specific Condition 16. [Regulation 19, §19.501 et seq. and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The permittee shall not exceed 14.4 pounds of VOC per hour at SN-04B. Compliance with this condition shall be demonstrated by item (f) of Specific Condition 16. [Regulation 19, §19.501 et seq. and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. The permittee shall not exceed 90.1 tons of VOC per consecutive 12-month period at SN-03, SN-04A and SN-04B (combined) excluding natural gas combustion emissions. Compliance with this condition shall be demonstrated by item (g) of Specific Condition 16 and item (g) of Specific Condition 16. [Regulation 19, §19.501 et seq. and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
15. The VOC content of the materials as applied in the painting process at SN-03, SN-04A, and SN-04B shall not exceed 2.00 lb/gal. The manufacturer's MSDS or equivalent shall be maintained onsite to demonstrate compliance with this specific condition. The permittee shall also maintain records of additions to the tank and vendor lab tests to ensure compliance with this limit. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. The permittee shall maintain monthly records of VOC emissions at SN-04A and SN-04B separately. The monthly records shall include the following: [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. Name of each VOC-containing material used at SN-04A and SN-04B.
 - b. Weight in pounds per gallon for each item above.
 - c. Percent by weight of total VOC for each material used at SN-04A and SN-04B, as documented by manufacturer's MSDS sheets or equivalent documentation.
 - d. Amount of each material used at SN-04A and SN-04B on a monthly basis.

SAF-Holland USA, Inc.
Permit #: 1951-AR-3
AFIN: 21-00079

- e. Weight in pounds of total VOC emitted at SN-04A and SN-04B on a monthly basis, using the above described factors.
- f. An average weight in pounds VOC emitted at SN-04A and SN-04B on an hourly basis, using item (e) in conjunction with recorded hours of operation (required by Specific Conditions 10 and 11). A sample equation for calculating average hourly VOC emissions is included in Appendix A of this permit.
- g. A rolling 12-month total of VOC emissions from SN-04A and SN-04B, in ton/yr.

These records may be maintained in either handwritten or electronic (i.e., spreadsheet) format. The records shall be updated by the fifteenth of the month following the recorded month. The records shall be kept on site and made available to Department personnel upon request.

SAF-Holland USA, Inc.
Permit #: 1951-AR-3
AFIN: 21-00079

Section V: INSIGNIFICANT ACTIVITIES

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

Description	Category
Paint Hook Burn-Off Oven	A-13

Section VI: GENERAL CONDITIONS

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

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

SAF-Holland USA, Inc.

Permit #: 1951-AR-3

AFIN: 21-00079

5301 Northshore Drive
North Little Rock, AR 72118-5317

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

SAF-Holland USA, Inc.
Permit #: 1951-AR-3
AFIN: 21-00079

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

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

SAF-Holland USA, Inc.
Permit #: 1951-AR-3
AFIN: 21-00079

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

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

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

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

SAF-Holland USA, Inc.

Permit #: 1951-AR-3

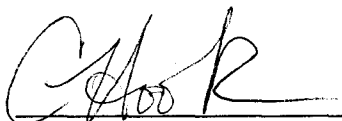
AFIN: 21-00079

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

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

CERTIFICATE OF SERVICE

I, Cynthia Hook, hereby certify that a copy of this permit has been mailed by first class mail to SAF-Holland USA, Inc., PO Box 825, Dumas, AR, 71639, on this 5th day of August, 2010.

A handwritten signature in black ink, appearing to read 'C Hook', written over a horizontal line.

Cynthia Hook, AAI, Air Division