



ARKANSAS
Department of Environmental Quality

OCT 12 2018

Jason Fitts, Plant Manager
Helena Industries, LLC
P. O. Box 2338
West Helena, AR 72390

Dear Mr. Fitts:

The enclosed Permit No. 0277-AR-5 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 5/16/2018.

After considering the facts and requirements of A.C.A. §8-4-101 et seq. as referenced by §8-4-304, and implementing regulations, I have determined that Permit No. 0277-AR-5 for the construction and operation of equipment at Helena Industries, LLC shall 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, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. 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,

A handwritten signature in black ink, appearing to read "Stuart Spencer", is written over a horizontal line.

Stuart Spencer
Associate Director, Office of Air Quality

Enclosure: Final Permit

RESPONSE TO COMMENTS

HELENA INDUSTRIES, LLC PERMIT #0277-AR-5 AFIN: 54-00009

On August 25, 2018, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, written comments on the draft permitting decision were submitted by David A. Weeks, Senior Engineer, RME Safety and Environmental on behalf of the facility. The Department's response to these issues follows.

Note: The following page numbers and condition numbers refer to the draft permit. These references may have changed in the final permit based on changes made during the comment period.

Additions are italicized and underlined. Deletions/removals have been stricken through.

Comment #1:

Section II: Summary of Permit Activity. The permittee requests the third sentence revised to read as follows:

"This modification removes Milling Systems #1, #2, #6, #7, Liquid Area #1, air pollution control equipment (Colag Scrubber and other air pollution control equipment) Granular Area (SN-20), Tank 5 (SN-27), Tank 10 (SN-31), and Tank 13 (SN-34)."

Response to Comment #1:

The above requested change has been made.

Comment #2:

Section II: Summary of Permit Activity. The permittee requests the permitted emission decrease for PM changed from 15.3 to 14.0 tpy.

Response to Comment #2:

The above requested change has been made.

Comment #3:

Section II: Total Allowable Emissions Table. The permittee requests the total allowable emissions for PM changed from 1.2 to 2.5 tpy.

Response to Comment #3:

The above requested change has been made.

Comment #4:

Section IV: Specific Condition 1. The permittee requests the following revisions made to the table in Specific Condition 1.

Comment #6:

Section IV: Specific Condition 8. The permittee requests the first sentence of Specific Condition 8 revised to read as follows:

“The permittee shall maintain monthly records of VOC ~~emissions from the mixing and packing of products~~ containing liquid material throughputs (gal/month) and VOC containing dry material throughputs (tons/month) to demonstrate compliance with Specific Conditions #6 and #7.”

Response to Comment #6:

The above revision has been made as requested.

Comment #6:

Section IV: Specific Condition 10. The permittee requests Specific Condition 10 revised to read as follows:

“The permittee shall not exceed an annual HAP emission rate of ~~2.95~~ 5.75 tons per year for the facility.”

Response to Comment #6:

The above revision has been made as requested.

Comment #6:

Section IV: Specific Condition 11. The permittee requests the first sentence of Specific Condition 11 revised to read as follows:

“The permittee shall maintain monthly records of HAP ~~emissions from the mixing and packing of products~~ containing liquid ingredients (gal/month) and HAP containing dry ingredients (ton/month) to demonstrate compliance with Specific Conditions #9 and #10.”

Response to Comment #6:

The above revision has been made as requested.

ADEQ MINOR SOURCE AIR PERMIT

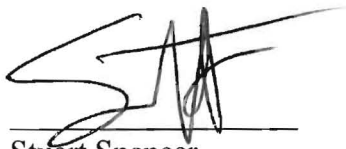
Permit No. : 0277-AR-5

IS ISSUED TO:

Helena Industries, LLC
101 MLK, Jr. Drive (Highway 49)
Helena-West Helena, AR 72390
Phillips County
AFIN: 54-00009

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. § 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



Stuart Spencer
Associate Director, Office of Air Quality

OCT 12 2018

Date

Helena Industries, LLC
Permit #: 0277-AR-5
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Helena Industries, LLC
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List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
C.F.R.	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

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Section I: FACILITY INFORMATION

PERMITTEE:	Helena Industries, LLC
AFIN:	54-00009
PERMIT NUMBER:	0277-AR-5
FACILITY ADDRESS:	101 MLK, Jr. Drive (Highway 49) Helena-West Helena, AR 72390
MAILING ADDRESS:	P. O. Box 2338 West Helena, AR 72390
COUNTY:	Phillips County
CONTACT NAME:	Jason Fltts
CONTACT POSITION:	Plant Manager
TELEPHONE NUMBER:	(870) 575-3434
REVIEWING ENGINEER:	Derrick Brown
UTM North South (Y):	Zone 15: 3825737.89 m
UTM East West (X):	Zone 15: 715140.02 m

Section II: INTRODUCTION

Summary of Permit Activity

Helena Industries, Inc. (AFIN: 54-00009) is a toll manufacturing facility that formulates and packages agricultural chemicals. The facility is located at 101 MLK Jr. Drive (Hwy. 49), West Helena, Arkansas. This modification removes Milling Systems #1, #2, #6, #7, Liquid Area #1, air pollution control equipment (Colag Scrubber and other air pollution control equipment) Granular Area (SN-20), Tank 5 (SN-27), Tank 10 (SN-31), and Tank 13 (SN-34). Also, this modification adds Tank SN-58 (Tank 9), which was installed in 2016. Finally, emissions calculated were updated for many sources. Permitted emissions decreased by 15.6 tpy of PM₁₀, 14.0 tpy of PM, 25.3 tpy of VOC, 15.47 tpy of HAPs, and increased by 2.8 tpy of CO.

Process Description

Helena Industries, LLC. (HIL) is a toll manufacturing facility that formulates and packages agricultural chemicals. The facility receives bulk intermediate or final agricultural chemicals and either packages or custom blends the chemicals to customer specifications.

The Mill Process (Mill 3: SN-03 and Mill 5: SN-02 and SN-04) are dry product formulation processes in which dry ingredients are loaded into a hopper and then mechanically conveyed into a series of three blending units. The materials are then processed through a hammermill before being pneumatically conveyed to a product dust collector (which serves as a separation process), with particulate emissions routed to a main dust collector prior to packaging.

Liquid products are processed in the Main Liquid Plant ([Liquid Area I: SN-09 (formulation process area), and pack lines (SN-10, SN-11, SN-12, and SN-13)] or in other satellite locations such as (Liquid Area II: SN-52, SN-53, SN-54, and SN-07), [Liquid Area III: SN-08 (which includes the carbon absorber, packaging line, and two final product holding tanks), and SN-55 (a mix tank)], or [Liquid Area V: SN-14 (which includes a surge tank and filling machine), and SN-56 (which includes a carbon filter, 4 processing tanks, and a mini-bulk fill station)]. The natural gas-fired boiler system (8.4 MM Btu/hr) is used as a heat source during product formulation in Liquid Area I.

Tank Farm #1 (SN-36-51) and Tank Farm #2 (SN-23-26, SN-28-30, SN-32, SN-33, SN-35, SN-58) are used to store bulk finished products and raw materials.

The Dry Pack Process Area which includes [Mill 4 (SN-15), and Dry Pack Bays 2, 3, and 4 (SN-16, SN-17, SN-18)] receives bulk containers of final product and packages the product into smaller containers through a series of hoppers.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective March 14, 2016
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective March 14, 2016

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	1.8	2.5
PM ₁₀	0.7	0.9
SO ₂	0.1	0.1
VOC	17.7	6.5
CO	0.7	3.1
NO _x	0.3	1.2
Total HAP	6.62	5.75

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Section III: PERMIT HISTORY

Permit #0277-AR-3 was issued on January 23, 2006. This modification transferred ownership of the air permit from Helena Chemical Company to Helena Industries, Inc.

Permit #0277-AR-4 was issued February 6, 2015. This modification incorporated two changes: (1) The Mill3 process was changed by disconnecting it from the common bag/cartridge filter located outside the Mill3 building and connecting it to two new bag/cartridge filter systems that were constructed inside the building. The Liquid 5 process was changed by constructing a filling room inside the existing building to collect emissions from the filling process and then treating the emissions in a new carbon adsorption system. In addition, Helena Industries permitted a 250-gal gasoline storage tank to provide fuel for plant equipment. Total emission changes were - 1.3 tpy of PM/PM₁₀ and 1.1 tpy of VOC.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.19.501 *et seq.* and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
03	Milling System 3 (Mill 3)	PM ₁₀ VOC	0.1 0.1	0.1 0.1
02, 04	Milling System 5 (Mill 5)	PM ₁₀ VOC	0.1 0.1	0.2 0.2
08, 55	Liquid Area III (LA3); LA3 Mix Tank and Pack Line Process Area	VOC	0.2	0.2
09, 10, 11, 12, 13	Liquid Area I (LAI); LAI Formulation and Pack Line Process Area	PM ₁₀ VOC	0.1 6.7	0.1 2.1
14, 56	Liquid Area 5 (LA5); LA5 Fill Room and Process Area	VOC	0.4	0.2
07, 52, 53, 54	Liquid Area II (LA2) Packaging Line, Mix Tank, Pack Tank, and Bulk Tank	VOC	6.7	2.1
15, 16, 17, 18	Dry Pack Bays (Mill 4, and Bays 2,3, &4)	PM ₁₀ VOC	0.1 0.1	0.1 0.2
23-26, 28-30, 32, 33, 35, 58	Tank Farm #2 (Tanks 1-4, 6-9, 11, 12, & 14)	VOC	2.7	0.8
36-51	Tank Farm #1 (Tanks 15-30)	VOC	0.4	0.2
21	Waste Building	PM ₁₀ VOC	0.2 0.1	0.1 0.1
22	Boiler Process	PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.7 0.3	0.3 0.1 0.2 3.1 1.2
57	Gasoline Storage Tank	VOC	0.1	0.1

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2. The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
03	Milling System 3 (Mill 3)	PM	0.1	0.1
02, 04	Milling System 5 (Mill 5)	PM	1.0	1.5
09, 10, 11, 12, 13	Liquid Area I (LA1); LA1 Formulation and Pack Line Process Areas	PM HAPs	0.1 2.73	0.1 2.85
14, 56	Liquid Area 5 (LA5); LA5 Fill Room and Process Area	HAPs	0.01	0.01
07, 52, 53, 54	Liquid Area II (LA2) Packaging Line, Mix Tank, Pack Tank, and Bulk Tank	HAPs	2.73	2.85
15, 16, 17, 18	Dry Pack Bays (Mill 4, and Bays 2,3, &4)	PM	0.1	0.4
36-51	Tank Farm #1 (Tanks 15-30)	HAPs	1.11	0.01
21	Waste Building	PM HAPs	0.2 0.04	0.1 0.03
22	Boiler Process	PM	0.1	0.3

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

SN	Limit	Regulatory Citation
Facility	10%	Reg.18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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 Ark. Code Ann. § 8-4-303. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.18.901 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

6. The permittee shall not exceed the following at the facility:

Process Area	Material Throughput	
	VOC Containing Liquid (Gallons/year)	Dry Material (Tons/Year)
Mill3		26,280
Mill5		10,000
Liquid Area 3	1,350,000	
Liquid Area 1	9,330,000	4,794
Liquid Area 5	1,718,496	
Liquid Area 2	9,330,000	
Dry Pack Area		5,000
Tank Farm 2	11,950,000	
Tank Farm1	11,000,000	

[Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

7. The permittee shall not exceed an annual VOC emission rate of 6.5 tons per year for the facility. [Reg.19.501 *et seq.* and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall maintain monthly records of VOC containing liquid material throughputs (gal/month) and VOC containing dry material throughputs (tons/month) to demonstrate compliance with Specific Conditions #6 and #7. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Department personnel upon request.
 [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
9. The permittee shall not exceed the following at the facility:

Product Type	Material Throughput	
	Gallons/Year	Tons/Year
HAP Containing Liquid Ingredient Mixed and Loaded Out	13,558,730	
HAP Containing Solid Ingredient Mixed and Loaded Out		4,794

[Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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10. The permittee shall not exceed an annual HAP emission rate of 5.75 tons per year for the facility. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
11. The permittee shall maintain monthly records of HAP containing liquid ingredients (gal/month) and HAP containing dry ingredients (ton/month) to demonstrate compliance with Specific Conditions #9 and #10. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Department personnel upon request. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
12. The permittee shall burn only natural gas at the SN-22, 8.4 MM Btu/hr boiler. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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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 Regulation 19 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated May 14, 2018. [Reg.19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
N/A	

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 (Ark. Code Ann. § 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 (Ark. Code Ann. § 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 (Ark. Code Ann. § 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. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after each of the following events: 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. [Reg.19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Reg.19.410(B) and/or Reg.18.309(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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

Helena Industries, LLC

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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) business days in advance of such test. The permittee must submit compliance test results to the Department within sixty (60) calendar days after the completion of testing. [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall provide: [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.303 and/or Reg.18.1104 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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: [Reg.19.601 and/or Reg.18.1101 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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

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: [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.410(A) and/or Reg.18.309(A) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.407(B) and/or Reg.18.307(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 16. This permit authorizes only those pollutant emitting activities addressed herein. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 17. This permit supersedes and voids all previously issued air permits for this facility. [Reg. 18 and/or Reg. 19 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 18. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [Ark. Code Ann. § 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.
- [Reg.18.314(A) and/or Reg.19.416(A), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 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 facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
 - a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;
 - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
 - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
 - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Reg.18.314(B) and/or Reg.19.416(B), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

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.

[Reg.18.314(C) and/or Reg.19.416(C), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

22. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [Reg.18.1001, Reg.19.701, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 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 Helena Industries, LLC, P. O. Box 2338, West Helena, AR, 72390, on this 12th day of October, 2018.

C. Hook

Cynthia Hook, ASIII, Office of Air Quality