



ARKANSAS

ENERGY & ENVIRONMENT

August 1, 2022

Via email to: fittsj@helenaindustries.com
GriffinM@helenaindustries.com & First Class Mail

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

Re: Notice of Final Permitting Decision; Permit No. 0277-AR-6

Dear Mr. Fitts,

After considering the application and other applicable materials as required by APC&EC Rule 8.211 and Ark. Code Ann. § 8-4-101 *et seq.*, this notice of final permitting decision is provided for:

Helena Industries, LLC
101 MLK, Jr. Drive (Highway 49)
Helena-West Helena, AR 72390

Permit Number: 0277-AR-6

Permitting Decision: approval with permit conditions as set forth in final Permit No. 0277-AR-6

Accessing the Permitting Decision:
<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/0277-AR-6.pdf>.

Accessing the Statement of Basis:
<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/0277-AR-6-SOB.pdf>.

Rule 19.407(A) of the Arkansas Plan of Implementation for Air Pollution Control (SIP) and Rule 18.307(A) of the Arkansas Air Pollution Control Code do not require a public notice or public comment period for Administrative Amendments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Daw', followed by a long horizontal stroke.

David Witherow, P.E.

Associate Director, Office of Air Quality, Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure: Certificate of Service

cc: dawees@rmese.com

CERTIFICATE OF SERVICE

I, Natasha Oates, hereby certify that the final permit decision notice has been mailed by first class mail to Helena Industries, LLC, P. O. Box 2338, West Helena, AR, 72390, on this 1st day of August, 2022.



Natasha Oates, AA, Office of Air Quality



DIVISION OF ENVIRONMENTAL QUALITY

MINOR SOURCE AIR PERMIT

PERMIT NUMBER: 0277-AR-6

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 DIVISION OF ENVIRONMENTAL QUALITY'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 RULES PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

A handwritten signature in blue ink, appearing to read "Dau", followed by a horizontal line.

David Witherow, P.E.
Associate Director, Office of Air Quality
Division of Environmental Quality

August 1, 2022

Date

Helena Industries, LLC
Permit #: 0277-AR-6
AFIN: 54-00009

Table of Contents

Section I: FACILITY INFORMATION.....	4
Section II: INTRODUCTION.....	5
Summary of Permit Activity.....	5
Process Description.....	5
Rules and Regulations.....	9
Total Allowable Emissions.....	10
Section III: PERMIT HISTORY	11
Section IV: EMISSION UNIT INFORMATION.....	12
Section V: INSIGNIFICANT ACTIVITIES	16
Section VI: GENERAL CONDITIONS	17
Appendix A: 40 C.F.R. § 63, Subpart CCCCCC – <i>Gasoline Dispensing Facilities</i>	

Helena Industries, LLC
Permit #: 0277-AR-6
AFIN: 54-00009

List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	Arkansas DEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
HAP	Hazardous Air Pollutant
Hp	Horsepower
lb/hr	Pound Per Hour
NESHAP	National Emission Standards (for) Hazardous Air Pollutants
No.	Number
NO _x	Nitrogen Oxide
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate Matter Equal To Or Smaller Than Ten Microns
PM _{2.5}	Particulate Matter Equal To Or Smaller Than 2.5 Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Helena Industries, LLC
Permit #: 0277-AR-6
AFIN: 54-00009

Section I: FACILITY INFORMATION

PERMITTEE:	Helena Industries, LLC
AFIN:	54-00009
PERMIT NUMBER:	0277-AR-6
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 Fitts
CONTACT POSITION:	Plant Manager
TELEPHONE NUMBER:	(870) 575-3434
REVIEWING ENGINEER:	Sarah Neoh
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 receives bulk intermediate or final agricultural chemicals and either packages or custom blends the chemicals to customer specifications. The facility is located at 101 MLK Jr. Drive (Hwy. 49), West Helena, Arkansas. This modification involves the following:

- Increasing the max batch sizes of all the mix tank and pack tanks (total of 5 each) from 5,000-gallon to 5,700-gallon for the formulation of liquid products in the Liquid Area I Process Area.
- Reflecting the separation, addition, and reorganization of equipment in the Liquid Area III Process Area. This equipment addition results in particulate matter (PM) emissions in a process area that does not include particulate emission limits in the Existing Permit. Similarly, HI desires to increase the permit throughput limit of VOC containing liquids to a total of 3,550,000 gallons/year.
- Reflecting the use of Tank 15 (SN36) in Tank Farm #1.
- Installing a 20,000-gallon storage tank; Tank 13 (SN34) in Tank Farm #2.
- Installing a 1,000-gallon propane tank for on-site cylinder filling for use in forklifts.
- Adding a new HAP category (Isophorene) for product 71.
- Increasing the amount of supersack waste that is processed due to the addition of a new product profile in LAIII that includes the addition of dry material from supersacks.
- Increasing the particulate emissions limit in the Waste Building as a result of supersack processing.
- Removing the gasoline storage tank (SN-57) and its emission limits.

This modification results in increases in permitted emissions by 0.8 tpy PM, 0.2 tpy PM₁₀, 1.1 tpy VOC., and 2.25 tpy HAPs.

This modification does not affect Mill 3, Mill 5, Liquid Area 5, Liquid Area 2, Dry Pack Bays (Mill 4, and Bays 2, 3, and 4), or the boiler process.

Process Description

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.

Helena Industries, LLC
Permit #: 0277-AR-6
AFIN: 54-00009

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 and packaging line), 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.

The process description detailed in the following subheadings is specific to the permit activity described in the bullet points above. All other processes not discussed in the subheading below remain unchanged and are not affected by the current permitting action.

2.1 Liquid Area I Process Area

2.1.1 Liquid Area I Formulation Area (SN09)

In the Existing Permit the Liquid Area I Formulation Process is a liquid materials formulation process in which liquid ingredients are transferred from either Tank Farm #1 Tanks or bulk containers into one of five 5,700-gallon mix tanks. The mix tanks are set on scales and have mechanical agitators mounted on the tops of the tanks. The ingredients are blended in the mix tanks until the product meets specifications and then is transferred to one of five 5,700-gallon holding tanks (i.e. pack tanks). The products are then conveyed to the Liquid Area I Pack Line Process Area for consumer packaging and distribution.

2.1.2 Liquid Area I Pack Line Process Area (SN10, SN11, SN12, and SN13)

In the Existing Permit any single Pack Line or combination of Pack Lines in the Liquid Area I Pack Line Process Area can be activated for filling operations depending on HIL customer demands. There have been no changes to this process area except that Pack Line 1 (one of the two Pack Lines that makes up SN10) is not currently being used, but may be used in the future.

2.2 Liquid Area III Process Area

The Existing Permit was prepared for a liquid material repackaging process that consisted of Mix Tank III (SN55) which functioned as a bulk receiving vessel, two 2,500-gallon final product holding tanks, a packaging line, and a carbon absorption system. Mix Tank III (SN55) was used solely for agitating final product before it was transferred to one of the two 2,500-gallon holding tanks prior to being transferred to the packaging line. However, due to new product demand, HIL has made several modifications to this process area that includes separating, adding, and reorganizing equipment. As a result, there are now two separate process areas within Liquid Area

III Process Area: the Formulation Area and the Repack Area.

2.2.1 Formulation Area

Mix Tank III (SN55) was replaced with a 7,500-gallon formulation tank (SN59). An outdoor cargo truck load-in station, a 7,500-gallon holding tank (SN60), and a totally enclosed screw auger (SN61) were added to the process area. The formulation area consists of a liquid materials formulation process that includes blending liquid and solid materials in the new 7,500-gallon formulation tank (SN59), transferring the final product to the holding tank (SN60), and packaging the final product into bulk containers or into smaller containers via the existing packaging line. The carbon absorption system (SN08) is still present in the Formulation Area and has a 99.97% VOC removal efficiency.

2.2.2 Repack Area

The Repack Area consists of a liquid material repackaging process that consists of one of the two 2,500-gallon final product holding tanks (SN62). The second 2,500-gallon product holding tank that was located in Liquid Area III is not currently in use, but may be used in the future. Liquid final products are transferred from bulk containers into the final product holding tank before being repacked into smaller containers by means of gravity flow.

2.3 Tank Farm #1 Process Area (SN36 – SN51)

The tanks in Tank Farm #1 are used to store ingredients, formulate bulk product, and store bulk finished product. Materials are transferred from Tank Farm #1 through a series of piping to various Liquid Areas for formulation and packaging.

Today, the Tank Farm #1 Process Area consists of the same equipment that was present when the Existing Permit was issued (i.e., Tanks 15 – 30). Tank 15 (SN36) is being used for storage and transfer purposes. The tank is used as a swing tank to allow the facility to process an ingredient profile that fits one of the bulk ingredient categories in Tank Farm #2. In other words, the ingredient storage contents may vary over the course of the year.

The emissions calculations for Tank Farm #1 did not change from those that were prepared in support of the Existing Permit because the calculations are based on the processing of ingredients and bulk products through the tank farm in total. This approach was taken because of the number of ingredients and products that are transferred through the tanks and because the tanks are not dedicated to any one specific product or ingredient. The total quantity of material processed through the tank farm will remain limited. HIL requests to retain the existing permit limits for Tank Farm #1.

2.4 Tank Farm #2 Process Area

The Tank Farm #2 Process stores ingredients and bulk finished products. Materials are transferred through a series of piping to various Liquid Areas for formulation and packaging.

Today, the Tank Farm #2 Process Area consists of the same equipment that was present when the Existing Permit was issued (i.e. Tanks 1 – 4; 6 – 9; and 11, 12, and 14). The only change that

has occurred to Tank Farm #2 Process Area has been the addition of Tank 13 (SN34) for storage and transfer purposes. Tank 13 is a 20,000-gallon storage tank that is used as a swing tank to allow the facility to process an ingredient profile that fits one of the bulk ingredient categories in Tank Farm #2. In other words, the ingredient storage contents may vary over the course of the year.

Similar to Tank Farm #1, the emission calculations for Tank Farm #2 did not change from those that were prepared in support of the Existing Permit because the products and ingredients stored in any individual tank can change in the course of any given year, but the total quantity of material processed through the tank farm will remain limited. HIL requests to retain the existing permit limits for Tank Farm #2.

2.5 New Product Variations

HI anticipates that there will be an increase in the product variations from 61 products to a total of 73 products. The new products were evaluated applying the same methods that were established when the permit was modified in 2018 which established the permit conditions in the Existing Permit. Table 1 summarizes that evaluation:

TABLE 1: NEW PRODUCT EVALUATION

HI Product No.	Anticipated Production Area	Anticipated Packaging Area	Anticipated Throughput (gal)	Dry Addition (Y/N)	VOC Category ¹	HAP Categories
62	LAI	LAI Pack Line	514,500	Yes	Urea/Elemental Solutions	•Formaldehyde •Manganese Compounds •Cobalt
63	LAI	LAI Pack Line	10,000	Yes	Urea/Elemental Solutions	•Formaldehyde
64	LAI	LAI Pack Line	120,000	Yes	Urea/Elemental Solutions	•Manganese Compounds •Cobalt
68	LAI	LAI Pack Line	100,000	Yes	Urea/Elemental Solutions	•Manganese Compounds
67	LAI	LAI Pack Line	100,000	No	Organic Acids	•Ethylene glycol •Glycol Ethers
73	LAI	LAI Pack Line	12,000	No	Surfactant	•Ethylene oxide
65	LAIH Formulation Area	LAIH Pack Line	451,500	Yes	Pesticides	•Not Applicable
66	LAIH Formulation Area	LAIH Pack Line	688,000	No	Pesticides (Repacked Only)	•Not Applicable
69	LAIH Formulation Area	LAIH Pack Line	129,000	No	Urea/Elemental Solutions (Repacked Only)	•Not Applicable

70	LAIII Formulation Area	LAIII Pack Line	709,500	No	Ammonium Acetate Solution (Repacked Only)	•Not Applicable
71	LAIII Repack Area	LAIII Repack Area	172,000	No	Pesticide (Repacked Only)	•Isophorone
72	Tank Farm #1	LAI Pack Line	12,000	No	Oil and Mineral Spirits	•Diethanolamine •Ethylene glycol

***NOTE:**

1. Repacked Only Chemical Categories include products that are not formulated (i.e. no ingredient addition) at the Facility. They are delivered in bulk, stored in bulk, and repacked into smaller containers.
2. Product 62 includes the addition of dry material in the formulation.

Additionally, HI has changed the location where one of the original 61 products is processed at this facility. Product 51 which belongs to the VOC – Organic Acids Category was formulated in LAI and is now formulated in LAIII. The anticipated throughput of Product 51 is equal to 50,000-gallons.

2.6 Waste Preparation Building Process (SN21)

The Waste Preparation Building Process consists of the same equipment that was present when the Existing Permit was issued. HIL anticipates that the amount of supersack waste that is processed will increase due to the proposed new product addition in LAIII that includes a dry material component (See Table 1) in Section 2.5.

2.7 Propane Storage and Handling

HIL installed a 1,000-gallon propane vessel that is used for filling cylinders that are used to operate the forklifts. HIL requests that the propane storage and handling equipment is characterized as an insignificant activity and that it is not included as a permitted source. The propane storage and handling equipment qualifies for Item 1 on the Group B Insignificant Activity List because this activity results in combustion emissions from propulsion of mobile sources and emissions from refueling these sources. This activity is not regulated by Title II or any other federal requirement.

Emission calculations to demonstrate compliance with this insignificant activity are not required.

2.8 Gasoline Storage Tank (SN57)

HIL no longer uses the gasoline storage tank. The storage tank is still on-site, however, it has been disconnected from all sources of energy, filled with sand, and marked out of service. HIL requests to remove all limits and conditions related to the gasoline storage tank from the permit.

Rules and Regulations

The following table contains the rules and regulations applicable to this permit.

Rules and Regulations

Helena Industries, LLC
Permit #: 0277-AR-6
AFIN: 54-00009

Arkansas Air Pollution Control Code, Rule 18, effective March 14, 2016
Rules of the Arkansas Plan of Implementation for Air Pollution Control, Rule 19, effective August 6, 2020

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	6.5	3.3
PM ₁₀	1.3	1.1
PM _{2.5}	See Note*	
SO ₂	0.1	0.1
VOC	23.2	7.5
CO	0.7	3.1
NO _x	0.3	1.2
Total HAP	7.32	8.00

*PM_{2.5} limits are source specific, if required. Not all sources have PM_{2.5} limits.

Helena Industries, LLC
Permit #: 0277-AR-6
AFIN: 54-00009

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.

Permit #0277-AR-5 was issued October 12, 2018. This modification removed Milling Systems #1 (SN01), #2 (other than dust collector SN05 that was rerouted to collect particulate emissions from Milling System #5), #6 (SN05), #7 (SN06); Liquid Area #1 air pollution control equipment (Colag Scrubber and other air pollution control equipment used for pack lines); Dry Pack Bay 5 (SN19); Granular Area (SN-20); Tank 5 (SN-27), Tank 10 (SN-31), and Tank 13 (SN-34) in Tank Farm #2. This modification also added Tank SN-58 (Tank 9) to Tank Farm #2, which was installed in 2016. Finally, emissions calculated were updated for many sources to account for other process changes, including changes to chemical inventories, and to revise methods of calculation for some sources to be consistent and to reflect the changes to chemical inventories. 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.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. [Rule 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	0.1	0.1
		VOC	0.1	0.1
02, 04	Milling System 5 (Mill 5)	PM ₁₀	0.1	0.2
		VOC	0.1	0.2
08, 59-62	Liquid Area III (LA3) Formulation Area; LA3 Repack Area	PM ₁₀	0.6	0.1
		VOC	5.4	1.1
09-13	Liquid Area I (LAI); LAI Pack Line Process Area	PM ₁₀	0.1	0.1
		VOC	7.1	2.3
14, 56	Liquid Area 5 (LA5); LA5 Fill Room and Process Area	VOC	0.4	0.2
07, 52-54	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	0.1	0.1
		VOC	0.1	0.2
23-26, 28-30, 32, 33, 34, 35, 58	Tank Farm #2 (Tanks 1-4, 6-9, 11, 12, 13, & 14)	VOC	2.7	0.8
36 - 51	Tank Farm #1 (Tanks 15 - 30)	VOC	0.4	0.2
21	Waste Building	PM ₁₀	0.2	0.2
		VOC	0.1	0.1
22	Boiler Process	PM ₁₀	0.1	0.3
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.7	3.1
		NO _x	0.3	1.2

2. The permittee shall not exceed the emission rates set forth in the following table. [Rule 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
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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
08, 59-62	Liquid Area III (LA3) Formulation Area; LA3 Repack Area	PM HAPs	4.7 0.69	0.7 2.25
09-13	Liquid Area I (LAI); LAI Pack Line Process Area	PM HAPs	0.1 2.72	0.1 2.84
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	1.13	0.01
21	Waste Building	PM HAPs	0.2 0.04	0.2 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 Rule 18, if the emission of the air contaminant constitutes air pollution within the meaning of Ark. Code Ann. § 8-4-303. [Rule 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. [Rule 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	3,550,000	3,328
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 7.6 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	15,490,227	
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]

10. The permittee shall not exceed an annual HAP emission rate of 8 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]

Helena Industries, LLC

Permit #: 0277-AR-6

AFIN: 54-00009

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]

Helena Industries, LLC
Permit #: 0277-AR-6
AFIN: 54-00009

Section V: INSIGNIFICANT ACTIVITIES

The Division of Environmental Quality 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 Rule 18 and Rule 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 February 14, 2022. [Rule 19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
Combustion emissions from propulsion of mobile sources and emissions from refueling these sources (Installation of 1,000-gallon propane tank for on-site cylinder filling for use in forklifts)	B-1

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Rule 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 Rule 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 Rule 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 rules 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 Division of Environmental Quality 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. [Rule 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. [Rule 19.410(B) and/or Rule 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 Division of Environmental Quality to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Division of Environmental Quality may use the records, at the discretion of the Division of Environmental Quality, to determine compliance with the conditions of the permit. [Rule 19.705 and/or Rule 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 Division of Environmental Quality electronically using <https://eportal.adeq.state.ar.us> or mail them to the address below. [Rule 19.705 and/or Rule 18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Division of Environmental Quality
Office of Air Quality

Helena Industries, LLC
Permit #: 0277-AR-6
AFIN: 54-00009

ATTN: Compliance Inspector Supervisor
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 Division of Environmental Quality. The permittee must notify the Division of Environmental Quality 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 Division of Environmental Quality within sixty (60) calendar days after the completion of testing. [Rule 19.702 and/or Rule 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: [Rule 19.702 and/or Rule 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. [Rule 19.303 and/or Rule 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 Division of Environmental Quality may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Rule 19.601 and/or Rule 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 Division of Environmental Quality 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, overnight delivery, or online at <https://eportal.adeq.state.ar.us>) to the Division of Environmental Quality by the

- end of the next business day after the occurrence or the discovery of the occurrence.
- c. The permittee must submit to the Division of Environmental Quality, 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 Division of Environmental Quality 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 Division of Environmental Quality issued this permit in reliance upon the statements and presentations made in the permit application. The Division of Environmental Quality 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 Division of Environmental Quality may revoke or modify this permit when, in the judgment of the Division of Environmental Quality, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the rules promulgated the Arkansas Water and Air Pollution Control Act. [Rule 19.410(A) and/or Rule 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 Division of Environmental Quality 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 Division of Environmental Quality denies the request to transfer within thirty (30) days of the receipt of the

disclosure statement. The Division of Environmental Quality 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. [Rule 19.407(B) and/or Rule 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. [Rule 18 and/or Rule 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 Rule 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 Division of Environmental Quality approval. The Division of Environmental Quality 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.

[Rule 18.314(A) and/or Rule 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 Division of Environmental Quality approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Division of Environmental Quality 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 Division of Environmental Quality 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.

[Rule 18.314(B) and/or Rule 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 Division of Environmental Quality approval. The Division of Environmental Quality 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.

[Rule 18.314(C) and/or Rule 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. [Rule 18.1001, Rule 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]