

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 0401-AR-13

IS ISSUED TO:

Epoxyn Products
500 East 16th Street
Mountain Home, AR 72653
Baxter County
AFIN: 03-00027

THIS PERMIT IS YOUR 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 YOUR 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:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE: Epoxyn Products
AFIN: 03-00027
PERMIT NUMBER: 0401-AR-13

FACILITY ADDRESS: 500 East 16th Street
Mountain Home, AR 72653

COUNTY: Baxter County

CONTACT POSITION: Ron Svoboda – Technical Services Manager
TELEPHONE NUMBER: (870) 425-4321 ext. 1823

REVIEWING ENGINEER: Siew Low

UTM North-South (X): 4019 km [Zone 15]
UTM East-West (Y): 556 km [Zone 15]

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SECTION II: INTRODUCTION

Summary

Epoxyn Products operates a facility which manufactures laboratory countertops in Mountain Home, Arkansas. This air permit is authorizing the facility to install and operate a new Thermal Curing Unit (SN-29). The new Thermal Curing Unit utilizes a Mobil-Therm oil electric heating system, and is positioned to use the existing permitted vent hoods SN-05 and SN-07. No increase in the previous permitted emission levels will occur as a result of this installation.

Process Description

Manufacture of Epoxyn Countertops; Receiving and Curing

The principal product manufactured at Epoxyn Products is laboratory countertop material made from thermosetting epoxy resin, an anhydride curing agent, and inert filler. The epoxy resins are received by bulk truck and stored in four storage tanks. The ground silica sand filler is also received by bulk truck and pneumatically conveyed into a silo equipped with a baghouse (SN-15).

These materials are then transferred to a mixing vessel and blended at 320EF for several hours. The transferring and mixing operations are sealed systems. This "premix" material (about 90% of the final mixture) is then weighed into a small pouring vessel where it is mixed with colored pigments, hardener, and catalyst. Phthalic Anhydride is the hardener used in the process. Phthalic Anhydride is a solid at room temperature, so it must be handled at 310EF. The melt tank and transfer systems are sealed. After thoroughly blending all of the ingredients, the material is poured into large open molds which are held inside ovens at 350EF until the castings are cured. There are five ovens. The largest oven is identified as oven #1 and its hot gas exhaust point source is SN-01. It has two cool air venting hoods on either side of the oven identified as SN-02 and SN-03, and a floor vent identified as SN-08. These three sources have been "bubbled" in the emissions table. The medium sized oven's hot gas exhaust is SN-04. It has two ventilation cool air exhausts identified as SN-05 and SN-07, which have also been "bubbled." There are two small ovens identified as oven #3 (SN-10) and oven #4 (SN-11). They share one ventilation cool air exhaust hood (SN-12). The Thermal Curing Unit (SN-29) utilizes a Mobil-Therm oil electric heating system, and is positioned to use the existing vent hoods SN-05 and SN-07. During the curing cycle, some of the unreacted monomers are vaporized from the casting and exhausted with the oven gases.

The steam used to transfer heat to the production vessels is generated by two gas fired boilers (SN-16 and SN-17) located in a separate building on the east side of the main building.

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Fabrication

Fabrication operations involve cutting, trimming, smoothing, and touch-up operations. After curing is completed, the product is removed from the molds and allowed to cool before fabrication and packaging for shipment. Two Hoffman vacuum air filtration systems are used to collect dust created by the fabricating operations. The 60 H.P. unit is identified as SN-13 and the 75 H.P. unit is SN-14. They are both located outside and at the rear of the main building. A spray booth is also used in the fabrication area, where touch-up work is occasionally done using small cans of spray paint. The spray paint is the source of Toluene, a HAP, and hourly emission rates have been estimated at less than 4.0 lb/hr. A panel saw located in this area is used for slabs of silica sand material. Emissions from the panel saw are captured by a baghouse (SN-28) located outside and exhausted to the atmosphere.

Miscellaneous Operations

Other miscellaneous operations associated with the manufacturing process are conducted. The molds are resurfaced by blasting with glass beads. The air separator for the blasting machine is identified as SN-20. The device vents horizontally. A gas fired heat-cleaning oven with an afterburner as a control equipment is used to burn out hardened material from containers used in the mold pouring operations (SN-22).

Several solvent cleaning operations are conducted as described below. Wire screens are used to filter the hot material as it is being poured. The solvent used to clean these screens is Ethyl 3-ethoxypropionate (EEP). This solvent has a low vapor pressure and, based on recent mass balance calculations, little EEP is emitted as air emissions. Wipe cleaning operations are performed using VM&P Naphtha and Isopropyl Alcohol. Small parts cleaning is done in the maintenance area in a parts washer with mineral spirits. Collectively, all of these miscellaneous sources are referred to as SN-23. In the laboratory, two laboratory hoods, identified as SN-18 and SN-19, are used for quality control and some R&D.

Emissions and Regulations

Data submitted on November 25, 1997, based on Phthalic Anhydride emissions from laboratory castings measured by ENVIRON, show that the plant can operate at its maximum physical capacity with all individual HAPs emitted below the Title V threshold. Consequently, throughput limits for raw materials have been set at the production capacity of the plant.

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Regulations

The facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Regulation 18), and the *Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19).

The following table is a summary of the facility's total emissions.

| TOTAL ALLOWABLE EMISSIONS | | |
|---------------------------|----------------|------|
| Pollutant | Emission Rates | |
| | lb/hr | tpy |
| PM | 8.3 | 31.8 |
| PM ₁₀ | 8.3 | 31.8 |
| SO ₂ | 0.7 | 2.5 |
| VOC | 15.2 | 65.0 |
| CO | 1.0 | 4.3 |
| NO _x | 3.8 | 15.9 |
| Phthalic Anhydride* | 2.4 | 7.9 |
| Toluene* | 3.5 | 3.5 |
| Xylene* | 1.3 | 3.9 |
| Total HAP | 7.2 | 15.3 |

* Indicates Hazardous Air Pollutant (HAP)

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SECTION III: PERMIT HISTORY

- 401-A On November 16, 1979, the first air permit was issued to the facility. Air permit #401-A permitted the construction , operation, and/or maintenance of equipment and/or facility in the manner as set forth in the Commission's Summary Report.
- 401-AR-1 Couldn't find record of this permit.
- 401-AR-2 This permit was issued on August 01, 1986. This permit modification served as the means to establish emission limits for previously permitted sources and to recognize the addition of a third oven.
- 401-AR-3 This permit was issued on April 23, 1990. This modification increased the amount of 1, 1, 1 trichloroethane from 2 lbs/hr to 3.3 lbs/hr. Also, SN-06 was removed from service.
- 401-AR-4 This permit was issued on September 09, 1991. This modification increased the amount of 1, 1, 1 trichloroethane from 3.3 lbs/hr to 4.8 lbs/hr and the amount of Phthalic Anhydride from 2.2 lbs/hr to 3.96 lb/hr.
- 401-AR-5 This permit was issued on January 21, 1992. Epoxyn proposed to add two housekeeping central vacuum cleaning systems for dust control in the fabrication and finishing department.
- 401-AR-6 This permit was issued on September 20, 1994. This modification noted that Epoxyn discontinued use of 1, 1, 1 trichloroethane, a solvent used as a carrier and in cleaning operations, in all processes at the facility. This permitting action reduced permitted emissions of 1, 1, 1, trichloroethane by 21.5 tons per year. The melt tank was changed to a closed system which does not vent to atmosphere.
- 401-AR-7 This permit was issued on April 12, 1996. This modification addressed the following changes:
1. To add existing boilers that were not previously permitted (SN-16 and SN-17).
 2. To add some other minor sources to the permit (SNS 20 through 23).
 3. To account for off site disposal of some of the ethyl 3-ethoxypropionate (EEP) which is a solvent that is used at the facility.
 4. To recalculate emission of phthalic anhydride based on laboratory testing.
 5. The Table I was adjusted for the new sources and the new emission rates from the existing point sources.
 6. Previous Specific Conditions 1, 2, and 3 were combined into new Specific Condition #1.

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7. Previous Specific Conditions 4 through 9 were combined into new Specific Condition #5.

- 401-AR-8 This permit was issued on July 25, 1997. Epoxyn Products proposed to :
1. Change compliance monitoring from monthly epoxy composition throughput limits to a 12 month rolling total.
 2. Increase total silica usage by about 5%.
 3. Update the responsible individuals on the Certification Page.
- 401-AR-9 This permit was issued on February 26, 1999. Epoxyn Products had modified its resin formulation and conducted laboratory test for the actual emission rate, as a percentage of total cast material, of Phthalic Anhydride, the principle HAP in their process. Data submitted shows that increasing the polymerization rate significantly reduces the loss of volatile material during the curing process. The facility also installed two thermal curing units (SN-24 and SN-25).
- 401-AR-10 This permit was issued on March 9, 2000 to incorporate two Filtrex Dust Collectors, SN-26 (50Hp), and SN-27 (30Hp), for a new edge finishing machine.
- 401-AR-11 This permit was issued on October 10, 2001 to authorize the replacement of the existing electric kiln (uncontrolled), SN-22, for a new gas fired heat-cleaning oven. The new oven utilizes an afterburner as control equipment.
- 401-AR-12 This permit was issued on March 26, 2002 to authorize the installation of the panel saw and baghouse (SN-28) for use in cutting silica sand countertops.

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SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

- Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

| SN | Description | Pollutant | lb/hr | tpy |
|------------------------------|---|------------------|-------|------|
| 01 | Large Oven #1 Exhaust (2.0 MMBTU/hr) | PM ₁₀ | 0.9 | 3.8 |
| | | SO ₂ | 0.1 | 0.4 |
| | | VOC | 0.1 | 0.4 |
| | | CO | 0.1 | 0.8 |
| | | NO _x | 0.9 | 3.6 |
| 02, 03, and 08 | Large Oven #1 Hood Vent Large Oven #2 Hood Vent Large Oven #1 Floor Vent "bubbled" | PM ₁₀ | 0.3 | 0.6 |
| | | VOC | 2.8 | 10.9 |
| 04 | Medium Oven #2 Exhaust (0.6 MMBTU/hr) | PM ₁₀ | 2.2 | 9.5 |
| | | SO ₂ | 0.1 | 0.4 |
| | | VOC | 0.1 | 0.4 |
| | | CO | 0.1 | 0.4 |
| | | NO _x | 0.3 | 1.3 |
| 05, 07, 24, 25, and 29 | Medium Oven #2 Hood Vent Medium Oven #2 Hood Vent Thermal Curing Unit "bubbled" | PM ₁₀ | 0.3 | 1.1 |
| | | VOC | 1.5 | 7.2 |
| 06 | THIS UNIT IS NO LONGER IN SERVICE | | | |
| 10 | Small Oven #3 Exhaust (0.6 MMBTU/hr) | PM ₁₀ | 0.5 | 1.3 |
| | | SO ₂ | 0.1 | 0.4 |
| | | VOC | 0.1 | 0.4 |
| | | CO | 0.1 | 0.4 |
| | | NO _x | 0.3 | 1.3 |
| 11 | Small Oven #4 Exhaust (0.5 MMBTU/hr) | PM ₁₀ | 0.4 | 1.4 |
| | | SO ₂ | 0.1 | 0.4 |

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| SN | Description | Pollutant | lb/hr | tpy |
|----|---|------------------|-------|-----|
| | | VOC | 0.1 | 0.4 |
| | | CO | 0.1 | 0.4 |
| | | NO _x | 0.3 | 1.3 |
| 12 | Small Oven #3 & #4 Hood Vent | PM ₁₀ | 0.1 | 0.2 |
| | | VOC | 1.3 | 5.7 |
| 13 | Hoffman Dust Collector (60 HP) | PM ₁₀ | 0.5 | 2.2 |
| 14 | Hoffman Dust Collector (75 HP) | PM ₁₀ | 0.5 | 2.2 |
| 15 | Silica Filler Silo | PM ₁₀ | 0.1 | 0.1 |
| 16 | Natural Gas Fired Boiler (1.674 MMBTU/hr) | PM ₁₀ | 0.1 | 0.4 |
| | | SO ₂ | 0.1 | 0.4 |
| | | VOC | 0.1 | 0.4 |
| | | CO | 0.2 | 0.9 |
| | | NO _x | 0.8 | 3.5 |
| 17 | Natural Gas Fired Boiler (2.511 MMBTU/hr) | PM ₁₀ | 0.1 | 0.4 |
| | | SO ₂ | 0.1 | 0.4 |
| | | VOC | 0.1 | 0.4 |
| | | CO | 0.3 | 1.3 |
| | | NO _x | 1.1 | 4.8 |
| 18 | Laboratory Hood #1 | PM ₁₀ | 0.1 | 0.4 |
| | | VOC | 0.1 | 0.4 |
| 19 | Laboratory Hood #2 | PM ₁₀ | 0.1 | 0.4 |
| | | VOC | 0.1 | 0.4 |
| 20 | Blasting Machine | PM ₁₀ | 0.9 | 3.9 |
| 21 | Touch-up Paint Booth | VOC | 1.1 | 4.8 |
| 22 | Gas Fired Heat-cleaning Oven | PM ₁₀ | 0.1 | 0.1 |
| | | SO ₂ | 0.1 | 0.1 |
| | | NO ₂ | 0.1 | 0.1 |
| | | CO | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |

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| SN | Description | Pollutant | lb/hr | tpy |
|----|--------------------------------|------------------|-------|------|
| 23 | Solvent Cleaning | VOC | 7.6 | 33.1 |
| 26 | Filtrex Dust Collector (50 Hp) | PM ₁₀ | 0.2 | 0.6 |
| 27 | Filtrex Dust Collector (30 Hp) | PM ₁₀ | 0.2 | 0.6 |
| 28 | Panel Saw Baghouse | PM ₁₀ | 0.7 | 2.6 |

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

| SN | Description | Pollutant | lb/hr | tpy |
|------------------------------|---|--|-------------------|-------------------|
| 01 | Large Oven #1 Exhaust (2.0 MMBTU/hr) | Phthalic Anhydride * PM | 0.8 0.9 | 3.4 3.8 |
| 02, 03, and 08 | Large Oven #1 Hood Vent Large Oven #2 Hood Vent Large Oven #1 Floor vent "bubbled" | Phthalic Anhydride * Xylene * PM | 0.3 0.4 0.3 | 0.2 0.4 0.6 |
| 04 | Medium Oven #2 Exhaust (0.6 MMBTU/hr) | Phthalic Anhydride * Xylene * PM | 0.4 0.5 2.2 | 1.7 2.2 9.5 |
| 05, 07, 24, 25, and 29 | Medium Oven #2 Hood Vent Medium Oven #2 Hood Vent Thermal Curing Unit "bubbled" | Phthalic Anhydride * Xylene * PM | 0.2 0.3 0.3 | 0.4 0.9 1.1 |
| 06 | THIS UNIT IS NO LONGER IN SERVICE | | | |
| 10 | Small Oven #3 Exhaust (0.6 MMBTU/hr) | Phthalic Anhydride * PM | 0.3 0.5 | 1.0 1.3 |
| 11 | Small Oven #4 Exhaust (0.5 MMBTU/hr) | Phthalic Anhydride * PM | 0.3 0.4 | 1.0 1.4 |
| 12 | Small Oven #3 & #4 Hood Vent | Phthalic Anhydride * Xylene * PM | 0.1 0.1 0.1 | 0.2 0.4 0.2 |
| | | | | |

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| SN | Description | Pollutant | lb/hr | tpy |
|----|--|-----------|-------|-----|
| 13 | Hoffman Dust Collector (60 HP) | PM | 0.5 | 2.2 |
| 14 | Hoffman Dust Collector (75 HP) | PM | 0.5 | 2.2 |
| 15 | Silica Filler Silo | PM | 0.1 | 0.1 |
| 16 | Natural Gas Fired Boiler (1.674 MMBTU/hr) | PM | 0.1 | 0.4 |
| 17 | Natural Gas Fired Boiler (2.511 MMBTU/hr) | PM | 0.1 | 0.4 |
| 18 | Laboratory Hood #1 | PM | 0.1 | 0.4 |
| 19 | Laboratory Hood #2 | PM | 0.1 | 0.4 |
| 20 | Blasting Machine | PM | 0.9 | 3.9 |
| 21 | Touch-up Paint Booth | Toluene* | 3.5 | 3.5 |
| 22 | Gas Fired Heat-cleaning Oven | PM | 0.1 | 0.1 |
| 26 | Filtrex Dust Collector (50 Hp) | PM | 0.2 | 0.6 |
| 27 | Filtrex Dust Collector (30 Hp) | PM | 0.2 | 0.6 |
| 28 | Panel Saw Baghouse | PM | 0.7 | 2.6 |

* Indicates a Hazardous Air Pollutant (HAP)

3. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

| SN | Limit | Regulatory Citation |
|-------------|-------|---------------------|
| 01 | 5% | 18.501 |
| 02, 03 & 08 | 5% | 18.501 |
| 04 | 5% | 18.501 |
| | | |

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| SN | Limit | Regulatory Citation |
|-------------------------|-------|---------------------|
| 05, 07, 24, 25, and 29. | 5% | 18.501 |
| 10 | 5% | 18.501 |
| 11 | 5% | 18.501 |
| 12 | 5% | 18.501 |
| 13 | 5% | 18.501 |
| 14 | 5% | 18.501 |
| 15 | 5% | 18.501 |
| 16 | 5% | 18.501 |
| 17 | 5% | 18.501 |
| 18 | 0% | 18.501 |
| 19 | 0% | 18.501 |
| 20 | 5% | 18.501 |
| 21 | 5% | 18.501 |
| 22 | 5% | 18.501 |
| 23 | 5% | 18.501 |
| 26 | 5% | 18.501 |
| 27 | 5% | 18.501 |
| 28 | 5% | 18.501 |

4. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 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.
5. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and

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§8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.

6. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the following VOC formulations nor process more than the following throughput of raw materials and solvent-based products per consecutive 12 month period.

| Material | VOC lb/gal | 12 Consecutive Month Limit (Tons) |
|---|-----------------------|--|
| Epoxyn Mix Poured | ----- | 33,000 |
| Ground Silica Sand (SN-15) | ----- | 25,000 |
| Abrasive Material for Blasting (SN-20) | ----- | 30.5 |
| VM&P Naphtha | 6.3 | 10.8 |
| Toluene | 7.3 | 3.5 |
| Xylene | 7.3 | 4.8 |
| Aerosol Spray Paint Cans | 6.0 | 4.3 |
| Ethyl 3-ethoxypropionate (EEP) | 7.9 | 10.8 |
| Isopropyl Alcohol | 6.8 | 25.8 |
| Mineral Spirits | 6.6 | 1.3 |
| QZ-13 Mold Release | 4.0 | 9.3 |
| Freekote 4368G | 5.3 | |
| Ease Release 207 | 6.0 | |

7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee may substitute a new VOC containing product for a currently permitted product (listed in Specific Condition 6) if the proposed product has a total VOC content equal to or less than the permitted product.
8. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and

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§8-4-311, all HAPS must also be VOCs.

9. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall only use pipeline quality natural gas to fuel the ovens. Natural gas usage shall not exceed a total of 297.2 MMCF per year, based on a 12 month rolling period. Monthly records of total fuel usage shall be maintained on site and made available for inspection by Air Division personnel upon request. These records shall be updated by the end of the month following the month to which the records pertain.
10. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed a maximum of 180,822 pounds of Epoxyn Mix poured per 24 hour period. Epoxyn shall maintain records of epoxy resin usage on a daily basis.
11. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain daily records which demonstrate compliance with Specific Condition #10. Records shall be updated by the noon of the day following the day to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.
12. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #9, and Specific Condition 13. Records shall be updated by the fifteenth day of the month following the month to which the records pertain and each time a different material is used. These records shall be kept on site, and shall be made available to Department personnel upon request. A twelve month rolling average and each individual month's data shall be kept on site.
13. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the following formulations of HAPS in materials and solvent-based products per consecutive 12 month period.

| Material | HAPS lb/gal |
|--------------------------|------------------------|
| Toluene (HAP) | 7.3 |
| Xylene (HAP) | 7.3 |
| Aerosol Spray Paint Cans | 3.3 |
| QZ-13 Mold Release | 0.2 (Xylene) |

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| Material | HAPS lb/gal |
|-----------------|------------------------|
| Freekote 4368G | 0.2 (Xylene) |

** Epoxyn Mix contains Phthalic Anhydride, a HAP, however, less than 1% volatilizes during the curing process.

14. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee may substitute a new HAP containing product for a currently permitted product if the proposed product has a HAP (Hazardous Air Pollutant) content equal to or less than the permitted product. The HAPS in the substituted product must have a TLV equal to or greater than the currently permitted product. Record of the TLV and weight percent of each product must be maintained.
15. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records which demonstrate compliance with Specific Condition #14. Records shall be updated each time a different material is used. These records shall be kept on site, and shall be made available to Department personnel upon request. A twelve month rolling average and each individual month's data shall be kept on site.
16. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cut more than 990,584 linear feet of silica sand material at the facility per consecutive 12 month period.
17. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with the annual silica sand material limit. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling average and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request.

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SECTION V: INSIGNIFICANT ACTIVITIES

The following types of activities or emissions are deemed 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 June 24, 2003.

| Description | Category |
|------------------------|----------------------|
| SN-09 (Melt Tank Hood) | A-13 (Closed System) |

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SECTION VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall 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 thereunder.
3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, records must be kept for five years which will 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 records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.
6. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A.

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§8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

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

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall 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:

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- 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 that all reasonable measures have been taken 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 shall 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, it need not be submitted again.
11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
 - 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
 - e. To perform an operation and maintenance inspection of the permitted source
12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued 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.
13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A.

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§8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred.

An applicant for a transfer shall 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. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.

15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.