

# ADEQ MINOR SOURCE AIR PERMIT

Permit #: 0401-AR-16

IS ISSUED TO:

Epoxyn Products  
500 East 16<sup>th</sup> 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:

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Michael Bonds  
Chief, Air Division

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Date

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**  
**Table of Contents**

Section I: FACILITY INFORMATION.....	4
Section II: INTRODUCTION.....	5
Summary of Permit Activity.....	5
Process Description.....	5
Regulations.....	7
Total Allowable Emissions.....	7
Section III: PERMIT HISTORY.....	8
Section IV: EMISSION UNIT INFORMATION.....	10
Section V: INSIGNIFICANT ACTIVITIES.....	17
Section VI: GENERAL CONDITIONS.....	18

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

**List of Acronyms and Abbreviations**

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

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

**SECTION I: FACILITY INFORMATION**

PERMITTEE:	Epoxyn Products
AFIN:	03-00027
PERMIT NUMBER:	0401-AR-16
FACILITY ADDRESS:	500 East 16 <sup>th</sup> Street Mountain Home, AR 72653
MAILING ADDRESS:	500 East 16 <sup>th</sup> Street Mountain Home, AR 72653
COUNTY:	Baxter County
CONTACT POSITION:	John Stroh
TELEPHONE NUMBER:	(870) 425-0823
REVIEWING ENGINEER:	Siew Low
UTM North-South (X):	Zone 15: 4019 km
UTM East-West (Y):	Zone 15: 556 km

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

## **SECTION II: INTRODUCTION**

### **Summary of Permit Activity**

Epoxyn Products operates a facility which manufactures laboratory countertops in Mountain Home, Arkansas. This permitting action increases the VOC content of ethyl 3-ethoxypropionate (EEP) from 7.9 lbs/gal to 8.0 lbs/gal. There is no actual change in the EEP content, and the existing permitted emission rates are already rounded up in the calculations. Therefore, there is no change in the permitted VOC lb/hr or tpy emission limits.

### **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 320°F 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 310°F. 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 350°F until the castings are cured. There are four 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) and a small “trinkets” area. They share one ventilation cool air exhaust hood (SN-12). There are four thermal curing ovens (SN-24, SN-25, SN-29, and SN-30) that utilize a Mobil-Therm oil electric heating system. SN-29 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.

#### **Fabrication**

**Epoxy Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

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 HAPs. Two panel saws located in this area are used for slabs of silica sand material. Emissions from the panel saws 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. The small part 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. There is also a hand application area of new clear edge dressing to laboratory countertops (SN-31). 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.

The following table contains the regulations applicable to this permit.

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004

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	8.9	34.4
PM <sub>10</sub>	8.9	34.4
SO <sub>2</sub>	0.7	2.5
VOC	22.9	80.6
CO	1.0	4.3
NO <sub>x</sub>	3.8	15.9
<i>Phthalic Anhydride*</i>	2.95	7.92
<i>Xylene*</i>	1.89	6.5
Total HAP*	8.34	17.92

Italic indicates Hazardous Air Pollutant (HAP)

\* HAPs included in the VOC totals

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

### **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 those 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



**Epoxy Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

- Condition #1.
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. Epoxy 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. Epoxy 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.
- 401-AR-13 This permit was issued on September 17, 2003 to authorize the installation and operation of 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. There were no changes in permitted emissions as a result of this installation.
- 401-AR-14 This permit was issued on June 29, 2004 to authorize the following: an increase of the epoxy mix throughput from 180,822 pounds per day to 197,260 pounds per day; a modification of the panel saw baghouse (SN-28) to include a second panel saw exhaust; the installation of a new Thermal Curing Unit (SN-30); and the installation of a natural gas-fired water heater, an insignificant activity.
- 401-AR-15 This permit was issued on April 6, 2005 to authorize the use of diacetone alcohol to reduce the viscosity of the clear edge dressing at an existing working area for hand application of clear edge dressing to laboratory tops (SN-31).

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

#### SECTION IV: EMISSION UNIT INFORMATION

##### Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.  
 [Regulation 19, §19.501 et seq., effective December 19, 2004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01, 02, 03, and 08	Large Oven #1 Exhaust (2.0 MMBTU/hr)	PM <sub>10</sub>	2.0	17.9
	Large Oven #1 Hood Vent	SO <sub>2</sub>	0.2	1.6
	Large Oven #2 Hood Vent	VOC	4.9	39.3
	Large Oven #1 Floor Vent	CO	0.2	2.0
	Bays 1-6 "bubbled"	NO <sub>x</sub>	1.0	7.5
04, 05, and 07	Medium Oven #2 Exhaust (0.6 MMBTU/hr)	PM <sub>10</sub>	0.8	
	Medium Oven #2 Hood Vent	SO <sub>2</sub>	0.1	
	Medium Oven #2 Hood Vent	VOC	1.7	
	Bay 7-8 "bubbled"	CO	0.1	
		NO <sub>x</sub>	0.3	
10, 11, and 12	Small Oven #3 Exhaust (0.6 MMBTU/hr)	PM <sub>10</sub>	0.8	
	Small Oven #4 Exhaust (0.5 MMBTU/hr)	SO <sub>2</sub>	0.1	
	Small Oven #3 Hood Vent	VOC	2.2	
	Small Oven #4 Hood Vent	CO	0.1	
	Trinkets Area	NO <sub>x</sub>	0.5	
24, 25, 29 and 30	Four (4) Thermal Curing Units Bay 11-14 "bubbled"	PM <sub>10</sub>	1.0	
		VOC	2.1	
06	THIS UNIT IS NO LONGER IN SERVICE			
13	Hoffman Dust Collector (60 HP)	PM <sub>10</sub>	0.5	2.2
14	Hoffman Dust Collector (75 HP)	PM <sub>10</sub>	0.5	2.2
15	Silica Filler Silo	PM <sub>10</sub>	0.1	0.1
16	Natural Gas Fired Boiler (1.674 MMBTU/hr)	PM <sub>10</sub>	0.1	0.4
		SO <sub>2</sub>	0.1	0.4
		VOC	0.1	0.4
		CO	0.2	0.9
		NO <sub>x</sub>	0.8	3.5
17	Natural Gas Fired Boiler (2.511 MMBTU/hr)	PM <sub>10</sub>	0.1	0.4
		SO <sub>2</sub>	0.1	0.4
		VOC	0.1	0.4
		CO	0.3	1.3
		NO <sub>x</sub>	1.1	4.8
18	Laboratory Hood #1	PM <sub>10</sub>	0.1	0.4

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

SN	Description	Pollutant	lb/hr	tpy
		VOC	0.1	0.4
19	Laboratory Hood #2	PM <sub>10</sub>	0.1	0.4
		VOC	0.1	0.4
20	Blasting Machine	PM <sub>10</sub>	0.9	3.9
21	Touch-up Paint Area	VOC	3.5	4.8
22	Gas Fired Heat-cleaning Oven	PM <sub>10</sub>	0.1	0.1
		SO <sub>2</sub>	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO <sub>x</sub>	0.1	0.1
23	Solvent Cleaning; Wipe Cleaning; Small Parts Cleaning	VOC	7.6	33.1
26	Filtrex Dust Collector (50 Hp)	PM <sub>10</sub>	0.2	0.6
27	Filtrex Dust Collector (30 Hp)	PM <sub>10</sub>	0.2	0.6
28	Panel Saw Baghouse	PM <sub>10</sub>	1.4	5.2
31	Area for hand application of clear edge dressing to laboratory tops	VOC	0.4	1.7

2. The permittee shall not exceed the emission rates set forth in the following table.  
 [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01, 02, 03, and 08	Large Oven #1 Exhaust (2.0 MMBTU/hr) Large Oven #1 and #2 Hood Vents Large Oven #1 Floor Vent Bays 1-6 "bubbled"	PM <i>Phthalic Anhydride</i> <i>Xylene</i>	2.0 1.06 0.80	17.9 7.9 6.5
04, 05, and 07	Medium Oven #2 Exhaust (0.6 MMBTU/hr) Medium Oven #2 Hood Vents (2) Bay 7-8 "bubbled"	PM <i>Phthalic Anhydride</i> <i>Xylene</i>	0.8 0.52 0.26	
10, 11, and 12	Small Oven #3 Exhaust (0.6 MMBTU/hr) Small Oven #4 Exhaust (0.5 MMBTU/hr) Small Oven #3 and #4 Hood Vents Trinkets Area	PM <i>Phthalic Anhydride</i> <i>Xylene</i>	0.8 0.33 0.31	
24, 25,	Four (4) Thermal Curing Units	PM	1.0	

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

SN	Description	Pollutant	lb/hr	tpy
29 and 30	Bay 11-14 "bubbled"	<i>Phthalic Anhydride</i> <i>Xylene</i>	1.04 0.52	
06	THIS UNIT IS NO LONGER IN SERVICE			
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 Area	<i>Total HAPs</i>	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	1.4	5.2

Italic indicates a Hazardous Air Pollutant (HAP)

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

SN	Limit	Regulatory Citation
01, 02, 03, and 08	5%	18.501
04, 05, and 07	5%	18.501
24, 25, 29, and 30	5%	18.501
10, 11, 12, 13, 14, 15, 16, and 17	5%	18.501
18 and 19	0%	18.501
20, 21, 22, 23, 26, 27, 28 and 31	5%	18.501

4. The permittee shall not cause or permit the emission of air contaminants, including odors

**Epoxyn Products****Permit #: 0401-AR-16****AFIN: 03-00027**

or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.801 and A.C.A. §8 4 203 as referenced by A.C.A. §8 4 304 and §8 4 311]
6. 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. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

<b>Material</b>	<b>VOC lb/gal</b>	<b>12 Consecutive Month Limit (Tons)</b>
Epoxyn Mix Poured	-----	36,000
Ground Silica Sand (SN-15)	-----	25,000
Abrasive Material for Blasting (SN-20)	-----	30.5
VM&P Naphtha	6.3	10.8
Aerosol Spray Paint Cans	6.0	4.3
Ethyl 3-ethoxypropionate (EEP)	8.0	10.8
Isopropyl Alcohol	6.8	25.8
Mineral Spirits	6.6	1.3
Mold Release	7.3	12.5
Xylene from mold release	3.9	6.5
Diacetone Alcohol at SN-31	100%	1.7

7. 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. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. All HAPS must also be VOCs. Phthalic Anhydride shall also be considered PM/PM<sub>10</sub> for purposes of emission inventory. [Regulation 18, §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
9. 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.

**Epoxyn Products****Permit #: 0401-AR-16****AFIN: 03-00027**

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. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

10. The permittee shall not exceed a maximum of 197,260 pounds of Epoxyn Mix poured per 24 hour period. Epoxyn shall maintain records of epoxy resin usage on a daily basis. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
11. 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. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
12. The permittee shall maintain monthly records which demonstrate compliance with Specific Conditions #6 and #7. 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. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**SN-01, 02, 03, 04, 05, 07, 08, 10, 11, 12, 24, 25, 29, and 30 (Ovens and Thermal Curing Units)**

13. The permittee shall not exceed the following formulation of HAPs in mold release per consecutive 12 month period at SN-01, 02, 03, 04, 05, 07, 08, 10, 11, 12, 24, 25, 29, and 30. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	HAPS (lb/gal)
Xylene from Mold Release	3.9

14. The permittee may substitute a new HAP-containing product for a currently permitted mold release 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. Records of the TLV and weight percent of each product must be maintained. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. The permittee shall maintain records which demonstrate compliance with Specific Conditions #13 and #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. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**  
and §8-4-311]

**SN-28 (Panel Saw Baghouse)**

16. The permittee shall not collect more than 520 tons of dust in the panel saw baghouse per consecutive 12 month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. The permittee shall maintain monthly records which demonstrate compliance with the dust limit. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request. [Regulation 19, §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**SN-21 (Touch Up Paint Area)**

18. The permittee shall not exceed the Hazardous Air Pollutant (HAP) content limits at SN-21 as set forth in the following table.

TLV greater than or equal to (mg/m3)	Maximum Allowable Weight Content (Wt %) for material at SN-21
90.16	100
81.14	90
72.12	80
63.11	70
54.09	60
45.08	50
36.06	40
27.04	30
18.03	20
9.16	10
4.50	5
3.60	4
2.70	3
1.80	2
0.916	1
0.0916	0.1

19. The permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition #18, and which may be used by the Department for enforcement purposes. Compliance shall be determined by inspecting the American Conference of

**Epoxyn Products****Permit #: 0401-AR-16****AFIN: 03-00027**

Governmental Industrial Hygienists (ACGIH) TLV values as listed on current MSDS forms, or in the most recently published ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs), and properly noting on the monthly HAP records (required by Specific Condition #20) whether the material in question is compliant with the table contained in Specific Condition #18. These records shall be maintained on site and shall be provided to Department personnel upon request. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

20. The permittee shall maintain monthly records of the HAP emissions at SN-21 in order to demonstrate compliance with tons per year emission limits. All HAPs that are capable of being emitted as air emissions and are contained in materials issued for use at SN-21 shall be considered to be emitted. A 12-month rolling total and each individual month's data shall be maintained on a facility-wide basis. These records shall be maintained on site and shall be made available to Department upon request. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]



**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

#### **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 1, 2005.

Description	Category
SN-09, Melt Tank Hood (Closed System)	A-13
SN-31, Natural Gas-fired Water Heater, (0.4 MM Btu/hr)	A-1
45 kW Emergency Generator (150,000 Btu/hr)	A-1

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

**Section VI: GENERAL CONDITIONS**

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

Arkansas Department of Environmental Quality  
Air Division

**Epoxyn Products**

**Permit #: 0401-AR-16**

**AFIN: 03-00027**

ATTN: Compliance Inspector Supervisor

Post Office Box 8913

Little Rock, AR 72219

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

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

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

**Epoxyn Products**  
**Permit #: 0401-AR-16**  
**AFIN: 03-00027**

15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]