

July 30, 2007

Mr. Mark Bailey, Engineer IC Corporation P.O. Box 6000 Conway, Arkansas 72033

Re:

Notice of Administrative Amendment

AFIN: 23-00004, Permit No.: 536-AOP-R4

Dear Mr. Bailey:

Enclosed is revised Permit 536-AOP-R4 completed in accordance with the provisions of Section 26.901 of Regulation No. 26, effective September 26, 2002.

Page number 41, Section VII: Insignificant Activities list was updated to include a 0.695 MM Btu/hr burn-off oven. The date this permit was amended has been added to the footer of this page.

Please place the revised permit in your files.

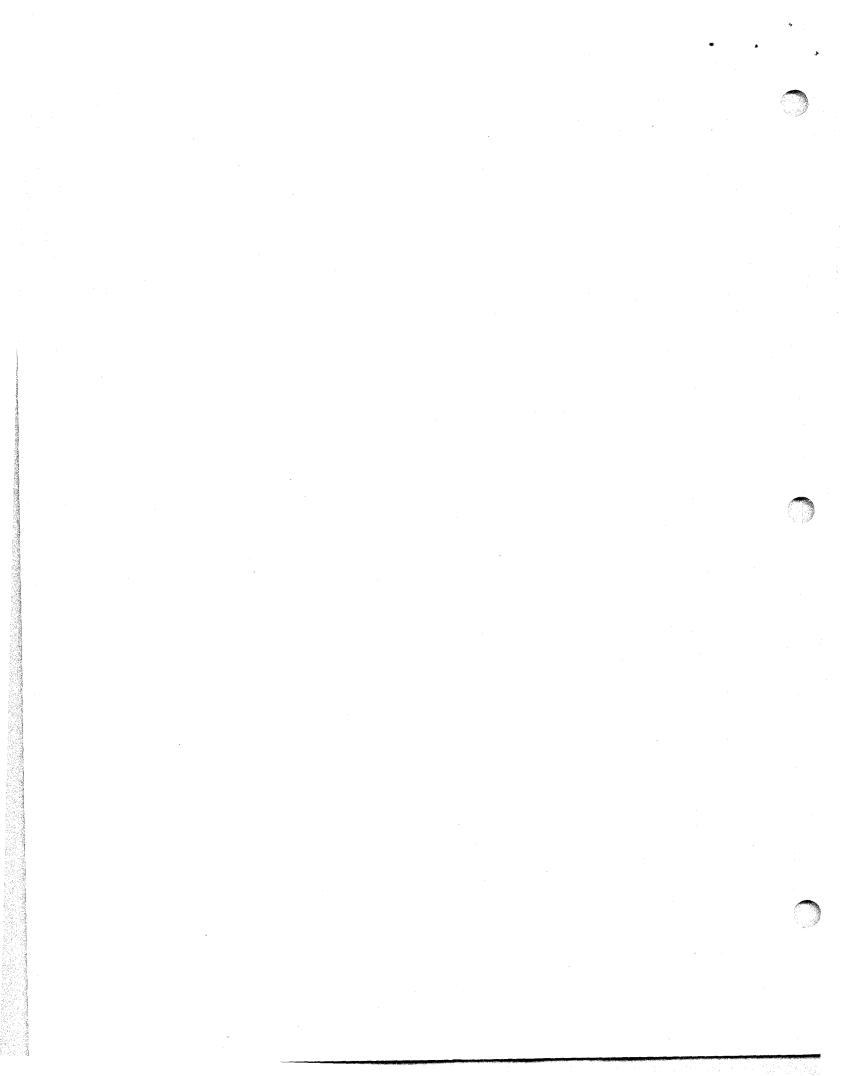
Sincerely,

Mike Bates

Chief, Air Division

dlb

Enclosure



# ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. 536-AOP-R4
Renewal #1
IS ISSUED TO:
IC Corporation
751 South Harkrider
Conway, AR 72034
Faulkner County
AFIN: 23-00004

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

January 13, 2004

AND

January 12, 2009

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates

Chief, Air Division

Date Amended

IC Corporation
Permit #: 536-AOP-R4

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#### 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

MVAC Motor Vehicle Air Conditioner

No. Number

NO<sub>x</sub> Nitrogen Oxide

PM Particulate Matter

PM<sub>10</sub> Particulate Matter Smaller Than Ten Microns

SNAP Significant New Alternatives Program (SNAP)

SO<sub>2</sub> Sulfur Dioxide

SSM Startup, Shutdown, and Malfunction Plan

Tpy Tons Per Year

UTM Universal Transverse Mercator

VOC Volatile Organic Compound

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#### SECTION I: FACILITY INFORMATION

PERMITTEE:

IC Corporation

AFIN:

23-00004

PERMIT NUMBER:

536-AOP-R4

**FACILITY ADDRESS:** 

751 South Harkrider

Conway, AR 72034

MAILING ADDRESS:

P.O. Box 6000

Conway, AR 72033

COUNTY:

Faulkner

CONTACT POSITION:

**Environmental Engineer** 

TELEPHONE NUMBER:

(501) 505-2243

REVIEWING ENGINEER: Derrick L. Brown

UTM North South (Y):

Zone 15: 3,880.5 km

UTM East West (X):

Zone 15: 551.2 km

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#### SECTION II: INTRODUCTION

#### **Summary of Permit Activity**

IC Corportaion assembles and paints school busses and school bus chassis at their facility in Conway, Arkansas. Also, IC Corporation assembles medium duty truck chassis for outside sales. This permit modification includes the provisions of 40 CFR Part 63, Subpart MMMM and Subpart PPPP. This modification also removes SN-07 as a permitted source.

#### **Process Description**

IC Corporation assembles and paints school busses and school bus chassis at their facility in Conway, Arkansas. Also, IC Corporation assembles medium duty truck chassis for outside sales at the facility. An overview of operations with air emissions follows.

Prior to going to the assembly process, small bus parts (hinges, covers, etc.) along with sub-assemblies (luggage boxes and doors) are processed through a 5-stage metal pre-treatment system. The pre-treatment process provides an acceptable surface in order for the coatings to properly adhere. The pre-treatment process consists of a wash stage, rinse stage, phosphate conversion coat stage, rinse stage and final seal. The parts sub-assemblies proceed from the pre-treatment system into a dry-off oven. The treated parts are then conveyed to the Conveyor I Painting Operation (SN-01) where primer or a topcoat is applied to the parts. After the coating is applied, the part or sub-assembly proceeds through a bake oven to ensure proper curing of the coating. The cured parts and sub-assemblies are then used in the main assembly process.

The main assembly process consists of a raised chain conveyor, which allows bus bodies to be assembled on a moving line. The assembly process begins with the bus floor and then proceeds into the framing area where the support structure for the body is assembled. From the framing area the body proceeds into the skin and lining area where the external and internal sheeting is applied. After the body is framed and sheeted it proceeds into the Mainline Painting and Adhesive Operation (SN-02). The Mainline Painting and Adhesive Operations:

Application of a water-based asphaltic underbody sealer.

Cleaning of the interior and exterior of the bus body through the use of a solvent. Hand-wipe process.

Priming of minor body repair and fasteners.

Application of the interior coating with use of manual spray guns.

Application of the exterior coating with the use of reciprocating automatic spray guns. Application of the exterior coating (front and rear) with the use of manual spray guns.

Bake oven used to cure both the interior and exterior coatings.

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Installation of flooring material utilizing a specialized contact adhesive.

The bus body then progresses through a number of finishing stations where internal and external components (heaters, windows, etc.) are applied to the body, before being mated with a bus chasis.

Bus chassis and medium duty truck chassis are assembled on site. The chassis frame is painted in the Chassis Painting Operation (SN-03), before being mated with a bus body. Additionally, the hood and cowl for the conventional school bus chassis is painted at the Hood and Cowl Painting Operation (SN-09). The painted hood and cowl is then mated to the chassis before the chassis is mated with a bus body.

The mated bus body and chassis, then proceed through additional finishing operations. During the finish operations minor defects and imperfections are generated that require touch-up painting. This takes place in the off-line portion of the Mainline Painting and Adhesive Operation (SN-02).

Other sources of emissions include Miscellaneous VOC Emissions (SN-05), which includes all fugitive emissions and Natural Gas Combustion Sources (SN-08), which includes all ovens related to paint curing.

#### Regulations

The following table contains the regulations applicable to this permit.

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 May 28, 2006
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.
40 CFR Part 63, Subpart <i>PPPP</i> , National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

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

### **Emission Summary**

EMISSION SUMMARY				
Source			Emission Rates	
Number	Description	Pollutant	lb/hr	tpy
		PM	46.0	9.7
		PM <sub>10</sub>	46.0	9.7
		SO <sub>2</sub>	0.1	0.1
	Total Allowable Emissions	VOC	913.1	302.5
		СО	2.0	8.7
		$NO_X$	27.6	15.3
······································		HAPs*	812.9	34.9
	Air Contaminants **	Acetone t-butyl Acetate	932.1 932.1	104.4***
SN	Description	Pollutant	932.1 lb/hr	tpy
01	Conveyor I Painting Operation	VOC Acetone HAPs	118.1 118.1 105.0	301.9*** 104.4*** 34.8***
02	Main Line Painting and Adhesive Operations (multiple stacks)	VOC Acetone t-butyl Acetate HAPs	614.5 614.5 614.5 546.3	301.9*** 104.4*** 39.8*** 34.8***
03	Chassis Painting Operation (multiple stacks)	VOC Acetone t-butyl Acetate HAPs	29.5 29.5 29.5 29.5 52.5	301.9*** 104.4*** 39.8*** 34.8***
04	Vanguard Painting Line	Removed from service.		<del></del>
05	Miscellaneous VOCs (fugitive)	VOC Acetone t-butyl Acetate HAPs	91.8 110.9 110.9 56.2	301.9*** 104.4*** 39.8*** 34.8***

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06	Wood Shop Cyclone	Never Installed-Removed from service.		
07	Paint Conveyor Chain Burn-Off Oven and Afterburner	Removed.		
		PM/PM <sub>10</sub>	0.2	0.8
	Natural Gas Combustion Sources (multiple stacks)	$SO_2$	0.1	0.1
08		VOC	0.1	0.6
		CO	2.0	8.7
1		$NO_x$	2.4	10.4
		VOC	59.1	301.9***
	1 15 15 1	Acetone	59.1	104.4***
09	Hood and Cowl Painting Operation	t-butyl Acetate	59.1	39.8***
	,	HAPs	52.5	34.8***
		PM/PM <sub>10</sub>	45.8	8.9
10	Plasma and Laser Cutting Operation	$NO_x$	25.2	4.9
1		HAPs	0.4	0.1

<sup>\*</sup>HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

<sup>\*\*</sup>Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

<sup>\*\*\*</sup>Plantwide applicability limit for Sources 01, 02, 03, 05 and 09.

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#### SECTION III: PERMIT HISTORY

Ward Industries, Incorporated received its first air permit (536-A) on February 27, 1979 to expand its assembly and painting facilities. After the expansion, there were three paint lines with each line having two spray booths and two drying ovens. The paint was applied using electrostatic spray equipment. Emissions of particulate matter (paint solids) were controlled by dry filters.

Air Permit 536-AR-1 was issued January 11, 1988, to acknowledge the 1980 change in ownership, and the name changed from Ward Industries, Incorporated to American Transportation Corporation ("AmTran"). The permit application also included several new sources added since the ownership change. AmTran had added five spray areas, one bake oven, and one undercoat spray area located in a pit. The VOC emissions for this permit were raised to 357 tpy, an increase of 126 tpy. This permit established AmTran as a major stationary source for VOCs.

Air Permit 536-AR-2 was issued August 12, 1992 to cover the construction and installation of the chassis assembly line and paint booth. The new paint booth was permitted for 16.18 tpy of VOC. The total emission increase for this permit was 11.54 tpy of VOC emissions, bringing the total permitted VOC emissions to 368.54 tpy.

Air Permit 536-AR-3 was issued March 11, 1997, to more accurately reflect emissions at the facility and to account for increased production. This permit also allowed for a Plantwide Applicability Limit ("PAL") to be applied to the VOC emissions from the painting and sealing operations. The total permitted VOC emissions limit was 408.5 tpy of which 406.8 tpy was for VOCs emitted from paints, sealants, solvents, etc. Of the 406.8 tpy of VOCs, 294.7 tpy is classified as hazardous air pollutants (HAPs).

Permit 536-AOP-R0 was issued to AmTran on September 30, 1998. This was the first Title V operating permit issued to AmTran under Regulation #26. There were no physical changes to this facility or changes in emissions.

Permit 536-AOP-R1 was issued to AmTran Corporation on January 30, 2001. This modification allowed for replacement of the Conveyor I Painting Line (SN-01A), installation of a new Hood and Cowl Painting Line (SN-09), installation of a new Corrosion Protection Booth and a new water test booth (both included in SN-02), removal of the Vanguard Paint Line (SN-04) and Wood Shop Cyclone (SN-06), and recalculation of overall lb/hour emission rates.

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#### **PSD Netting History for 536-AOP-R1**

For this modification, AmTran performed a PSD netting exercise in regards to the installation of a replacement Conveyor Paint System (SN-01A). AmTran determined that the contemporaneous period as it relates to the new conveyor line is January 1, 1995 to January 1, 2000. AmTran then determined the creditable increases and decreases at the facility.

Increases included a 38.3 tpy increase of VOC in 1997 and a 69.2 tpy increase in VOC in 1999 (the increase that triggered this exercise). Decreases were removal of the Vanguard paint line (SN-04) in 1997 which lowered VOC emissions by 15.81 tpy and removal of the old Conveyor Paint System (SN-01) which lowered VOC emissions by 77.16 tpy. Summing up the increases and decreases gave a netted increase of 14.53 tpy of VOC. This is lower than the 40.0 tpy PSD threshold and is therefore not subject to PSD review.

Also included in this modification is an increase not related to the new conveyor system. A new Hood & Cowl Painting Line (SN-09) was installed in February 2000. This is outside of the contemporaneous period. This source has a limit of 38.2 tons per year of VOC and 8.0 tons per year of HAPs. This is under the PSD significance level. Therefore, this facility is not subject to PSD regulations at this time.

Permit Number 536-AOP-R2 was issued to IC Corporation on June 25, 2003. This modification increased permitted throughput of Butyl Cellosolve from 12,000 pounds (approximately 1,598 gallons) to 5,940 gallons during any consecutive 12-month period.

Because this facility has a facilitywide VOC and HAP emissions bubble, no increase in permitted emissions has been requested, only an increase in throughput for Butyl Cellosolve. Therefore, there are no changes needed to any past PSD netting analysis.

Permit Number 536-AOP-R3 was issued on January 13, 2004. This was the first Title V Renewal for IC Corporation. This renewal added a clarified Plantwide Applicability Limit (PAL) for painting, and also added a Plasma and Laser Cutting Operation (SN-10).

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#### SECTION IV: SPECIFIC CONDITIONS

#### SN-01 Conveyor I Painting Operations

#### Source Description

On Conveyor I, bus parts are washed and treated with zinc phosphate in a series of five tanks prior to painting. Four of these wash stages are heated inductively with natural gas which exhausts through roof vents in the roof. A hot air dryer is used to dry parts immediately before painting. This dryer is indirectly heated with natural gas which also vents to the roof. In the Conveyor I paint booths, small parts are painted manually with primer paint. Four booths are available for this operation, and they vent to the roof. In the Conveyor I bake oven, natural gas is used to heat the parts to 250-275°F to expedite the drying of the coatings. The exhaust is vented to the roof through two vents.

#### Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Plantwide Condition #11. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	118.1	(PAL)*

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Plantwide Condition 11. [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]

Pollutant	lb/hr	tpy
Acetone	118.1	(PAL)*
t-butyl Acetate	118.1	(PAL)*
HAPs	105.0	(PAL)*

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#### SN-02 Main Line Painting and Adhesive Operation

#### Source Description

The main line begins with the assembly of the bus bodies. Sound deadner is sprayed into appropriate areas and epoxies are applied where necessary. The bus bodies are then sent to the main line undercoat area, in which undercoat is sprayed on the underside of the body to protect it from road damage. The undercoat emissions are filtered and vented to the roof. Next in the main line is the application of interior paint. Interior paint is applied manually with cup guns to the interior body. Exhaust from the interior painting is filtered and vented to the roof. The next stage is the application of exterior paint to the sides and top of the exterior body with an automatic, electrostatic painting system. The exhaust of this exterior painting is filtered and vented to the roof. The bus bodies are then dried in the natural gas bake oven at 300-325°F. the exhaust from the oven is vented to the roof. After the bus bodies are dried, floor mats are installed using spray adhesives. The bus bodies are then mated with a chassis.

The busses then go to the first off-line paint booth. At this booth, rub rails are painted black. The exhaust is filtered and vented to the roof. The busses are then sent to either the second or the third off-line paint booth. Touch-up and repair are performed in both of these paint booths. Additionally, bus tops may be painted white if so requested by the buyer. The exhaust of these booths is filtered and vented to the roof. The busses then go to the undercoat touch-up building where any undercoating damages during assembly is repaired.

#### Specific Conditions

3. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Plantwide Condition 11. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	614.5	(PAL)*

4. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Plantwide Condition 11. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Acetone	614.5	(PAL)*
t-butyl Acetate	614.5	(PAL)*

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HAPs	546.3	(PAL)*	

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#### SN-03 Chassis Painting Operation

#### Source Description

The chassis line begins with chassis assembly. The chassis are then painted in the chassis paint booth. The exhaust of this booth is filtered and vented to the roof. Chassis intended for direct sales leave the assembly line at this point. Some prefabricated chassis are also used at IC Corporation. The rear bumpers are then installed on all chassis. Touch-up painting is then done on the rear bumpers in the prep paint booth. The exhaust of this booth is filtered and vented to the roof.

#### **Specific Conditions**

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Plantwide Condition #11. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	29.5	(PAL)*

6. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Plantwide Condition #11. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Acetone	29.5	(PAL)*
t-butyl Acetate	29.5	(PAL)*
HAPs	52.5	(PAL)*

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#### SN-05 Miscellaneous VOCs

#### Source Description

The source SN-05 has been designated for miscellaneous VOCs. These emissions include upholstery adhesive, epoxy, caulking, methanol used for cleanup, lacquer thinner used for cleaning, undercoat used for touch-up, miscellaneous paint touch-up, seat frame welding exhaust, endcap welding exhaust, plasma cutter exhaust, speed test exhaust, amachine oil vapors, wastewater tank vapors, and storage tank vapors (antifreeze, gasoline, and diesel tanks).

7. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Plantwide Condition #11. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	91.8	(PAL)*

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Plantwide Condition #11. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Acetone	110.9	(PAL)*
t-butyl Acetate	110.9	(PAL)*
HAPs	56.2	(PAL)*

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## SN-08 Natural Gas Combustion Sources

#### Source Description

Throughout the facility's production line IC Corporation has three wash tank systems, three dry off ovens, and five bake ovens, all heated with natural gas. All units are 6 MM BTU or less and are not subject to any NSPS regulation. For the benefit of this permit all these sources have been combined into one source and the emissions calculations are based upon the total potential to emit (pte) of all burners. The equipment included in this source are as follows:

Old SN#	Description	MM BTU/hr
30-35	Conveyor I Wash Tank Heaters	4.75
43-44	Conveyor II Wash Tank Heaters	3.0
36	Conveyor I Drying Oven	2.0
New	Conveyor III Drying Oven	2.0
41.42	Conveyor I Bake Oven	2.5
New Conveyor III Bake Oven 4.0		4.0
24-29	Main Line Bake Oven	6.0
Total of Natural Gas Sources		24.25

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by burning only natural gas and equipment limitations. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
$PM_{10}$	0.2	0.8
$SO_2$	0.1	0.1
VOC	0.1	0.6
СО	2.0	8.7
NO <sub>x</sub>	2.4	10.4

10. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by burning only natural gas and equipment limitations. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.2	0.8

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#### SN-09 Hood & Cowl Painting Operation

#### Source Description

Hoods and Cowls are assembled onsite and then moved to the Hood and Cowl Painting line for final painting. The Hoods and Cowls are then moved to the final assembly where they are mated with bus bodies.

#### Specific Conditions

11. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Plantwide Condition #11. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	59.1	(PAL)*

12. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Plantwide Condition #11. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Acetone	59.1	(PAL)*
t-butyl Acetate	59.1	(PAL)*
HAPs	52.5	(PAL)*

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## SN-10 Plasma and Laser Cutting Operation

#### Source Description

IC Corporation operates a number of manual plasma cutters and a CNC laser to manufacturer parts used during the assembly of a bus body.

13. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Specific Condition #16. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
$PM_{10}$	45.8	8.9
NOx	25.2	4.9

14. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition with records required by Specific Condition #16. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	45.8	8.9
HAPs	0.4	0.1

- 15. The permittee shall not produce in excess of 18,000 busses during any consecutive twelve month period. [Regulation 19, §19.501 and 40 CFR Part 52, Subpart E]
- 16. The permittee shall maintain monthly records which demonstrate compliance with the emission limit set forth in Specific condition #15. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department in accordance with General Condition #7.

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#### SECTION V: COMPLIANCE PLAN AND SCHEDULE

IC Corporation will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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#### SECTION VI: PLANTWIDE CONDITIONS

- 1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
- 3. The permittee must 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) new equipment or newly 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) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. 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 shall submit the compliance test results to the Department within thirty (30) days after completing the 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]
- 4. The permittee must provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms; and
  - d. Utilities for sampling and testing equipment.
- 5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 7. The permittee must prepare and implement a Startup, Shutdown, and Malfunction Plan (SSM). If the Department requests a review of the SSM, the permittee will make the SSM available for review. The permittee must keep a copy of the SSM at the source's location and retain all previous versions of the SSM plan for five years. [Regulation 19, §19.304 and 40 CFR 63.6(e)(3)]

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#### PAL Limits and TLV Table

- 8. The permittee shall not emit more than 301.9 tons per year of VOC at Sources SN-01, SN-02, SN-03, SN-05, and SN-09 combined per consecutive twelve month period. This is a Plantwide Applicability Limit (PAL). Compliance with this condition will be demonstrated by Plantwide Condition #11. [Regulation 19, §19.501 and 40 CFR Part 52, Subpart E]
- 9. The permittee shall not emit more than 104.4 tons of Acetone, 39.8 tons of t-butyl Acetate or 34.8 tons of HAPs at Sources SN-01, SN-02, SN-03, SN-05 and SN-09 combined per consecutive twelve month period. This is a Plantwide Applicability Limit (PAL). Compliance with this condition will be demonstrated by Plantwide Condition #11. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 10. The permittee shall not exceed the following HAP formulated limits at Sources SN-01, SN-02, SN-03, SN-05 and SN-09 combined for the designated TLV. The TLV of a particular compound will be determined using information on the appropriate MSDS or the most recent ACGIH data. Compounds with an extremely low HAP concentration (<1% by weight) are not subject to the table provided that the total emissions of the HAP in question do not exceed 1 ton per year and the combined excepted HAP emissions from these compounds do not exceed 2.5 tons per year. This low concentration exemption does not apply if the Relative Toxicity (RT) of the HAP in question is less than 4.38 times the pound per hour. Compliance with this condition will be demonstrated by Plantwide Condition #11.

Minimum HAP TLV (mg/m³)	Maximum Individual HAP Content Allowed in Coating (lb/gal sprayed)
245.50	4.0
214.81	3.5
184.13	3.0
153.44	2.5
122.75	2.0
92.06	1.5
61.38	1.0
30.69	0.5
6.14	0.1
0.61	0.01

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- 11. The permittee shall maintain monthly records of VOC, Acetone and HAP containing material usage and the associated MSDS which demonstrate compliance with Plantwide Conditions #8, #9, and #10. 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 submitted to the Department in accordance with General Provision #7. [Regulation 19, §19.705, Regulation 18, §18.1004, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 12. Compliance with the facility-specific emission limit and the emission limitations in 40 CFR Part 63 Subpart MMMM for all surface coating operations constitutes compliance with this and other applicable surface coating NESHAP. The procedures for calculating the facility-specific emission limit are specified in §63.3890. In calculating the facility-specific emission limit, the permittee must include coating activities that meet the applicability of other surface coating NESHAP and constitute more than 1 percent of total coating activities at this facility. The permitte must not consider any surface coating activity that is subject to the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) in determining a facility-specific emission limit for your facility. Coating activities that meet the applicability criteria of other surface coating NESHAP but compromise less than 1 percent of total coating activities need not be included in the calculation of the facility-specific emission limit but must be included in the compliance calculations.
- The permittee must comply with 40 CFR Part 63, Subpart MMMM, by January 2, 2007. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3883(b)]
- 14. The permittee, in complying with the facility-specific emission limit alternative, must, in calculating the facility-specific emission limit, include coating activities that meet the applicability criteria of the other subcategories and constitute more than 1 percent of total coating activities. Coating activities that meet applicability criteria of other surface coating NESHAP but comprise less than 1 percent of coating activities need not be included in the determination of predominant activity but must be included in the compliance calculation. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3890(c)(2)]
  - i. The permittee is required to calculate the facility-specific emission limit for this facility when submitting the notification of compliance status required in §63.3910(c), and on a monthly basis afterward using the coating data for the relevant 12-month compliance period.
  - ii. Use the following equation to calculate the facility-specific emission limit for the surface coating operations for each 12-month compliance period.

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Facility - Specific Emission Limit = 
$$\frac{\sum_{i=1}^{n} (Limit_i)(Solids_i)}{\sum_{i=1}^{n} (Solids_i)}$$

Where:

Facility-specific emission limit = Facility-specific emission limit for each 12-month compliance period, kg(lb) organic HAP per kg(lb) coating solids used.

 $Limit_i$  = The new source or existing source emission limit applicable to coating operation, I, included in the facility-specific emission limit, converted to kg(lb) organic HAP per kg(lb) coating solids used, if the emission limit is not already in those units. All emission limits included in the facility-specific emission limit must be in the same units.

Solids $_i$  = the liters (gal) of solids used in coating operation, I, in the 12-month compliance period that is subject to emission limit, i. The permittee may estimate the volume of coating solids used from specifications for the parts or products coated and the number of items produced). The use of parameters other that coating consumption and volume solids must be approved by the Department.

- n = The number of different coating operations included in the facility-specific emission limit.
- iii. If the permittee needs to convert an emission limit in another surface coating NESHAP from kg(lb) organic HAP per kg(ib) coating solids used to kg(lb) organic HAP per liter (gal) coating solids used, the permittee must use the default solids density of 1.26 kg solids per liter coating solids (10.5 lb solids per gal solids).
- 15. The permittee must demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must meet all requirements of §63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option. [Regulation 19, §19.304 and 40 CFR Par 63, §63.3891(b)]
- 16. The permittee must submit the notification of compliance status no later than 30 calendar days following the end of the initial compliance period described in §63.3950 that applies to the facility's affected source. The notification of compliance status must contain the

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information specified in paragraphs (c)(1) through (11) of this section and in §63.9(h). [Regulation 19, §19.304 and 40 CFR Part 63, §63.3910(c)]

1. Company name and address.

- 2. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- 3. Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §63.3940, 63.3950, or 63.3960 that applies to your affected source.
- 4. Identification of the compliance option or options specified in §63.3981 that the permittee used on each coating operation in the affected source during the initial compliance period.
- 5. Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.
- 6. If the facility had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.
  - i. A description and statement of the cause of the deviation.
  - ii. If the facility failed to meet the applicable emission limit in §63.3890, include all the calculations the permittee used to determine the kg (lb) of organic HAP emitted per liter (gal) coating solids used. The permittee does not need to submit information provided by the materials' suppliers or manufacturers, or test reports.
- 7. For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) the permittee used to demonstrate compliance with the emission limit, include an example of how the permittee determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.3941(a), (b), or (c). The permittee does not need to submit copies of any test reports.
  - Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material.
  - ii. Volume fraction of coating solids for one coating.
  - iii. Density for one coating, one thinner and/or other additive, and one leaning material, except that if the permittee uses the compliant material option, only the example coating density is required.

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- iv. The amount of waste materials and the mass of organic HAP contained in the waste materials for which the permittee is claiming an allowance in Equation 1 of §63.3951.
- 8. The calculation of kg (lb) of organic HAP emitted per liter (gal) coating solids used for the compliance option(s) the permittee used, as specified in paragraphs (c)(8)(i) through (iii) of this section.
  - i. For the compliant material option, provide an example calculation of the organic HAP content for one coating, using Equation 2 of §63.3941.
  - ii. For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, or §63.3951.
  - iii. For the emission rate with add-on controls option, provide the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month, using Equations 1 and 1A through 1C of §63.3951; the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; the mass of organic HAP emission reduction each month by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of §63.3961 and Equations 2, 3, and 3A through 3C of §63.3961 as applicable; the calculation of the total mass of organic HAP emissions each month using Equation 4 of §63.3961; and the calculation of the 12-month organic HAP emission rate using Equation 5 of §63.3961.
- 9. For the emission rate with add-on controls option, the permittee must include the information specified in paragraphs (c)(9)(i) through (iv) of this section, except that the requirements in paragraphs (c)(9)(i) through (iv) of this section do not apply to solvent recovery systems for which the permittee would conduct liquid-liquid material balances according to §63.3961(j).
  - i. For each emission capture system, a summary of the data and copies of the calculations supporting the determination that the emission capture system is a

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permanent total enclosure (PTE) or a measurement of the emission capture system efficiency. Include a description of the protocol followed for measureing capture efficiency, summaries of any capture efficiency tests conducted, and any calculations supporting the capture efficiency determination. If the permittee uses the data quality objective (DQO) or lower confidence limit (LCL) approach, the permittee must also include the statistical calculations to show the permittee meets the DQO or LCL criteria in appendix A to subpart KK of this part. The permittee does not need to submit complete test reports.

- 17. The permittee must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of this section. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3920(a)]
  - 1. Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), the permittee must prepare and sumibt each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
    - i. The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.3940, §63.3950, or §63.3960 that applies to the permittee's affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.
    - ii. Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
    - iii. Each semi annual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

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- iv. For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or 40 CFR Part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.
- 2. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
- 3. The semiannual compliance report must contain the information specified in paragraphs (i) through (vii) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to the facility's affected source.
  - i. Company name and address.
  - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
  - iv. Identification of the compliance option or options specified in §63.3981 that the permittee used on each coating operation during the reporting period. If the permittee switched compliance options during

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the reporting period, the permittee must report the beginning and ending dates for each option used.

- v. If the permittee used the emission rate without addonn controls or the emission rate with add-on controls compliance option (§63.3891(b) or (c)), the calcultiaon results for each rolling 12-month organic HAP emission rate during the 6-month reporting priod.
- vi. If the permittee used the predominant activity alternative (§63.3890(c)(1)), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report.
- vii. If the permittee used the facility-specific emission limit alternative (§63.3890(c)(2)), include the calculation of the facility-specific emission limit for each 12-month compliance period during the 6-month reporting period.
- 4. If there were no deviations from the emission limitations in §§63.3890, 63.3892, and 63.3893 that apply to this facility, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If the permittee used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.
- 5. Deviations: Emission rate without add-on controls option. If there was a deviation from the applicable emission limit in §63.3890, the semiannual compliance report must contain the information in paragraphs (i) through (iii) of this section.
  - i. The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890.
  - ii. The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). The permittee does not need to submit background data supporting these

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calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).

iii. A statement of the cause of each deviation.

6. If there was a deviation from the applicable emission limit in §63.3890, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.

- The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890.
- ii. The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). The permittee does not need to submit background data supporting these calculations (e.g., information provided materials suppliers or manufacturers, or test reports).
- iii. A statement of the cause of each deviation.
- 18. The permittee must collect and keep a copy of each notification and report submitted to comply with this subpart, and the documentation supporting each notification and report. Using the facility-specific emission limit alternative under §63.3890(c), the permittee must keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. The permittee must also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3930(a)]
- 19. The permittee must collect and keep a current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the permittee used information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3930(b)]

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- 20. The permittee must collect and keep, for each compliance period, the records specified in paragraphs (1) through (4) of this section. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3930(c)]
  - 1. A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option used.
  - 2. For the compliance material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941.
  - 3. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951.
- 21. The permittee must collect and keep a record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. [regulation 19, §19.304 and 40 CFR Part 63, §63.3930(d)]
- 22. The permittee must collect and keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3930(e)]
- 23. The permittee must collect and keep a record of the volume fraction of coating solids for each coating used during each compliance period. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3930(f)]
- 24. The permittee must collect and keep the density for each coating, thinner and/or additive, and cleaning material used during each compliance period. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3930(g)]
- 25. The permittee must collect and keep, when using an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), records of the information specified in paragraphs (a) through (c) of this section.
  - a. The name and address of each TSDF to which the permittee sent waste materials for which the permittee used an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.

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b. Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of §63.3951.

- c. The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic AHP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.
- 26. The permittee must keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3931(a)]
- 27. The permittee must keep each record as specified in §63.10(b)(1), for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3931(b)]
- 28. The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The permittee may keep the records off-site for the remaining 3 years. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3931(c)]
- 29. The permittee must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.3951. The initial compliance period begins on January 2, 2007 and ends on the last day of the 12<sup>th</sup> month following the compliance date. If the compliance date on any day other than the first day of the month, then the initial compliance period extends through the end of that month plus the next 12 months. The permittee must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.3951 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.3890. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3950]
- 30. The permittee may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.3890, but is not reuired to meet the operating limits or work practice standards in §63.3982 and §63.3983, respectively. The permittee must demonstrate that all coating operations included in the

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calculation of the facility-specific emission limit comply with that limit. The permittee must meet all the requirements of this section. The permittee does not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if the permittee has documentation showing that they received back the exact same materials that were sent off-site) and reused in the coating operation for which the permittee used the emission rate without add-on controls option. If the permittee uses coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3951]

- a. Determine the mass fraction of organic HAP for each material. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.3941(a).
- b. Determine the volume fraction of coating solids. Determine the volume fraction of coating solids (liter (gal) of coating solids per liter (gal) of coating) for each coating used during each month according to the requirements in §63.3941(b).
- c. Determine the density of each material. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98, "Standard Test for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If the permittee is including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM Method D5965-02, "Standard Test Methods for Specific Gravity of Coating Powders" (incorporate by reference, see §63.14), or information from the supplier. If there is disagreement between ASTM Method D1475-98 or ASTM Method D5965-02 test results and other such information sources, the test results will take precedence unless, after consultation the permittee demonstrates the satisfaction of the enforcement agency that the formulation data are correct. If the permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to determine material density. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.
- d. Determine the volume of each material used. Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to determine the volume of each material used. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of this section.
- e. Calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings,

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thinners and/or additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of this section.

$$H_e = A + B + C - R_w$$

Where:

H<sub>e</sub> = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of this section.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in equation 1B of this section.

C = total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of this section.

 $R_w$  = Total mass of organic HAP in waste materials sent or designated for shipment to a Hazardous waste TSDF for treatment or disposal during the month, kg, determined according to paragraph (e)(4) of this section. (The permittee may assign a value of zero to  $R_w$  if they do not wish to use this allowance.

1. Calculate the kg organic HAP in the coatings used during the month using Equation 1A of this section:

$$A = \sum_{i=1}^{m} (Vol_{c,i})(D_{c,i})(W_{c,i}) \quad (Eq. 1A)$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

 $Vol_{c,i}$  = total volume of coating, I, used during the month, liters.

 $D_{c,i}$  = Density of coating, i, kg coating per liter coating.

W = Mass fraction of organic HAP in coating, I, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

m = Number of different coatings used during the month.

2. Calculate the kg or organic HAP in the thinners and/or other additives used during the month using Equation 1B of this section:

$$B = \sum_{j=1}^{n} (Vol_{t,j})(D_{t,j})(W_{t,j}) \quad (Eq. 1B)$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

 $Vol_{t,j}$  = Total volume of thinner and/or other additive, j, used during the month, liters.

 $D_{t,j}$  = Density of thinner and/or other additive, j, kg per liter.

W = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

n = Number of different thinners and /or other additives used during the month.

3. Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of this section:

$$C = \sum_{k=1}^{p} (Vol_{s,k})(D_{s,k})(W_{s,k}) \quad (Eq.1C)$$

Where:

C = total mass of organic HAP in the cleaning materials used during the month, kg.

 $Vol_{s,k}$  = Total volume of cleaning material, k, used during the month, liters.

 $D_{s,k}$  = Density of cleaning material, k, kg per liter.

 $W_{s,k}$  = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

- 4. the permittee may choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then the permittee must determine the mass according to paragraphs (e)(4)(i) through (iv) of this section.
  - i. The permittee may include waste materials in the determination that are generated by coating operations in the affected source for which the permittee uses Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. the TSDF may be either off-site or onsite. The permittee may not include organic HAP contained in wastewater.
  - ii. The permittee must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in the determination any waste materials sent to a TSDF during a month if

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the permittee has already included them in the amount collected and stored during that month or a previous month.

- iii. Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section.
- iv. The permittee must document the methodology used to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.3930(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.
- f. Calculate the total volume of coating solids used. Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$V_{st} = \sum_{i=1}^{m} (Vol_{c,i})(V_{s,i})$$
 (Eq. 2)

Where:

V = Total volume of coating solids used during the month, liters.

Vol = total volume of coating, I, used during the month, liters.

V = Volume fraction of coating solids for coating, I, liter solids per liter coating, determined according to  $\S63.3941(b)$ .

m = Number of coatings used during the month.

g. Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per liter (gal) coating solids used, using Equation 3 of this section:

$$H_{yr} = \frac{\sum_{y=1}^{n} H_e}{\sum_{y=1}^{n} V_{st}}$$
 (Eq. 3)

Where:

 $H_{yr}$  = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.

 $H_e$  = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of this section.

 $V_{st}$  = Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of this section.

y = Identifier for months.

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n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of the month; otherwise n equals 13; for all following compliance periods, n equals 12).

- h. Compliance demonstration. The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section must be less than or equal to the applicable emission limit for each subcategory in §63.3890 or the predominant activity or facility-specific emission limit allowed in §63.3890(c). The permittee must keep all records as required by §63.3930 and §63.3931. as part of the notification of compliance status required by §63.3910, the permittee must identify the coating operation(s) for which the permittee used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.3890, determined according to the procedures in this section.
- 31. To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.3951(a) through (g), must be less than or equal to the applicable emission limit in §63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. The permittee must perform the calculations in §63.3951 (a) through (g) on a monthly basis using data from the previous 12 months of operation. If the permittee is complying with a facility-specific emission limit under §63.3890(c), the permittee must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3952(a)]
- 32. If the organic emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890, this is a deviation from the emission limitation for that compliance period and must be reported as specified in §63.3910(c)(6) and 63.3920(a)(6). [Regulation 19, §19.304 and 40 CFR Part 63, §63.3952(b)]
- 33. As part of each semiannual compliance report required by §63.3920, the permittee must identify the coating operation(s) for which the permittee used the emission rate without add-on controls option. If there were no deviations from the emission limitations, the permittee must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890, determined according to §63.3951(a) through (g). [Regulation 19, §19.304 and 40 CFR Part 63, §63.3952(c)]
- 34. The permittee must maintain records as specified in §63.3930 and §63.3931. [Regulation 19, §19.304 and 40 CFR Part 63, §63.3952(d)]

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35. Compliance with Plantwide Conditions #12 through #34 and calculation of a Facility-Specific Emission Limit for coatings thinners and/or other additives, and cleaning materials applicable to 40 CFR Part 63, Subpart PPPP constitutes compliance with 40 CRF Part 63, Subpart PPPP. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

#### **Title VI Provisions**

- 36. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 37. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 37. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 38. If the permittee performs a service on motor (fleet) vehicles when this service involves

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ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

39. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program."

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### **Permit Shield**

40. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:

a. The following have been specifically identified as applicable requirements based upon the information submitted by the permittee in an application dated April 13, 2006.

Source No.	Regulation	Description	
Facility	Arkansas Regulation #19	Regulations of the Arkansas Plan of	
		Implementation for Air Pollution	
		Control	
Facility	Arkansas Regulation #26	Regulations of the Arkansas	
		Operating Air Permit Program	
Facility	40 CFR Part 63, Subpart MMMM	NESHAP for Surface Coating of	
		Miscellaneous Metal Parts and	
		Products	
Facility	40 CFR Part 63, Subpart PPPP	NESHAP for Surface Coating of	
		Plastic Parts and Products	

b. The following requirements have been specifically identified as not applicable based upon information submitted by the permittee in an application dated April 13, 2006.

Source No.	Regulation	Description	Basis for Determination
Facility	40 CFR Part 60, Subpart MM (NSPS)	Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations	The facility does not assemble automobiles or light trucks as defined in the regulation.
Facility	40 CFR Part 60, Subpart Kb (NSPS)	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)	All storage tanks are classified as deminimis
Facility	40 CFR Part 60, Subpart CCCC	Standards of Performance for Commerical and Industiral Solid Waste Incineration Units	The paint conveyor chain burn off oven is

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Source No.	Regulation	Description	Basis for Determination
			considered an exempt "part reclamation unit."
Facility	40 CFR Part 63, Subpart Q (NESHAP)	National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers	None of the facility's cooling towers are treated with chromiumbased chemicals.
Facility	40 CFR Part 63, Subpart IIII	National Emission Standards for Hazardous Air Pollutants for Automobile and Light-Duty Truck Surface Coating Operations	The facility does not assemble automobiles or light-duty trucks as defined in the regulation
Facility	40 CFR Part 64	Compliance Assurance Monitoring	The Facility does not operate any emissions control equipment.

# c. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

The liability of an owner or operator for any violation of applicable requirements prior to or at the time of issuance;

The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or

The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

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## SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated July 26, 2007.

Description	Category
Aboveground Diesel Storage Tank (Capacity 10,000 gallons)	A-3
Aboveground Diesel Storage Tank (Capacity 6,000 gallons)	A-3
2 Aboveground Antifreeze Storage Tanks (Capacity 2,940 gallons each)	A-3
Aboveground Kerosene Storage Tank (Capacity 500 gallons)	A-3
Aboveground Kerosene Storage Tank (Capacity 275 gallons)	A-3
Aboveground Gasoline Storage Tank (Capacity 550 gallons)	A-3
Wastewater Treatment Testing Laboratory	B-34
Welding Operations	A-7
Emergency Lighting Generator	A-12
0.695 MM Btu/hr burn-off oven (Parts Reclamation)	A-1

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### SECTION VIII: GENERAL PROVISIONS

- 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. [40 CFR 70.6(b)(2)]
- 2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective September 26, 2002]
- 3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
- 4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
- 5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.

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6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

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

- 8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
  - a. For all upset conditions (as defined in Regulation19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report my be made by telephone and shall include:
    - i. The facility name and location
    - ii. The process unit or emission source deviating from the permit limit,
    - iii. The permit limit, including the identification of pollutants, from which deviation occurs,
    - iv. The date and time the deviation started,
    - v. The duration of the deviation,
    - vi. The average emissions during the deviation,
    - vii. The probable cause of such deviations,
    - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
    - ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned

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to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

- 9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
- 11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
- 12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
- 13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]
- 14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of

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records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]

- 15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
- 16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
- 17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
- 18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
- 19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
- 20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
  - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
- 21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The

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permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]

- a. The identification of each term or condition of the permit that is the basis of the certification:
- b. The compliance status;
- c. Whether compliance was continuous or intermittent;
- d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit;
- e. and Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
- 22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,
  - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
- 23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]