ADEQ
OPERATING
AIR PERMIT

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

Permit No. : 693-AOP-R7
Renewal #1
IS ISSUED TO:
Quanex Corporation - MacSteel Division
5225 Planters Road
Fort Smith, AR 72916
Sebastian County
AFIN: 66-00274

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:

August 7, 2003 AND August 6, 2008

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

Signed:

Michael Bonds
Chief, Air Division

Date Modified

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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_x	Nitrogen Oxide
PM	Particulate Matter
PM_{10}	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO_2	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

SECTION I: FACILITY INFORMATION

PERMITTEE:	Quanex Corporation - MacSteel Division
AFIN:	66-00274
PERMIT NUMBER:	693-AOP-R7
FACILITY ADDRESS:	5225 Planters Road Fort Smith, AR 72916
MAILING ADDRESS:	P.O. Box 1592 Fort Smith, Arkansas 72902-1592
COUNTY:	Sebastian
CONTACT POSITION:	Warren Taff, Jr.
TELEPHONE NUMBER:	(479) 648-5544
REVIEWING ENGINEER:	Wesley Crouch
UTM North South (Y):	Zone 15: 3907.8
UTM East West (X):	Zone 15: 375.0

SECTION II: INTRODUCTION

Summary of Permit Activity

MacSteel, a division of Quanex Corporation, operates a scrap steel recycling mill near Fort Smith, in Sebastian County, Arkansas. MacSteel produces approximately 250 grades of steel including alloy, carbon, and resulfurized steels primarily from steel scrap using the electric arc furnace (EAF) process. The two electric arc furnaces (EAFs) at this facility are subject to all applicable regulations under the New Source Performance Standards (NSPS), Subpart AAa.

This permit modification will allow MacSteel to install twin vacuum tank degassers (VTD) to replace the existing vacuum arc degasser (VAD). Due to process and steam capability, only one VTD can be operated at a time, limiting emissions to the same level as the currently permitted VAD. The steam condenser tank and steam exhaust tank will be relocated. MacSteel will also install a new lime silo which will vent to the existing baghouse, SN-01.

This permit shall also increase the 24-hour average steel production rate from 92 to 98 tons per hour (tph). This increase is possible due to a lower caster "saw level floor" and lower caster saws which increase the metallurgical height of the caster. This will increase the caster speed, which in turn can achieve higher steel production. The annual production limit of 631,584 tons per year will not be changed. This change will result in slight emissions increases at SN-13, SN-14, SN-15, SN-22, SN-23, SN-24, SN-25, SN-27 and SN-29. Quanex also requests the following:

1. Revise permit conditions 66 and 67 for miscellaneous process-related painting/labeling (SN-24);
2. Remove the designation of "Safety Kleen" from the parts washers in the Insignificant Activities list;
3. Add two roughing stands to the rolling mill operations listed in the Insignificant Activities list; and
4. Add one hot saw for rolled product to the Insignificant Activities list.
5. Increase slag production from 72,800 to 87,780 tons per year.

These changes will result in increases in permitted emission rates of 1.6 tpy PM/PM_{10}, 0.1 tpy SO_2, 2.8 tpy VOC, 4.6 tpy CO, and 0.1 tpy NO_x.

Process Description

In general, raw materials, including scrap, fluxes, iron carbide, direct reduced iron, hot briquetted iron, pig iron, and other materials, are brought to the facility by rail or truck. Scrap and flux are charged to EAFs and melted by application of electric current through the mixture. Molten metal is poured into a ladle and transferred by an overhead crane to a ladle refining station. Once the molten steel is transferred to the ladle refining station, additional alloys and reagents are added to adjust the chemistry.

From the ladle refining station, the steel is transferred to the stir station and vacuum tank degasser. At the stir station, the steel is stirred by the introduction of argon gas into the bottom of the ladle. Additional alloys also may be added to adjust the chemistry. The steel is then transferred to the vacuum tank degasser. At the degasser, dissolved gases are removed by subjecting the steel to a vacuum. Heat also may be added to the steel with the use of electric arcs.

After leaving the degasser, the steel is transferred to a caster where it is drained from the ladle into a tundish and then into the molds. At the caster, the steel solidifies to a round bar. The bars are cut to length and transferred to either the "as cast" cooling bed or directly to the reheat furnace. Bars transferred to the "as cast" cooling bed are sold or stored for future processing.

In the reheat furnace, the steel bars are heated to the temperature required for rolling. The bars are then rolled to a smaller diameter. Bars exiting the rolling mill are cut to length and transferred to the "rolled product" cooling bed. The bars are then deburred and bundled for shipment, for further processing in the heat treat furnaces and/or bar turner.

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 December 19, 2004
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
40 CFR 52.21, *Prevention of Significant Deterioration*
New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart AAa - *Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed After August 7, 1983*
NSPS, 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units*
40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

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 Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	34.0	130.8
		PM_{10}	34.0	130.8
		SO_2	91.7	335.4
		VOC	21.6	90.0
		CO	455.8	1696.3
		NO_X	84.6	338.6
HAPs*		Lead	0.3	1.0
		Manganese	0.93	3.41
		Cadmium	0.01	0.03
		Arsenic	0.01	0.01
		Methyl Ethyl Ketone*	0.41	2.0
SN	Description	Pollutant	lb/hr	tpy
01	Melt Shop Baghouse 1	PM	27.4	100.3
		PM_{10}	27.4	100.3
		SO_2	90.3	331.6
		VOC	12.0	43.9
		CO	421.4	1547.4
		NO_x	43.9	161.1
		Lead	0.3	1.0
12	Melt Shop Baghouse 2	Manganese	0.93	3.41
		Cadmium	0.01	0.03
		Arsenic	0.01	0.01
02	Reheat Furnace	PM	0.7	2.7
		PM_{10}	0.7	2.7
		SO_2	0.1	0.2
		VOC	0.2	0.6
		CO	1.6	6.9
		NO_x	6.3	27.6

03	Boiler	PM PM_{10} SO_2 VOC CO NO_x	0.7 0.7 0.1 0.2 1.6 6.3	2.7 2.7 0.2 0.6 6.9 27.6
04	Heat Treat Furnace 1	PM PM_{10} SO_2 VOC CO NO_x	0.6 0.6 0.5 0.5 1.3 9.6	2.3 2.3 2.0 2.0 5.7 41.8
05	Heat Treat Furnace 2	PM PM_{10} SO_2 VOC CO NO_x	0.6 0.6 0.1 0.2 1.4 5.4	2.3 2.3 0.2 0.5 5.9 23.6
06	Caster	Vented to SN-01/SN-12		
07	Ladle Metallurgy Furnace			
08	Tundish Preheaters (4)			
09	Ladle Dryout, Refractory Dryer (6), Ladle Preheaters (4)			
10	Deburring Line	PM PM_{10}	0.2 0.2	0.8 0.8
11	Heat Treat Furnace 3	PM PM_{10} SO_2 VOC CO NO_x	0.9 0.9 0.1 0.2 6.0 5.0	3.9 3.9 0.2 0.8 26.2 21.7
13	Vacuum Arc Degreaser	PM PM_{10} SO_2 CO NO_x	0.6 0.6 0.2 17.2 0.2	2.1 2.1 0.6 74.9 0.6
14	Caster Steam Exhaust 1	PM PM_{10}	0.3 0.3	0.8 0.8
15	Bar Turner Building	VOC	1.4	6.1

21	Scrap Bar Cutting	PM PM_{10} SO_2 VOC CO NO_x	0.2 0.2 0.1 0.1 0.3 1.1	0.8 0.8 0.1 0.3 1.0 4.8
22	Slag Processing	PM PM_{10}	n/a n/a	4.5 4.5
23	Hydraulic Fluid Usage	VOC	3.6	15.8
24	Painting/Labeling of Steel Bars	VOC Methyl Ethyl Ketone*	N/A 0.41	5.7 2.0
25	Bar Turner Building 2	VOC	1.4	6.1
26	Car Bottom Furnace	PM PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.5 1.5	0.2 0.2 0.1 0.2 1.9 6.6
27	Bar Turner Building 3	VOC	1.4	6.1
29	Caster Steam Exhaust 2	PM PM_{10}	1.3 1.3	5.6 5.6
30	53 MMBtu/hr Natural Gas Fired Boiler	PM PM_{10} SO_2 VOC CO NO_x	0.4 0.4 0.1 0.3 4.5 5.3	1.8 1.8 0.2 1.3 19.5 23.2

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

SECTION III: PERMIT HISTORY

Minor Source **Permit 693-A** was issued on October 1, 1982, with emissions of each criteria pollutant permitted at less than 100 tons per year.

Permit 693-AR-1 was issued on January 3, 1990, allowing the installation of a new ladle furnace.

PSD **Permit 693-AR-2** was issued on October 28, 1993. This permit was a result of testing on the baghouse exhaust which showed emissions greater than 100 tons per year for NO_x, PM/PM_{10}, CO, and SO_2. The minor source baseline date was triggered by the submittal of that PSD application. The minor source baseline date is January 8, 1993 for Sebastian County.

On April 5, 1994, permit **693-AR-3** was issued so that automated steel bar deburring equipment could be installed. This permit was a minor modification. A collection system, consisting of both a cyclone and a fabric filter, was installed to control emissions from this source. This is an 8,500 cfm system. The manufacturer's estimated emission rate is 0.0025 gr/scfm or 0.18 lb/hr.

On January 27, 1995, **Permit 693-AR-4** was issued for the installation of a spark arrestor in the Ladle Metallurgical Furnace duct. An investigation in the cause of failing a recent particulate test of the baghouse revealed that an increased amount of spark carry over from the LMF was damaging the filter media in the baghouse. None of the emission rates were affected by that modification.

Permit 693-AOP-R0 was issued on February 18, 1998, and allowed the installation and operation of a second baghouse to control emissions from the melt shop, increasing steel production from 74 to 86 tons per hour, incorporating minor emission sources previously not permitted (heat treat #3 and bar turner #2), and revising emission factors based on continuous emission monitoring data and changes to AP-42 for natural gas combustion. This permit was the second PSD permit and the first Title V permit for this facility. A summary of the PSD review for permit 693-AOP-R0 is presented below.

Summary of PSD review for air permit 693-AOP-R0

The following describes the PSD review required for issuance of Permit 693-AOP-R0. These issues are presented here for information purposes only, and are not part of this modification.

MacSteel is considered a major stationary source under the PSD regulations. Permit 693-AOP-R0 included sulfur dioxide (SO_2), carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter (PM/PM_{10}), and lead (Pb) emission increases of 185.3 tpy, 308.7 tpy, 47.6 tpy, 75.7 tpy, 0.68 tpy, respectively. These increases exceeded the PSD significance levels and were subject to PSD review. Emission increases of 23.3 tpy volatile organic compounds (VOC) were below the significance level, therefore, VOC emissions were not subject to PSD review.

The PSD regulations mandate that a case-by-case Best Available Control Technology (BACT) analysis be performed on all sources which were directly associated with enhancing the mill's steel production and heat treat furnace #3. The BACT determination is summarized below.

Summary of BACT Determination			
Source	Description	Pollutant	Control Technology
SN-01 SN-12	Electric Arc Furnaces (2 baghouses)	PM/PM_{10}	Fabric Filter
		SO_2	Use of high quality scrap
		CO	Side draft hood system
		NO_x	Oxyfuel natural gas burners
		Pb	Fabric Filter
SN-06	Caster	PM/PM_{10}	Routed to baghouse
SN-11	Heat Treat Furnace #3	PM/PM_{10}	Combustion of natural gas
		SO_2	Combustion of natural gas
		CO	Good combustion practices
		NO_x	Ultra low-NO_x burners
SN-22	Slag processing and storage piles	PM/PM_{10}	Water spray on transfer points and slag dumping area
SN-07	Ladle Metallurgy Furnace (LMF)	PM/PM_{10}	Routed to Fabric Filters (SN-01 and SN-12)

Permit 693-AOP-R1 was issued on December 11, 1998. It consisted of adding a car bottom furnace (heat input of 5 MMBtu/hr), changing the hydraulic fluid used from ethylene glycol to diethylene glycol, including an alternative status inspection procedure for the melt shop baghouses, and adding sources to the insignificant source list.

Permit 693-AOP-R2 was issued on December 4, 2000. It included removal of the hourly steel production limit of 86 tons per hour which was justified by the requirement to operate continuous emission monitors on the two EAF baghouses. The permit also included newly calculated emission limits for affected sources using an hourly production rate of 92 tph. The annual steel production limit remained unchanged. The increase of steel production to 92 tph resulted in a facility wide increase of 0.1 tpy of PM/PM_{10}, 0.3 tpy of SO_2, 0.3 tpy of NO_X, 4.6 tpy of CO, 4.5 tpy of VOC, and 0.3 tpy of HAPs.

Permit 693-AOP-R3 was issued on March 9, 2001. It included the addition of two new buildings to be located on the property immediately south of the existing facility. These buildings include one new source, Bar Turner Building #3, and one insignificant source, bar straighteners. The potential to emit for the new source was 5.6 tons per year of VOC.

Permit 693-AOP-R4 was issued on March 27, 2002. In this modification MacSteel was permitted to construct a second steam exhaust (SN-29) for the caster area to remove excess steam within the building. The current steam exhaust (SN-14), which is currently listed as an insignificant activity, must also be included in the permit as a source. The annual emission for SN-14 was 0.66 tpy, and the annual emission for SN-29 was 5 tpy. The permittee maintained all limits and recordkeeping requirements as stated in the past permit.

Permit 693-AOP-R5 was issued on August 7, 2003. In this permitting action MacSteel was issued its first renewal to the original Title V Operating Permit. A Compliance Assurance Monitoring (CAM) Plan was submitted, approved, and incorporated into the conditions of the permit. The CAM affected sources at this facility were the Melt Shop Baghouses (SN-01 and SN-12).

Other permit actions included were incorporation of two minor modifications approved on November 12, 2002, and January 31, 2003. The first of these minor modifications allowed the installation and operation of a 53 MM Btu/hr natural gas-fired boiler (SN-30). Limited operation of SN-30 was required as not to exceed Title V minor modification criteria. The second minor modification allowed the use of landfill gas at the Heat Treat Furnace (SN-04). Both of these permit changes caused increased emissions in the form of the typical products of combustion.

A modification was also included in this permit action. This modification allowed the unlimited use of the boiler allowed by the minor modification approved on November 12, 2002 (installation of SN-30 mentioned above). Unlimited operation of SN-30 did not trigger PSD review.

Permit 693-AOP-R6 was issued on August 24, 2004. This modification incorporated provisions approved in a minor modification acceptance letter dated February 14, 2004. It allowed the permittee to melt up to 15,000 lbs of turnings or machine shop borings per heat of steel at the Melt Shop (SN-01 and SN-12). Preliminary test runs, approved by the Air Division – Enforcement Branch, have shown that emissions are not affected by this change in operation. CEMS operated at the affected sources will continue to be operated to further demonstrate compliance with permitted limits.

SECTION IV: SPECIFIC CONDITIONS

SN-01 and SN-12
Melt Shop Baghouse 1 and 2

Source Description

Scrap iron and steel and scrap substitutes are received by rail and truck. After unloading, the scrap is either stored in stockpiles or loaded into furnace charging buckets. The scrap, lime, alloys, and coke/coal are charged into one of two electric arc furnaces (EAFs). Lime and carbon (fluxes) are handled and stored in bulk form. Charging and melting cycles are staggered between the furnaces. There are no limitations which would preclude tapping both furnaces at the same time or charging one furnace while tapping the other. The combined capacity of the two EAFs is 92 tons of steel per hour and the operating hours are limited to 7,344 hours per year per furnace. The two EAFs are subject to NSPS-AAa (See Appendix A).

The two EAFs operate in a batch mode. During normal operation, cold scrap metal, scrap substitutes, coke/coal, and lime are charged into the brick-lined EAFs (15 feet in diameter) powered by transformers and auxiliary natural gas-fired oxy fuel burners. The charging and melting cycles are staggered between the furnaces. After charging the furnace(s), the lid or roof of the EAF(s) is swung into position and a large electrical potential is applied to the carbon electrodes. The combination of the heat from the arcing process, chemical energy from oxygen lances, and the heat from the auxiliary burners melt the scrap into molten steel. As the scrap begins to melt, the temperature of the exhaust gas from the EAF(s) increases appreciably. When the melting is complete and oxygen lancing is performed, the temperature of the molten steel can approach 3,000°F. This operational cycle is repeated approximately every 90 minutes.

The capture system for exhaust gases from the EAFs is comprised of furnace side draft hoods and an overhead roof exhaust system via a canopy hood. The side draft hood on each furnace encompasses the electrodes and other furnace roof penetrations. Side draft hoods were installed as original equipment in 1984 to allow the furnaces to operate under positive pressure which prevents reoxidation of the steel during the refining process. These hoods are the primary emission capture mechanism during furnace roof-on operations. During roof-off operations (charging and tapping) and cooling of the captured gases from the side-draft hoods, emission control is accomplished by regulating the gas flow rate through the roof canopies which enables the system to control the exit gas temperature to the baghouse inlets.

After the steel is melted, it is refined at the ladle refining station through the addition of alloys and reagents, along with heat. Emissions from the refining process are collected by a side-draft hood and ducted through a spark arrestor and into the melt shop baghouse (SN-01). Fugitive emissions from the refining process are collected by melt shop baghouses (SN-01 and SN-12). Refined steel is conveyed to a stir station where argon gas is added to the bottom of the ladle. At this stage, additional alloys can be added. The steel is then conveyed to a vacuum arc degasser (SN-13) where dissolved gases are removed through application of a vacuum. Emissions from the stir station and vacuum arc degasser (door open) are collected with hoods and ducted to the

baghouses. Emissions from the vacuum arc degasser are collected by the steam injector when the door is closed.

After the temperature and composition of the molten steel is adjusted at the vacuum degasser, the molten steel is transferred to the continuous caster. The molten steel is poured from the ladle into a tundish, which funnels the molten steel into a mold. The steel solidifies as it passes through the water-cooled mold, providing immediate cooling of the outer skin. At this point, the center of the steel is still molten. The caster produces round bars. Emissions from the continuous caster are captured by the canopy hood and ducted to the melt shop baghouses (SN-01, SN-12). This hood is estimated to capture 100% of emissions generated at the caster. Exhausts from the caster cooling zones and caster hot saws are released to the atmosphere through a vent. To estimate PM emissions from this vent, a stack test was conducted. The results of the test indicated a maximum emission rate, adjusted for 92 ton/hr production, of 0.16 lb/hr. Thus, the caster cooling zone and hot saw exhaust vent are considered insignificant sources.

Molten metal is tapped from the EAFs into a ladle and transported to the ladle metallurgy furnace (LMF). The LMF station is used primarily to adjust the composition and temperature of the steel. The processes conducted at the LMF station include the injection/addition of alloys, fluxes, and non-ferrous metals. Emissions from the LMF station can be either gaseous or in particulate form. Particulate emissions are generally attributed to dust associated with fluxes, slag, and various additives. Gaseous emissions are generally associated with the oxidation of metals. Emissions from the LMF are captured by the side-draft hood and ducted to the EAF baghouse (SN-01). Fugitive emissions from the LMF are collected by melt shop baghouses (SN-01 and SN-12).

MacSteel utilizes four natural gas-fired tundish preheaters, each with a maximum heat input capacity of 1.2 MMBtu/hr. These units are used to raise the temperature of the tundishes prior to transfer of molten steel from the ladles. Low-NOx burners are used in the preheaters to minimize emissions of nitrogen oxides. The tundish preheaters emit natural gas combustion by-products which are captured by the roof canopy system and ducted to the EAF baghouses (SN-01 and SN-12).

Ladle preheaters. MacSteel incorporates three natural gas-fired ladle preheaters, two with a maximum heat input of 9 MMBtu/hr and one with a maximum heat input capacity of 5.5 MMBtu/hr. These units are used to raise the temperature of the ladles prior to transfer of molten steel from the ladles. Low-NOx burners are used in the preheaters to minimize emissions of nitrogen oxides. Emissions from these preheaters are vented to the melt shop baghouses and are addressed in the section discussing emission points SN-01 and SN-12.

Ladle Dryout, Refractory Dryers. MacSteel utilizes numerous ladles and tundishes. Each ladle or tundish requires a certain amount of refractory brick. After time, the refractory lining in the ladles and tundishes needs to be replaced. The removal of the refractory lining is accomplished using jack hammers. This operation is associated with the emission of small amounts of particulate in the building. As such refractory removal is considered an insignificant activity.

After removal of the old refractory lining, new refractory is applied and cured. The mill incorporates one (1) natural gas-fired ladle dryout with a maximum heat input capacity of 1.2 MMBtu/hr and six (6) natural gas-fired refractory dryers each with maximum heat input capacity of 1.2 MMBtu/hr.

Emissions from the Caster, Ladle Metallurgy Furnace (LMF), Tundish Preheaters, Ladle Dryout, Refractory Dryers, and Ladle Preheaters, are vented to the EAF baghouses (SN-01 and SN-12).

The dust collection equipment for the two EAFs, LMF, caster, stir station, vacuum arc degasser, and other melt shop emission sources consists of two multi-compartment, positive pressure baghouses (SN-01 and SN-12). Each module contains multiple filter bags, with all necessary reverse-air bag cleaning mechanisms, flow control, and material transfer and removal equipment. The design of the baghouses allows for on-line maintenance and cleaning. The air-moving mechanism for the systems consists of multiple blowers. SN-01 has a single exhaust stack, while SN-12 has a roof monitor vent along the length of the roof.

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 through compliance with Specific Conditions 15 and 20. [Regulation 19, §19.501 et seq., effective December 19, 2004 and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
SN-01	PM_{10}	27.4	100.3
	SO_2	90.3	331.6
	CO	421.4	1547.4
SN-12	NO_x	43.9	161.1
	Pb	0.3	1.0

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 20. [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	Pollutant	lb/hr	tpy
SN-01	Manganese	0.93	3.41
	Cadmium	0.01	0.03
SN-12	Arsenic	0.01	0.01

3. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 5. [§19.901 and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
SN-01	PM	27.4	100.3
SN-02			

4. The combined emissions from SN-01 and SN-12 shall not exceed the values in the following table as measured by EPA Reference Method 25A. [§19.501 and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
SN-01	VOC	12.0	43.9
SN-12			

5. The permittee shall measure the particulate emissions from the melt shop baghouse SN-01 using method 5, and the melt shop baghouse SN-12 using method 5D, on or before April 26, 1998, and every six months thereafter. The sampling time and sample volume for each run shall be at least 4 hours and 4.50 dscm (160 dscf). Each test shall consist of three runs. The test runs on both baghouses shall be conducted simultaneously, unless inclement weather interferes. To demonstrate compliance with the particulate limit (0.0018 gr/dscf and 27.4 lb/hr), the concentration of particulate matter shall be determined using the following equation:

$$CST = \frac{\{C_1*Q_1 + C_2*Q_2\}}{\{Q_1+Q_2\}}$$

where: CST= average concentration of particulate matter
C_1 = concentration of PM from SN-01 (gr/dscf)
C_2 = concentration of PM from SN-12 (gr/dscf)
Q_1 = flow rate of stack gas from SN-01 (dscf/hr)
Q_2 = flow rate of stack gas from SN-12 (dscf/hr)

The permittee shall notify the Department, in writing, at least 15 days prior to performing the tests. If the permittee has demonstrated consistent compliance with the PM/PM_{10} emission limits, the permittee shall be required to measure the particulate emissions from SN-01 and SN-12 on an annual basis. Consistent compliance shall be demonstrated if the last three successive stack tests are within emission limits. [§19.901, §19.304, 40 CFR Part 64, 40 CFR Part 52, Subpart E, and 40 CFR 60.275a(e)]

6. The average concentration of particulate matter from SN-01 and SN-12 calculated using the equation in Specific Condition 5 (CST) shall not exceed 0.0018 gr/dscf. [§19.501, §19.901, and 40 CFR Part 52, Subpart E]

7. The permittee shall measure the VOC emissions from the melt shop baghouse SN-01 using method 25A, and the melt shop baghouse SN-12 using method 25A, on or before April 26, 1998, and every six months thereafter. The test runs on both baghouses shall be done simultaneously. The permittee shall notify the Department, in writing, at least 15 days prior to performing the tests. If the permittee has demonstrated consistent compliance with the VOC emission limit, the permittee may measure the VOC emissions from SN-01 and SN-12 on an annual basis. Consistent compliance is maintained when the last three successive stack tests are within emission limits. [§19.702, 40 CFR Part 64, and 40 CFR Part 52, Subpart E]

8. The permittee shall not emit any gases from SN-01 or SN-12 with an average opacity of 3% or greater, as measured by EPA Reference Method 9. Visible emission observations shall be conducted on SN-12 at least once-per-day by a certified visible emission observer when at least one of the furnaces is operating in the melting and refining period, unless inclement weather prevents. It shall be noted on the observation form that the readings were taken during the melting and refining period. These observations shall be performed for at least three 6-minute periods. [40 CFR 60.272a(a)(2), §19.901, §19.304, 40 CFR Part 64, and 40 CFR Part 52, Subpart E]

9. The permittee shall not emit any gases from the melt shop due solely to the operations of the EAFs with an opacity of 6% or greater, as measured by EPA Reference Method 9 during the particulate testing. The permittee shall be responsible for these observations and shall keep records showing compliance with this condition. These observations shall be performed for at least three 6-minute periods. [40 CFR 60.272a(a)(3), §19.901, §19.304, 40 CFR Part 64, and 40 CFR Part 52, Subpart E]

10. The permittee shall not emit any gases from the dust handling systems servicing the EAF baghouses with an opacity of 10% or greater. The permittee shall conduct weekly observations of the opacity from the dust handling system, and keep a record of these observations. If visible emissions are detected, then the permittee shall conduct three 6-minute opacity readings on the equipment where visible emissions were observed in accordance with EPA Reference Method 9. The results of these observations shall be kept on site and made available for inspection upon request. For the purposes of this condition, the dust handling system consists of the baghouse dust hoppers, the dust-conveying equipment, any central dust storage equipment, the dust-treating equipment (e.g., pug mill, pelletizer), dust transfer equipment (from storage to truck), and any secondary control devices used with the dust transfer equipment. [40 CFR 60.272a(b), §19.304, 40 CFR Part 64, and 40 CFR Part 52, Subpart E]

11. The permittee shall install, calibrate, maintain, and operate a continuous monitoring system for the measurement of the opacity of emissions discharged into the atmosphere from SN-01. The opacity shall not exceed 3% based on a 6-minute average. This monitor shall be operated in accordance with the *Arkansas Continuous Emission Monitoring Systems Conditions* as found in Appendix C. [40 CFR 60.273a(a), 40 CFR Part 64, and §19.304]

12. The permittee shall perform monthly operational status inspections of the equipment that is important to the total capture system. This inspection shall include observations of the physical appearance of the exterior of the capture system for the presence of holes or leaks, on a monthly basis. The permittee shall also continuously monitor the flow rates to the two EAF baghouses using existing flow monitors which were installed on the baghouses. The permittee shall use these flow rates to continuously determine if fan erosion, dust accumulation on the interior of the ducts, or damper positions is unacceptable. For the purposes of this condition, unacceptable operation shall be defined as flow rates less than the baseline flow rate determined during the semiannual particulate testing. Operation at flow rates during any period less than the most recently determined baseline flow rate may be considered unacceptable operation and maintenance of the capture system. Operation at such values shall be reported to the Department semiannually. [40 CFR 60.274a(d), 40 CFR 60.276a(c), 40 CFR Part 64, and §19.304]

13. The permittee shall, during any emission testing on the baghouses, monitor and record the following information for all heats covered by the tests:

    a. Charge weights and materials, and tap weights and materials.
    b. Heat times, including start and stop times, and a log of process operation, including periods of no operation during testing.
    c. Control device operation log.
    d. Continuous monitor and Reference Method 9 data.

    [40 CFR 60.274a(h), 40 CFR Part 64, and §19.304]

14. The permittee shall install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate through both baghouses (SN-01 and SN-12). The flow monitors may be installed in any appropriate location such that reproducible flow rate monitoring will result. The flow rate monitoring devices shall have an accuracy of ±10% over its normal operating range and shall be calibrated according to the manufacturer's instructions. This monitor shall be operated in accordance with the *Arkansas Continuous Emission Monitoring Systems Conditions* as found in Appendix C. [40 CFR 60.274a(b) §19.304]

15. The permittee shall install, calibrate, and maintain a continuous emission monitoring system (CEMS) for each baghouse (SN-01 and SN-12). The CEMS shall measure and record the concentrations of CO, NO_x, and SO_2 leaving each baghouse, simultaneously. Both systems shall be operated in accordance with the *Arkansas Continuous Emission Monitoring Systems Conditions* as found in Appendix C. [§19.703, 40 CFR Part 64, 40 CFR Part 52, Subpart E, and A.C.A §8-4-203 as referenced by §8-4-203 and §8-4-311]

16. The combined CO, NO_x, and SO_2 emissions from SN-01 and SN-12 shall not exceed the values listed in Specific Condition 1. The averaging time for compliance purposes shall be 3-hour rolling averages, such that a new 3-hour average is computed every hour.

Compliance with the tons/year emission rates shall be determined on a monthly basis based on a rolling 12-month total of the CEMS data. The permittee shall submit reports in accordance with General Provision 7. [§19.501 and §19.901 and 40 CFR Part 52, Subpart E]

17. The permittee shall demonstrate compliance with the lead emission limits by either 1) measuring the lead concentration in the baghouse dust then calculating lead emissions by multiplying the measured particulate emissions by the lead concentration percentage in the baghouse dust; or 2) performing stack testing using Reference Method 12, simultaneously on both baghouses. These demonstrations shall be conducted on an annual basis. [§19.702 and 40 CFR Part 52, Subpart E]

18. The permittee shall not exceed 15,000 lbs of turnings or machine shop borings per heat of steel. The turnings/ borings shall contain no free oils. [§19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6]

19. The permittee shall maintain monthly records to demonstrate compliance with the turnings/ borings limit of Specific Condition 18. A daily average shall be used by dividing the total lbs of turnings/ borings melted on a day by the total number of heats performed on that day. Records shall be updated by the 15th day following the month to which they pertain. Records shall be kept on-site, made available to Department personnel upon request, and submitted in accordance with General Provision 7. [§19.705 and 40 CFR Part 52, Subpart E]

20. The permittee shall not exceed 631,584 tons per year of steel production based on a rolling 12-month total. Compliance with this condition shall be demonstrated on a monthly basis by totaling the steel production for the previous 12 months. [§19.901, §18.1004, 40 CFR Part 52, Subpart E, 40 CFR Part 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

21. The permittee shall maintain records on site of the tonnage of steel produced during each month to verify compliance with Specific Condition 20. The permittee shall submit reports in accordance with General Provision 7. [§19.705, §18.1004, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

22. The permittee shall combust only pipeline quality natural gas in the tundish preheaters, ladle dryout, ladle preheaters, and refractory dryers. [§19.901, 40 CFR 70.6, 40 CFR Part 52, Subpart E, and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-02
Reheat Furnace

Source Description

The rolling process is initiated at the reheat furnace and proceeds into the rolling mill. The reheat furnace has a maximum heat input capacity of 45 MMBtu/hr which is supplied by natural gas combustion. Waste gas is pulled through a recuperator and exhausted to a stack. In the furnace, the steel bars are heated to a uniform rolling temperature. The furnace incorporates low-NO_x burners to minimize emissions of NO_x. Good combustion practices are utilized to minimize emissions of CO. The furnace has one exhaust stack, identified as SN-02. This source is not subject to NSPS-Dc because the reheat furnace does not fit the definition of a steam generating unit as defined in the subpart.

Specific Conditions

23. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 26. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.7	2.7
SO_2	0.1	0.2
CO	1.6	6.9
NO_x	6.3	27.6

24. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 26. [§19.901 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	0.2	0.6

25. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance shall be demonstrated through compliance with Specific Condition 26. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
02	5%	§18.501

26. The permittee shall combust only pipeline quality natural gas at SN-02. [Regulation 19, §19.901, 40 CFR Part 52, Subpart E, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 70.6]

SN-03
Boiler

Source Description

MacSteel utilizes a boiler to provide process steam and heat to the mill. The boiler has a maximum heat input capacity of 45 MMBtu/hr which is supplied by natural gas combustion. The boiler has one exhaust stack, identified as SN-03. This source is not subject to NSPS-Dc since it was constructed before June 9, 1989.

Specific Conditions

27. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 31. [Regulation 19, §19.501 et seq. and §19.901 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.7	2.7
SO_2	0.1	0.2
CO	1.6	6.9
NO_x	6.3	27.6

28. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 31. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.7	2.7

29. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 31. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	0.2	0.6

30. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance shall be demonstrated through compliance with Specific Condition 31. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
03	5%	§18.501

31. The permittee shall combust only pipeline quality natural gas at SN-03. [Regulation 19, §19.901, 40 CFR Part 52, Subpart E, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 70.6]

SN-04, SN-05, SN-11
Heat Treat Furnaces

Source Description

MacSteel incorporates three natural gas fired heat treat furnaces with maximum heat input capacities of 36.6, 38.4, and 65 MMBtu/hr, respectively, to relieve structural tension from the steel bars and for chemistry adjustments. Each heat treat furnace has an individual stack; identified as SN-04, SN-05, and SN-11. SN-04 is allowed combustion of up to 50% by volume landfill gas. Heat treat furnaces 1-3 are not subject to NSPS-Dc because these furnaces do not meet the definition of a steam generating unit as defined in this subpart.

Specific Conditions

32. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Conditions 36 and 37. [Regulation 19, §19.501 et seq. and §19.901 and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
04	PM_{10}	0.6	2.3
	SO_2	0.5	2.0
	CO	1.3	5.7
	NO_x	9.6	41.8
05	PM_{10}	0.6	2.3
	SO_2	0.1	0.2
	CO	1.4	5.9
	NO_x	5.4	23.6
11	PM_{10}	0.9	3.9
	SO_2	0.1	0.2
	CO	6.0	26.2
	NO_x	5.0	21.7

33. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Conditions 36 and 37. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
04	PM	0.6	2.3
05	PM	0.6	2.3
11	PM	0.9	3.9

34. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Conditions 36 and 37. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
04	VOC	0.5	2.0
05	VOC	0.2	0.5
11	VOC	0.2	0.8

35. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance shall be demonstrated through compliance with Specific Conditions 36 and 37. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
04	5%	§18.501
05	5%	§18.501
11	5%	§18.501

36. The permittee shall combust only pipeline quality natural gas at SN-05 and SN-11. The permittee shall only combust pipeline natural gas or a mixture of up to 50% by volume landfill gas at SN-04. [Regulation 19, §19.901, 40 CFR Part 52, Subpart E, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 70.6]

37. The permittee shall maintain monthly records demonstrating compliance with the fuel content limits set at SN-04 by Specific Condition 36. These records shall contain the total monthly amounts of both types of fuel consumed at SN-04 and a calculation of the monthly average percent of landfill gas used. These records shall be updated by the 15th day of the month following the month to which the records pertain. A copy of these records shall be kept on site and made available to Department personnel upon request.

These records shall be submitted to the Department in accordance with General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

SN-10
Automated Deburring Line

Source Description

After the bars are cut, an automated deburring line is used to remove burrs from the end of bars and to blunt sharp edges. PM emissions associated with this operation are vented to a cyclone and then to a negative-pressure baghouse.

Specific Conditions

38. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.2	0.8

39. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 20. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.2	0.8

40. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance shall be demonstrated through compliance with Specific Condition 41. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
10	5%	§18.501

41. The permittee shall conduct weekly observations of the opacity from this source. These observations shall be conducted by a person familiar with the facility's visible emissions. If the permittee detects visible emissions in excess of the limit set forth in the above Specific Condition, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements by performing a reading in accordance with EPA Method 9. The permittee shall maintain

records of all observations, the cause of any visible emissions and the corrective action taken. The permittee must keep these records on site and make them available to Department personnel upon request. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-13
Vacuum Tank Degasser-Steam Injector Condenser

Source Description

After steel is refined in the LMF, it is transferred to a stir station and then to a vacuum tank degasser. At the degasser, dissolved gases are removed from the steel through the application of a vacuum. In the degasser, heat may also be added with electric arcs. Emissions from the degasser are collected by a hood and ducted to the EAF baghouses when the door is open (arcing mode). Exhaust from a steam injector condenser (SN-13) occurs when the door is closed (degassing and arcing under partial pressure modes). Emissions from the steam injector condenser were estimated using stack tests. The emission rates, based upon the tests, and adjusted for maximum operation, are presented in the table below.

Specific Conditions

42. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.6	2.1
SO_2	0.2	0.6
CO	17.2	74.9
NO_x	0.2	0.6

43. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 20. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.6	2.1

44. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance shall be demonstrated through compliance with Specific Condition 45. [40 CFR Part 52, Subpart E]

SN	Limit	Regulatory Citation
10	20%	§19.503

45. The permittee shall conduct weekly observations of the opacity from this source. These observations shall be conducted by a person familiar with the facility's visible emissions. If the permittee detects visible emissions in excess of the limit set forth in the above Specific Condition, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements by performing a reading in accordance with EPA Method 9. The permittee shall maintain records of all observations, the cause of any visible emissions and the corrective action taken. The permittee must keep these records on site and make them available to Department personnel upon request. [Regulation 19, §19.705 and 40 CFR Part 70.6]

SN-15, SN-25, and SN-27
Bar Turner Buildings

Source Description

Operations including bar turning, bar polishing, and bar buffing are conducted in the bar turning buildings. These operations require the use of soluble oils and mineral oils. VOC emissions associated with Bar Turning Buildings #1 and #2, SN-15 and SN-25, exhaust through a fan into the heat treat building and then through a roof exhaust fan which exhausts to the atmosphere. VOC from Building #3, SN-27, will exhaust from the roof monitor.

Specific Conditions

46. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
15	VOC	1.4	6.1
25	VOC	1.4	6.1
27	VOC	1.4	6.1

SN-21
Scrap Bar Cutting

Source Description

Scrap steel bars from the caster, rolling mill, finishing line, straighteners, and bar turner are torch-cut into smaller pieces (approximately 3 foot lengths) for recharging in the EAFs. The steel bars are transported to the cutting area via rail cars. The bars will be loaded onto a roller table. The cutting is accomplished using two hand-held natural gas/oxygen torches.

Emissions of criteria pollutants (primarily PM) occur due to the torch cutting. A 30,000 CFM baghouse will be used to control particulate emissions. To estimate emissions of pollutants attributable to the natural gas combustion, the maximum combustion of 60 cubic feet per minute per torch was used in conjunction with AP-42 factors for natural gas combustion. The particulate emissions were calculated using the grain loading capacity of the baghouse in conjunction with the maximum rated flow rate.

Specific Conditions

47. The permittee shall not exceed the emission rates set forth in the following table. These emission rates were calculated using the maximum heat input capacity of the torches and assuming continuous operation. The particulate emissions were calculated using an uncontrolled emission factor. However, this source is controlled by a baghouse; therefore the particulate emission rate is conservative and requires no records to demonstrate compliance with the particulate emission limit. Compliance with this condition shall be demonstrated by complying with Specific Condition 50. [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	0.3
CO	0.3	1.0
NO_x	1.1	4.8

48. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition 50. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.2	0.8

49. The opacity from SN-21 shall not exceed 5%, as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated through compliance with Specific Condition 50. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by A.C.A. 8-4-304 and §8-4-311]

50. The permittee shall not exceed a total heat input capacity of 10.8 MMBtu/hr at SN-21. The permittee shall fire only pipeline quality natural gas at SN-21. [Regulation 18, §18.1004, Regulation 19, §19.705, 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]

SN-22
Slag Processing

Source Description

Slag generated during the melting and casting operations is poured on the ground in contained areas within the steelworks building under the dust collecting roof canopies. The hot slag is dug out of these areas and deposited in large dump trucks for transportation to the slag processing area. Emissions from the dump truck loading area are controlled by overhead water sprays. Approximately 75 percent of the slag is returned to the scrap storage area as reclaimed steel. The remaining 25 percent is crushed and passed by a magnet to remove steel fines. The remaining material is conveyed to a screening station and sorted by size. At the slag processing area, the slag is first dumped and allowed to cool. During this time, water is continuously sprayed on the slag. When sufficiently cooled, the wet slag is loaded out of the slag pit/cooling area and is placed into a feeder. Next, the slag is screened to remove various metallics and additionally screened for size separation. This screening process is associated with a number of belt-type conveyors. Water sprays are used to minimize PM emissions from all open-air slag processing operations. The sprays have an estimated efficiency of 95 percent. Fugitive dust generated during the "dig out" is contained and collected via building and roof canopies.

To estimate emissions associated with the dumping of slag at the on-site slag processing area, the AP-42 emission factor (Section 12.5, Table 12.5-4) of 0.026 lbs/ton was used in conjunction with the maximum annual slag throughput of 85,780 tpy. To calculate emissions associated with the wind erosion on both slag pits and processed slag piles, the equation presented in "*Control of Open Fugitive Dust Sources*" was used. The silt content represented the default value of 5.3 for the iron and steel industry. To calculate PM emissions associated with the load out of slag from the slag pits to the slag processing feeder, the AP-42 emission factor for material handling was used. In this case, a climatological average wind speed of 8.2 mph was used in conjunction with the maximum annual slag throughput of 85,780 tpy. Finally, to estimate PM emissions associated with the various slag processing activities (i.e., various conveyors and screens), AP-42 factors (Section 12.5.4 for feeder and conveyors and Section 11.19.1 for screening operations) were used. Further, because a water spray is used on each of these unit operations, a 70 percent particulate control efficiency was assumed.

Specific Conditions

51. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition 55. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	N/A	4.5

52. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition 55. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	N/A	4.5

53. The opacity from this source shall not exceed 20%, as measured by EPA Reference Method 9. This source shall include slag dumping, wind erosion of slag pits and processed slag piles, slag loadout to feeder for subsequent processing, slag processing including various conveying and sizing operations, and vehicle/equipment traffic on unpaved roads. Compliance with this condition shall be demonstrated through compliance with Specific Condition 54. [Regulation 19, §19.503, §19.901 and 40 CFR Part 52, Subpart E]

54. The permittee shall use water sprays at this source at all times that slag is being processed. [Regulation 19, §19.901 and 40 CFR Part 52, Subpart E]

55. The permittee shall not process more than 85,780 tons of slag per year based on a rolling 12 month total. [Regulation 19, §19.901 and 40 CFR Part 52, Subpart E]

56. The permittee shall keep records of the amount of slag processed each month and each 12 month period. These records shall be kept on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

SN-23
Hydraulic Fluid Usage

Source Description

The mill utilizes various hydraulic fluids. One such fluid contains diethylene glycol which is not an air toxic, is used in equipment in the melt shop. The diethylene glycol additive serves to minimize the risk of fires or explosions in this equipment.

Based on the estimated maximum usage of the hydraulic fluid, it is estimated that maximum annual emissions of VOC from hydraulic fluid usage is approximately 15.8 tons per year.

Specific Conditions

57. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Condition 58. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	3.6	15.8

58. The permittee shall, on a 4 quarter rolling sum basis, calculate the VOC emissions by taking the amount and VOC content of the fluid used and subtracting the amount and VOC content of the fluid sent for disposal during that same time frame. The amount not accounted for shall be considered emissions. These records shall be kept on site and made available to Department personnel upon request. A copy of the records shall be submitted in accordance with General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

SN-24
Miscellaneous Process-Related Painting/Labeling

Source Description

A color coding is painted on each steel bar using aerosol spray paint. The maximum annual paint use at the mill is estimated to be approximately 15,000 lbs. The volatile portion of the paints and carrier solvents can be released to the atmosphere during their application. To estimate these emissions, the VOC and HAP content of the paint and solvents was used in conjunction with the maximum annual throughput of paint and solvent. The lb/hr emissions are based on a conservative 2000 hrs/year of operation.

Specific Conditions

59. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 61. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	7.4	7.4

60. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 61. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Methyl Ethyl Ketone	2.0	2.0
Methyl Isobutyl Ketone	0.3	0.3
Toluene	0.3	0.3
Xylene	1.0	1.0
Ethyl Benzene	0.2	0.2
Hexane	0.01	0.01
Tetrachloroethylene	2.0	2.0
Methylene Chloride	1.5	1.5

61. The permittee shall keep the MSDS sheet for the paints being used on site and available for inspection by Department personnel upon request. The permittee shall maintain

monthly records to demonstrate compliance with both the VOC and HAP emission limits set by Specific Conditions 58 and 59. These records shall contain the total monthly usage of each paint and solvent, the VOC and HAP contents, and calculations of the total monthly amount of VOCs and HAPs used. The permittee shall maintain a rolling twelve month total of the VOC and HAPs used at this source. These records shall be updated by the 15th day of the month following the month to which the records pertain. A copy of these records shall be kept on site and made available to Department personnel upon request. Records shall be submitted in accordance with General Provision 7. [§18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

62. The permittee shall not use any paint or solvent that contains a HAP not listed in Specific Condition 60. Compliance with this condition shall be demonstrated by keeping the MSDS sheet for the paint and solvent being used on site and available for inspection by Department personnel upon request. [§18.1004 and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-26
Car Bottom Furnace

Source Description

MacSteel operates a car bottom furnace. The furnace is needed for specialized heat treating of steel bars. The furnace is fired with natural gas and has a maximum heat input rate of 5 MMBtu/hr. The car bottom furnace will emit natural gas combustion by-products to the air. To estimate emissions of sulfur dioxide, VOC, CO, and PM, the maximum hourly heat input capacity was multiplied by AP-42 factors (March, 1998). An estimate of nitrogen oxides was provided by the vendor. All emission rates are based on maximum capacity and continuous operation.

Specific Conditions

63. The permittee shall not exceed the emission rates set forth in the following table. The emission rates are based on the maximum physical capacity of the furnace and are assumed to represent worst case. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.2
SO_2	0.1	0.1
VOC	0.1	0.2
CO	0.5	1.9
NO_x	1.5	6.6

64. The permittee shall not exceed the emission rates set forth in the following table. The emission rates are based on the maximum physical capacity of the furnace and are assumed to represent worst case. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.1	0.2

65. Visible emissions from this source shall not exceed 5% opacity as measured by EPA Reference Method 9. Compliance shall be demonstrated by burning only natural gas as fuel at this source. [Regulation 18, §18.501, Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR Part 70.6]

SN-14 & SN-29
Caster Steam Exhaust No. 2

Source Description

After the temperature and composition of the molten steel is adjusted to the vacuum degasser, the molten steel is transferred to the continuous caster (SN-06). The molten steel is poured from the ladle into a tundish, which funnels the molten steel into a mold. The steel solidifies as it passes through the water-cooled mold, providing immediate cooling of the outer skin. At this point, the center of the steel is still molten. The continuous caster produces round bars. Emissions from the caster are captured by the canopy hood and ducted to the melt shop baghouses (SN-01, SN-12). Exhausts from the caster cooling zones and caster hot saws are released to the atmosphere through a vent (SN-14) and (SN-29).

Specific Conditions

66. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 20. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
14	PM_{10}	0.3	0.8
29	PM_{10}	1.3	5.6

67. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through compliance with Specific Condition 20. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
14	PM	0.5	0.8
29	PM	1.3	5.6

68. Visible emissions from this source shall not exceed 20% opacity as measured by EPA reference method 9.

SN-30
Natural Gas Fired Boiler

Source Description

MacSteel utilizes a boiler to provide process steam and heat to the mill. The boiler has a maximum heat input capacity of 53 MMBtu/hr which is supplied by natural gas combustion. The boiler has one exhaust stack, identified as SN-30. This source is subject to 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units* (See Appendix B).

Specific Conditions

69. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 72. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.4	1.8
SO_2	0.1	0.2
VOC	0.3	1.3
CO	4.5	19.5
NO_x	5.3	23.2

70. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 72. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.4	1.8

71. Visible emissions from this source shall not exceed 5% opacity as measured by EPA Reference Method 9. Compliance shall be demonstrated through compliance with Specific Condition 72. [Regulation 18, §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

72. The permittee shall only fire pipeline quality natural gas at this source. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

73. The permittee shall comply with all applicable provisions of 40 CFR Part 60, Subpart A – General Provisions and Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*. Applicable provisions of Subpart Dc include, but are not limited to the following:

    a. Pursuant to §60.48(c)(a), the owner or operator shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup. This notification shall include the design heat input capacity of the boiler and identification of fuels (natural gas only) to be combusted in the affected facility.

    b. Pursuant to §60.48(c)(g) and (i), records of the amounts of fuel combusted each day must be kept for SN-30. These records shall be kept on site for two years following the date of such records.

[Regulation 19, §19.304 and 40 CFR Part 60, Subpart Dc]

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Quanex Corporation - MacSteel Division 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.

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]

Title VI Provisions

7. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [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.

8. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]

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.

9. 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.

10. If the permittee performs a service on motor (fleet) vehicles when this service involves 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.

11. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.

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 April 21, 1998, and October 11, 2000.

Description	Category
Lab etch room (0.075 tpy HCl maximum emission rate) Scale water cooling tower (water vapor emissions only) Clean water cooling tower #1 (water vapor emissions only) Clean water cooling tower #2 (water vapor emissions only) Caster water cooling tower (water vapor emissions only) EMS cooling tower (water vapor emissions only) Lime silos (2) (0.4 tpy maximum PM emission rate) Gasoline storage tanks (2 @500 gal) Kerosene storage tank (1 @500 gal) Waste oil tank (1 @ 1,500 gal) Waste oil tank (2 @ 5,000 gal) Bleach 15% storage tank (1,500 gal) Diesel tank (1 @1,500 gal) Diesel tank (1 @10,000 gal) Hydrogen peroxide storage tank (1,500 gal) Poly-aluminum chloride tank (1 @1,500 gal) Phosphate treatment tanks (2 @1,500 gal) Propane tank (1 @1,000 gal) Rolling mill operations including descaler, pinch roll, ten-stand reducing mill, nose-shear, three-stand sizing blocks, roughing stands and hot saws (minimal emissions of PM due to water spray) Ladle/tundish refractory removal/application (insignificant emissions) Scale pits (insignificant emissions) Settling ponds (insignificant emissions) Ladle/tundish dumping (performed in melt shop routed to baghouses) Bar straighteners (minimal emissions due to water application) Paved roads/parking areas (minimal emissions) Scrap handling (4.35 tpy) Lime transfer system (0.1 tpy) Raw material handling/storage Baghouse dust transfer/unloading operations (1.4 lb/yr) Shot Blasters (2) with fabric filters, rated at 600 CFM each (vents inside building) Parts Washers Small Abrasive Saw with cyclone, rated at 1800 CFM. (vents inside building) Hot Saw for rolled product	A-13
Miscellaneous fuel combustion units including space heaters, process water heaters, air makeup heaters, tundish nozzle preheaters (all less than 1 MMBtu/hr)	A-1
Emergency Lighting Diesel Generator Emergency Water System Diesel Generator Emergency Diesel Pumps (3)	A-12

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.

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 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 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 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]