ARKANSAS
ENERGY & ENVIRONMENT

June 29, 2023

Via email to: mathisjames@firestonebp.com & First Class Mail

Alex Mathis
Senior Environmental Engineer
Holcim Solutions and Products US, LLC
1406 Highway 371 N.
Prescott, AR 71857

Re: Notice of Final Permitting Decision; Permit No. 0698-AR-29

Dear Mr. Mathis,

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

Holcim Solutions and Products US, LLC
1406 Highway 371 North
Prescott, AR 71857

Permit Number: 0698-AR-29

Permitting Decision: approval with permit conditions as set forth in final Permit No. 0698-AR-29

Accessing the Permitting Decision:
https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/0698-AR-29.pdf.

Accessing the Statement of Basis:
https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/0698-AR-29-SOB.pdf.

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

Sincerely,

David Witherow, P.E.
Associate Director, Office of Air Quality, Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure: Certificate of Service
cc: james.mathis@holcim.com

CERTIFICATE OF SERVICE

I, Natasha Oates, hereby certify that the final permit decision notice has been mailed by first class mail to Holcim Solutions and Products US, LLC, 1406 Highway 371 N., Prescott, AR, 71857, on this 29th day of June, 2023.

Natasha Oates

Natasha Oates, AA, Office of Air Quality

DIVISION OF ENVIRONMENTAL QUALITY

MINOR SOURCE AIR PERMIT

PERMIT NUMBER: 0698-AR-29

IS ISSUED TO:
Holcim Solutions and Products US, LLC
1406 Highway 371 North
Prescott, AR 71857
Nevada County
AFIN: 50-00006

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DIVISION OF ENVIRONMENTAL QUALITY'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. § 8-4-101 *ET SEQ.*) AND THE RULES PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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

June 29, 2023
Date

Table of Contents

List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	Arkansas DEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
HAP	Hazardous Air Pollutant
Hp	Horsepower
lb/hr	Pound Per Hour
NESHAP	National Emission Standards (for) Hazardous Air Pollutants
No.	Number
NO_x	Nitrogen Oxide
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate Matter Equal To Or Smaller Than Ten Microns
$PM_{2.5}$	Particulate Matter Equal To Or Smaller Than 2.5 Microns
SO_2	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	Holcim Solutions and Products US, LLC
AFIN:	50-00006
PERMIT NUMBER:	0698-AR-29
FACILITY ADDRESS:	1406 Highway 371 North Prescott, AR 71857
MAILING ADDRESS:	1406 Highway 371 N. Prescott, AR 71857
COUNTY:	Nevada County
CONTACT NAME:	Alex Mathis
CONTACT POSITION:	Senior Environmental Engineer
TELEPHONE NUMBER:	(870) 887-2673
REVIEWING ENGINEER:	Thamoda Crossen
UTM North South (Y):	Zone 15: 3741252.77 m
UTM East West (X):	Zone 15: 462179.42 m

Section II: INTRODUCTION

Summary of Permit Activity

Holcim Solutions and Products US, LLC owns and operates a rubber roofing manufacturing facility located at 1406 Highway 371 North, Prescott, Arkansas, Nevada County. This modification is to add a cooling tower as an A-13 Insignificant Activity.

Process Description

Holcim manufactures rubber roofing materials, and other roofing-related products as well as white rubber tire stock used in the production of white-wall tires. The two primary production areas from which emissions occur are the white line and the black line. The white line yields either finished product or product to be used for white roofing materials. From the black line, output is either finished product, or it is material sent to one of the four secondary product lines: Comerio, Z-Calender, Flashing, or Tape Line.

The tape line produces rubber tape used to seam pieces of rubber roofing together. This line is fairly independent of the other production processes. The compound processed at the black tape line was mixed at the K1 and K2 Banbury mixers.

The following description details the operations that take place for each production line with respect to the air emission sources associated with each, reflecting the changes requested by this modification application. For permitting purposes, the processes have been organized into the following sections:

- Raw materials unloading
- Black line
- White line
- Comerio line
- Z-Calender line
- Flashing line
- Tape line

Raw Materials Unloading

The facility uses carbon black as a raw material. Carbon black is received by rail. Carbon black can be unloaded from the rail cars by a screw auger and transferred to one of three storage tanks by a pneumatic transfer system. Emissions from the pneumatic transfer system are controlled by a dust collector (SN-301A). The carbon black is loaded into one of three storage tanks, Tank No. 111 (SN-201), Tank No. 271 (SN-101A) and Tank No. 272 (SN-101B). Each tank releases emissions by the displacement of air when the tanks are filled. The emissions from the tanks are controlled by fabric filters.

Carbon black can also be unloaded from the rail cars by a pneumatic transfer system into one of two storage tanks, Tank No. 273 (SN-1A) and Tank No. 274 (SN-1B). Emissions from each storage tank are controlled by fabric filters. Emissions from the pneumatic transfer system are controlled by a fabric filter identified as SN-304. Carbon black can also be unloaded from the truck unloading station (SN-304A). Emission from the truck unloading operations will be controlled by a dust collector.

Occasionally, carbon black may have to be transferred back to a railcar from the storage tanks. Typically, this occurs because the carbon black does not meet specifications. In the event that carbon black is transferred back to a railcar, emissions from the transfer are controlled by a fabric filter (SN-17A).

Clay is received by rail car and is unloaded into one of two silos by a pneumatic transfer system. Emissions from the displacement of air when loading the silos and from transferring the clay are controlled by dust collectors located on top of each clay silo (SN-307 and SN-308). Like carbon black, occasionally, a load of clay may be back-loaded onto a rail car. Emissions from the loading of clay are controlled by a dust collector (SN-311) and the emissions from the back loading of clay are controlled by a dust collector (SN-310).

Oil is received by truck or by rail car and is stored in five storage tanks (previously permitted as SN-130, SN-131, SN-132, SN-133, and SN-160). This oil is distributed to operations based on product formulation.

Black Line

The black line operations begin with raw materials, which include carbon black, clay, process oil, polymer, and pigments. The black line operation has two separate process lines, identified as K-1 and K-2. Each process line includes a Banbury mixer with three surge bins. The three surge bins store the carbon black and clay separately.

Carbon black is transferred from storage tanks to a vessel. When the vessel is filled, the carbon black is transferred pneumatically to the surge bins located on the roof. Emissions from the transfer of carbon black from the storage tanks to the vessel are controlled by a dust collector (SN-17B). Clay is transferred from the storage tanks by a pneumatic transfer system directly to a surge bin. Each of the six surge bins (three per Banbury mixer) has an emission point with a dust collector to control pollutant emissions. Each process line, raw material, and source number for the surge bins is outlined below:

Process Line	Raw Material	Source No.
K-1	Carbon Black Carbon Black Clay	SN-18A SN-305 SN-309B
K-2	Carbon Black Carbon Black Clay	SN-18B SN-118 SN-309A

Polymer, oil, and pigments are weighed. Emissions from the weighing operations are also controlled by dust collectors (SN-02A and SN-02B for the K1 line, and SN-102 for the K2 line).

After all of the materials have been weighed, a computer determines if the weight of each of the raw materials is acceptable. If the mix meets the criteria specified in the computer, the raw materials are charged into the Banbury mixer. The mixer tears and pulls the materials, blending them into a rubbery mass. Each Banbury mixer has an inlet and an outlet exhaust, and emissions are controlled by dust collectors (SN-03 for the K1 line, and SN-103 and SN-104 for the K2 line).

After mixing, the mixture drops onto the drop mill. Emissions from the drop mill are controlled by dust collectors (SN-03 for the K1 line, and SN-104 for the K2 line). The drop mill presses the raw product out into a rough sheet. The sheet passes to a slab mill, where it is then pressed into a more refined sheet or slab. The slab rubber passes through a dip tank, where it receives a light coating of a soapy substance called slab dip. Emissions from the slab mill and the dip tank are uncontrolled; they escape the building through a vent fan (previously permitted as SN-09 for the K1 line and SN-109 for the K2 line).

After the slab is dipped, it is cooled and allowed to air dry on a festoon cooler. Then, a wig wag folds the rubber onto a pallet for storage. There are no emissions from the festoon cooler or the wig wag.

Both the K1 and K2 lines make the same product and function in the same manner. Slab rubber may be passed through either line, or both of the Banbury mixers more than once. The number of passes is dependent upon the type or quality of material being produced.

White Line

The white line works in the much the same way as the black line. The difference is that the end product is white slab rubber instead of black. Polymer, pigments, titanium dioxide, and mineral oil are added to the weigh hopper by hand (all raw materials are weighed by hand on the white line). Emissions from the pigment bins on the white line are controlled by a dust collector (SN-202). When the computer approves of the mix, the materials are added to the No. 11 Banbury mixer. The inlet and outlet exhaust from the Banbury mixer are also controlled by the dust collector at SN-202.

After mixing, the raw white rubber drops onto a drop mill where it is pressed into a rough strip. Emissions from the drop mill are discharged through the dust collector at SN-205. The rough strip of white rubber passes through the slab mill, where the rubber is pressed into a refined slab. The rubber then passes through a dip tank. Emissions from the slab mill are vented through the dust collector at SN-205. Emissions from the slab dip tank are uncontrolled (previously permitted as SN-115). The slab rubber is cooled and allowed to air dry on a festoon. After cooling, a wig wag folds the white slab stock onto a pallet.

Comerio Calender Line

One type of black rubber roofing material produced at the facility is a two-ply material made entirely of rubber. This product is produced on the Comerio calender line. Slab material is fed into one of two Troester extruders (SN-13). The Troesters blend the product and increase the temperature by bending and breaking the material. The material is extruded onto a conveyor that delivers the stock to the calender bank. Emissions from the Troesters (SN-13) are uncontrolled.

The Comerio calenders the stock into a wide two-ply sheet of rubber roofing material. Emissions from the Comerio calender are uncontrolled (SN-14). The wide strip of material is picked up by a vacuum conveyor and is then transferred to an assembly machine. The assembly machine splices the strips together. This is accomplished by overlapping the strips, and then pressing the seam with a splice beam. The product is then wound up on a roll. Approximately ten percent of the material from the calender does not meet quality specification and is returned to the extruders for a second pass through. The quality rejects are sent to the shredder to shred the material so that it can be worked into the extruders.

As the product is rolled, it is dusted with mica dust to prevent it from sticking together. A duster applies the mica dust to the product as it is taken up on the roll. The emissions from the duster unit are controlled by a dust collector (SN-07). The product is then wrapped in plastic wrap and stacked on a transfer cart. Dust emissions occur as a result of the wrapping the product in plastic and emissions are controlled by a dust collector (SN-306).

When the transfer cart is loaded, the product is placed in an autoclave to cure. Black line rubber products are cured in one of seven autoclaves. The autoclaves incorporate steam, heat, and pressure to cure the rubber. The process is basically a vulcanization of the product. Two natural gas boilers are used to produce steam for the autoclaves and to provide some steam heat inside the plant. The emissions from the boilers are uncontrolled (SN-16D and SN-16E). Emissions from the autoclaves escape to the atmosphere from a vent on top of each unit. When the pressure and temperature inside of the autoclave reach set points, a valve opens and allows the steam and compressed air to escape. The emissions are uncontrolled (SN-08B-H).

After the curing, or vulcanization process, the rubber is checked for quality. If it passes the quality analysis, it is ready for packaging and shipment.

Z-Calender Line

The other type of black rubber roofing material produced at the facility is a two-ply rubber material that has nylon fabric between the two layers. This product is made on the Z-Calender line.

The Z-Calender line follows much the same process as the Comerio Calender line. However, there is no re-work stock used in the Z-Calender process. Slab stock is fed into one of two Troester extruders (SN-323A and SN-323B). The Troesters blend the slab stock and bring it up to temperature. Emissions from the Troesters are uncontrolled. The stock is extruded from the Troesters to the calender bank. The Z-Calender presses the stock into a two-ply sheet of rubber roofing material. Emissions from the Z-Calender are controlled by a dust collector (SN-114).

Nylon fabric is placed between the two layers, and the product is pressed together. The product then passes over a cooling mill, and is dusted with mica dust by the Z-line duster. Emissions from the Z-line duster are controlled by a collector (SN-302). Bags of mica dust are manually added to the duster. Spilled mica dust is cleaned off the floor with a vacuum cleaning unit, and emissions are controlled by a fabric filter (SN-116).

After the material is pressed and dusted, a wind-up unit rolls the product onto a master roll. Emissions from the wind-up unit are controlled by a dust collector (SN-302). The master roll is sent to a wrapping unit, where it is split into shorter rolls. Emissions from the wrapping unit are controlled by a dust collector (SN-303). The rolls are then sent to one of the autoclaves (SN-08B-H) for curing. After curing, the product is inspected for quality. If the product passes the quality inspection, it is ready for shipment.

Flashing Line

The flashing line produces black rubber flashing material that is used to line the edges of a rubber roof. The flashing material is shipped uncured, because the curing process takes place on the roof after the material has been installed. Slab stock is loaded into a breakdown mill (SN-206) to blend and heat the material. The product then passes onto a feed mill (SN-207), where it is pressed into a rough strip. Emissions from the break down mill and feed mill are uncontrolled. The product then passes through a flashing calender (SN-330), where it is pressed into a strip and laminated onto a polyliner. Emissions from the flashing calender are uncontrolled. The product passes over a cooling mill and is taken up on a wind-up unit. The product passes through a slitter to cut it to its proper size. The strips are wound up and packaged for shipping.

Tape Line

The tape line produces a paper-backed rubber tape used to seam together pieces of rubber roofing. The process involves mixing rubber and oils. Emissions from mixers are controlled by a baghouse (SN-312). There are two storage tanks (previously permitted as SN-314A and SN-314B) that store process oil for the tape line. Emissions from the storage tanks are uncontrolled. After mixing, the product goes to an extruder that forms it into strips. A paper backing is added,

and the tape product is wound up and placed into an electric cure oven (SN-313). The product is split into tape rolls and packaged for shipping.

Miscellaneous Emissions Sources

There are several miscellaneous sources at the facility. Ink and paint are used in various applications throughout the facility. These emissions are uncontrolled (SN-501).

Two primer and laminating machines apply primer to a rubber strip. Two primer and laminating machines apply a primer to the rubber "tape". The primer air dries and the rubber strip "tape" is then rolled up by the laminating machine. VOC emissions from both the primer machines are uncontrolled emissions (SN-315).

The Pre-Tape Line process (SN-316) is the process of applying a primer and tape to the EPDM membrane. This process can be conducted manually by rolling out the EPDM membrane onto the floor, manually rolling a 6 inch wide strip of primer the length of the membrane, and then adhering seam tape to the primed area. Primer can also be applied by threading the EPDM membrane through the pre-tape machine, where the primer is applied, and the seam tape is adhered by an automated process.

EPDM to be recycled is fed into a shredder to reduce larger sheets into smaller pieces which are fed into a grinder to further reduce the size. The ground EPDM is fed into an extruder along with calcium hydroxide (neutralizing agent) and process oil (lubricating agent). The output from the extruder is EPDM "biscuits" which are sprayed with a water based slab dip to prevent sticking. The biscuits are then reused in the EPDM sheet manufacturing process.

The facility has a 277 BHp emergency diesel fire pump (SN-503) and a 150 Hp emergency diesel generator (SN-504) on site in case of emergencies. These engines are subject to the requirements of 40 C.F.R. § 63, Subpart ZZZZ. The facility also has two (2) emergency diesel air compressors (SN-505 and SN-506) to be used as emergency backup in the event of a power failure. These engines are subject to the requirements of 40 C.F.R. § 60, Subpart IIII.

Rules and Regulations

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

Rules and Regulations
Arkansas Air Pollution Control Code, Rule 18, effective March 14, 2016
Rules of the Arkansas Plan of Implementation for Air Pollution Control, Rule 19, effective May 6, 2022
40 C.F.R. § 60, Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*
40 C.F.R. § 63, Subpart ZZZZ - *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*
40 C.F.R. § 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

Total Allowable Emissions

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	23.2	35.3
PM_{10}	23.2	34.5
SO_2	2.4	0.9
VOC	44.2	95.0
CO	13.5	31.8
NO_x	38.3	42.1
Single HAP	N/A	9.5
Total HAPs	5.9	23.9

Section III: PERMIT HISTORY

Permit No. 392-A was issued to Prescott Industrial Products on January 6, 1977. This was the initial air permit for the existing facility. At this time the plant was producing rubber hose for use in automotive radiators and railroad brakes. This permit allowed for the installation of one additional baghouse for improved control of carbon black emissions. The new baghouse was similar to one already in operation at the plant. Two oil fired boilers, each rated at 50,000 lb/hr of steam, were also identified as emission sources at this time. Permitted emission rates were quantified only for the baghouses at 0.017 lb/hr of particulates.

Permit No. 493-A was issued to Prescott Industrial Products on October 25, 1978. This permit was a modification to Permit No. 392-A. This modification allowed for the installation of a facility to unload carbon black from incoming railcars. All transfer points were completely enclosed and routed through a negative pressure system to an existing baghouse for PM emissions control. Emissions associated with the new installation were quantified at 0.1 lb/hr.

Permit No. 698-A was issued to Firestone Tire and Rubber on January 28, 1983. This permit was a modification to Permit No. 493-A. This modification allowed for the conversion of the plant to the manufacture of rubber roofing materials. Emissions in this permit were quantified at 17.87 lb/hr PM, 23.46 lb/hr of hydrocarbons, and 57.0 lb/hr SO_2.

Permit No. 698-AR-1 was issued to Firestone Building Products, Co. on June 20, 1989. This modification was issued in order to allow for the installation of a second rubber roofing production line identical to the existing line. The primary pollutants from the production line were identified as VOC and PM. Additionally, in this modification, the facility was limited to burning only natural gas in the boilers except during periods of natural gas curtailment, at which time No. 6 fuel oil could be used. Usage of No. 6 Fuel Oil was limited to a maximum of 2,000,000 gallons per year. Emissions in this permit were quantified at 23.25 lb/hr PM, 45.8 lb/hr VOC, 0.05 lb/hr SO_2, 10.64 lb/hr NO_x, and 2.66 lb/hr CO.

Permit No. 698-AR-2 was issued to Firestone Building Products, Co. on June 6, 1995. This modification was issued in order to allow for the addition of a tape line, an increase in raw material storage capacity, and the addition of a new bulk transfer system. Limits on the usage of materials and the hours of operation of the boilers were established in this modification to limit annual emissions. Emissions in this permit were quantified at 51.7 tpy PM/PM_{10}, 0.4 tpy SO_2, 82.3 tpy VOC, 15.1 tpy CO, and 60.9 tpy of NO_x.

Permit No. 698-AR-3 was issued to Firestone Building Products, Co. on July 31, 1997. This modification was issued in order to allow for the installation of a primer machine. Emissions were quantified at 51.7 tpy PM/PM_{10}, 0.4 tpy SO_2, 88.7 tpy VOC, 15.1 tpy CO, and 60.9 tpy of NO_x.

Permit No. 698-AR-4 was issued to Firestone Building Products, Inc. on March 23, 1998. This modification was issued in order to allow for an increase in allowable annual usage of inks and cleaners from 185 gallons per year to 370 gallons per year. Emissions in this permit were

quantified at 51.7 tpy of PM/PM_{10}, 0.4 tpy of SO_2, 89.4 tpy of VOC, 15.1 tpy of CO, and 60.9 tpy of NO_x. Total HAP emissions were quantified at 14.81 tpy with the largest single HAP emissions attributed to benzene (3.19 tpy) and toluene (2.63 tpy).

Permit No. 698-AR-5 was issued to Firestone Building Products, Inc. on June 14, 2002. This modification to the minor source air permit for this facility was issued in order to allow for an increase in the production through the primer application machine (SN-315). This increase was accompanied by the installation of a thermal oxidizer to control VOC emissions from the primer application process. The addition of the thermal oxidizer allowed the facility to maintain its minor source status despite the production increase. The primer machine was permitted to emit any HAP with a TLV greater than or equal to 45 mg/m^3 with this modification.

Additionally, a new carbon black loading system was installed in order to allow for more efficient unloading of railcars entering the facility. There was no permitted emissions increase associated with the upgrade in the carbon black unloading system. The new system was expected to generate fewer emissions than the old system, but permitted limits remained unchanged. Total criteria emission limitations at this time were quantified at 51.7 tpy PM/PM_{10}, 0.4 tpy SO_2, 85.3 tpy VOC, 15.1 tpy CO, and 60.9 tpy NO_x. Total HAP emissions were quantified at 14.53 tpy, with the largest single HAP emissions attributed to benzene (3.27 tpy), xylene isomers (2.27 tpy), and toluene (2.94 tpy).

Permit No. 698-AR-6 was issued to Firestone Building Products, Inc. on August 21, 2003. This modification to the Minor Source Air Permit for the facility was issued in order to allow for the installation of a second primer machine, to be controlled by the existing thermal oxidizer at the plant (SN-315). In addition to the installation of the new primer machine, this modification allowed for an increase in the allowable VOC content of primer materials used in the two primer machines, as well as a slight increase in the maximum daily primer usage of primer at the machines. The new daily primer usage limitation was 28.0 gallons of primer per day. The new maximum VOC content for the primer materials was limited to 6.62 lb VOC per gallon of primer. Permitted emission limitations for the facility were quantified at 51.7 tpy of PM/PM10, 0.4 tpy SO2, 86.3 tpy VOC, 15.1 tpy CO, 60.9 tpy NOx, 3.27 tpy benzene, 2.27 tpy xylene, and 2.94 tpy toluene. Other HAPs and/or air contaminant limits were permitted at levels less than 1.0 tpy.

Permit No. 0698-AR-7 was issued to Firestone Building Products, Inc. on May 13, 2005. This modification to the Minor Source Air Permit for this facility was issued in order to allow for the following changes at the plant.

1. An increase in the allowable daily usage of solvent at the primer operation (SN-315) from 28 to 40 gallons per day,
2. An increase in the allowable VOC content of inks and cleaners used at the facility from 6.66 lb/gal to 7.0 lb/gal,
3. The addition of an insignificant emission source, the “Seam Tape Testing Lab Vent,”
4. The installation of a sixth autoclave (SN-08F),

5. An increase in the maximum allowable rubber processed through the K-1 and K-2 mixers from 316 million pounds per year to 432 million pounds per year, and
6. A change in the emission factors used to permit the rubber mixing operations. These operations had previously been permitted based on factors developed by the rubber manufacturer's association (RMA). The facility performed stack testing on the K-2 mixer in 1995 and has requested that those stack test results be the basis for permitted limits for PM/PM_{10} and VOC. The tested emission rates were multiplied by a 25% safety factor in order to set the permitted limits. These test factors are lower than the RMA factors, and result in lower emission estimates from the K1 and K2 mixers.
7. The removal of the K2 drop mill (SN-120) as a separate emission point. This source still exists within the plant, but emissions are now routed to the atmosphere through the K2 discharge stack (SN-104).

Permit No. 0698-AR-8 was issued to Firestone Building Products, Inc. on January 19, 2006. This modification to the Minor Source Air Permit for this facility was issued to delay compliance testing of the K-1 and K-2 Banbury Mixers' baghouses until, but no later than, June 15, 2006. By that date, the existing K-1 Mixer baghouses (SN-03, SN-04 and SN-20) will be removed and replaced with a single new baghouse (SN-03). All K-1 Mixer emissions will be routed through the new baghouse; therefore, SN 04 and SN-20 will be voided. The existing K-2 Mixer baghouses (SN-103 and SN-104) will also be removed and replaced with new baghouses. Additionally, Firestone received a Consent Administrative Order to use a raw rubber product, recently modified by a third party. The modified raw rubber product will be studied and testing completed during this delayed time period. Emissions associated with the existing baghouses are: 5.5 tpy of PM, 5.5 tpy PM_{10}, and 19.7 tpy VOC. There will be no change in permitted emissions from the facility as a result of the replacement of these baghouses. All production rates associated with the mixers will remain as currently permitted.

Permit No. 0698-AR-9 was issued to Firestone Building Products, Inc. on December 11, 2006. This permitting action increased the permitted VOC, Hexane, and total HAP emissions in response to the Consent Administrative Order issued on October 28, 2005. The increases resulted from the use of an Exxon EPDM polymer. The Exxon EPDM polymers produced greater VOC emissions due to a change in the production process of these polymers, which is supplied by a third party. The increases included an additional 4.0 tpy of VOC and 7.76 tpy of Hexane, with total HAP emissions increasing from 17.03 tpy to 24.79 tpy. Additionally, Firestone Building Products increased the daily solvent usage at the primer machines (SN-315), from 40 gallons per day to 60 gallons per day, without increasing the solvent's annual usage.

Permit No. 0698-AR-10 was issued on August 3, 2010. This permitting action allowed the facility to use solvents containing no HAPs at SN-315, and authorized a new procedure, Quick Prime Plus (SN-316), which entailed rolling out EPDM membrane and subsequently manually rolling with a primer. The total permitted emissions increases included 6.8 tpy of VOC, 0.1 tpy of PM10, and 1.41 tpy of Toluene. The Primer Machine HAP emissions were removed with this permitting action. Additionally, Firestone added 4 cooling towers to the Insignificant Activities list.

Permit 0698-AR-11 was issued on June 2, 2011. This permitting action allowed the addition of a devulcanization process to the Insignificant Activities list. There were no permitted emission changes with this Administrative Amendment.

Permit 0698-AR-12 was issued on December 16, 2011. This permitting action allowed for the following:

1. The replacement of the two 12" troesters (SN-13) on the Comerio Calender Line with two 13" troesters;
2. An increase of the process rate of the Comerio Calender Line on-line calender (SN-14) from 24,000 lb/hr to 26,000 lb/hr;
3. The installation of an automated process for the Quick Prime Plus pre-tape operation;
4. The removal of HAPs currently listed at SN-13 and SN-14;
5. The removal of the thermal oxidizer as a control device for the Primer/Laminating Machine (SN-315); and
6. Updates to the process description.

The total permitted emission increases included 2.92 tpy of Toluene. The total permitted emission decreases included 1.2 tpy of PM/PM_{10} and 2.0 tpy of VOC.

Permit 0698-AR-13 was issued on June 6, 2012. This permitting action allowed for the following:

1. Modified SN-202, the dust collector for the White Line Pigment Blender No. 11, installed a new fan (32,000 cfm) and re-routed SN-203 (White Line Banbury Mixer No. 11 inlet) and SN-204 (White Line Banbury Mixer No. 11 outlet) to this dust collector and removed the dust collectors at SN-203 and SN-204;
2. Installed a new autoclave (SN-08G);
3. Installed a shredder at the Comerio Calender line to process quality rejects from the calender to be blended back in with the extruder;
4. Installed a Mandrel Grinding Dust Collector system (SN-502);
5. Corrected information about the new Troesters (SN-13) on the Comerio Calender line that was approved with the De Minimis change approved on September 28, 2011. The new Troesters have a maximum capacity of 17,000 lb/hr per Troester, with a total maximum capacity of 34,000 lb/hr;
6. Increased the amount of rubber that can be mixed at the K1 and K2 Banbury Mixers from 432 MM lb/yr of rubber to 613 MM lb/yr of rubber;
7. Increased production through the Calender lines and the Autoclaves;
8. Removed source SN-15, which was the slab dip mix tank. Firestone no longer mixes slab dip at the facility;
9. Changed SN-160 from a fuel oil storage tank to a pigment oil storage tank;
10. Renamed SN-316 from "Quick Prime Plus" to "Pre-Tape Line";
11. Removed fuel oil as a fuel source for the boilers (SN-16A and SN-16B) and maximized emissions based on burning natural gas at each boiler for 8,760 hr/yr;
12. Revised the emission limits for various sources;

13. Removed the Breakdown Mill (SN-11), Strainer Mills No. 1 and No. 2 (SN-10 and SN-12), and the Heater (SN-403) from the permit; and
14. Removed various conditions that no longer apply to the facility with regards to compliance mechanisms, testing, etc.

The total permitted emission increases included 40.1 tpy of CO, 4.9 tpy of NO_x, 0.03 tpy of Allyl Chloride, 0.77 tpy of Hexane, 1.33 tpy of Methanol, 4.40 tpy of Methylene Chloride, 0.02 tpy of Beryllium, and 0.02 tpy of Chromium. The total permitted emission decreases included 1.0 tpy of PM/PM_{10}, 42.9 tpy of VOC, 0.05 tpy of 1,3-Butadiene, 3.27 tpy of Benzene, 0.29 tpy of Cumene, 0.24 tpy of POC, 0.30 tpy of Epichlorohydrin, 0.46 tpy of Ethylbenzene, 2.30 tpy of m- and p-Xylene, 0.63 tpy of o-Xylene, 0.53 toy of Dichloromethane, 0.04 tpy of Nickel Compounds, 0.04 tpy of Phenol, and 2.50 tpy of Toluene.

Permit 0698-AR-14 was issued on September 10, 2012. This permitting action allowed for the installation of a new white seam tape line (SN-317). The total permitted emission increases included 1.6 tpy of PM/PM_{10}, 0.2 tpy of VOC, 0.08 tpy of Hexane, 0.01 tpy of Methylene Chloride, and 0.04 tpy of Toluene.

Permit 0698-AR-15 was issued on February 22, 2013. This permitting action allowed Firestone Building Products to include two (2) emergency engines (SN-503 & SN-504) subject to 40 CFR Part 63, Subpart ZZZZ. The facility also modified the White Tape Line (SN-317 & SN-318) to route the vent from one of the raw materials to the exterior of the building due to the explosivity rating of the particulate. The total permitted emission increases included 0.2 tpy of PM/PM_{10}, 0.2 tpy of SO_2, 0.2 tpy of VOC, 0.2 tpy of CO, 0.8 tpy of NO_x, and 0.02 tpy of Toluene.

Permit 0698-AR-16 was issued on July 22, 2013. This permitting action allowed Firestone Building Products to use the primer and laminating machines (SN-315) to prime and roll thermoplastics olefin membrane and flashing to receive 'tape' products and install two (2) diesel operated air compressors (SN-505 and SN-506) to be used as emergency backup in the event of a power failure. The emergency engines are subject to 40 CFR Part 60, Subpart IIII. The total permitted emission increases included 0.2 tpy of PM/PM_{10}, 0.2 tpy of SO_2, 27.7 tpy of VOC, 0.6 tpy of CO, 2.6 tpy of NO_x, and 0.02 tpy of Toluene.

Permit 0698-AR-17 was issued on October 1, 2013. This permitting action allowed Firestone Building Products to permit a Laboratory Oven Vent as an A-5 Insignificant Activity. There were no permitted emission changes with this administrative amendment.

Permit 0698-AR-18 was issued on March 10, 2014. This permitting action allowed Firestone Building Products to revise the emissions from the devulcanization process. Testing was conducted in July of 2013 to better characterize emissions from this new technology. The results from the testing showed higher emission rates than were initially estimated. This source no longer qualified as an insignificant activity and was permitted as a source (SN-700). The permitted emission increases included 0.1 tpy of PM/PM_{10} and 11.7 tpy of VOC.

Permit 0698-AR-19 was issued on January 30, 2015. This permitting action allowed Firestone Building Products to:

1. Use any primer that meets the worst case emission limitation of 16.8 lb/hr either through stack testing or assuming 100% of the VOC content of the primer emitted;
2. Revise the emissions from the devulcanization process (SN-700) in order to increase hourly throughput; and
3. Operate the mandrel grinding operation without a dust collector (SN-502).

The permitted emission increases included 3.8 tpy of PM/PM_{10}.

Permit 0698-AR-20 was issued on April 24, 2015. This permitting action corrected a typographical error in the annual emissions for Methylene Chloride at SN-317. The permitted emission increases included 0.03 tpy of Methylene Chloride.

Permit 0698-AR-21 was issued on August 20, 2015. This permitting action added a new carbon black transfer system via truck unloading (SN-304A) and increased the Devulcanization extruder exhaust blower from 3,000 cubic feet per minute (cfm) to 6,000 cfm. There were no permitted annual emission increases with this permitting action.

Permit 0698-AR-22 was issued on October 3, 2016. This permitting action allowed Firestone Building Products to use an additional polymer feedstocks at the banbury mixers (SN-03, SN-103, and SN-104), and to update the emissions at the autoclaves (SN-08A – SN-08G) to account for the changes in polymer feedstock and cycle time. The permitted emission increases included 22.8 tpy of VOC.

Permit 0698-AR-23 was issued on April 17, 2017. This permitting action added a 10,000 gallon devulcanization paraffinic oil storage tank to the insignificant activities list. There were no permitted emission changes with this permitting action.

Permit 0698-AR-24 was issued July 19, 2018. This permit action created a plantwide VOC, and HAP limits; removed throughput and content limits; streamlined HAP permitting based on the most recent non-criteria pollutant control strategy; and increased operational; flexibility by streamlining permit conditions for compliance. Permitted emission increases included 0.3 tpy of SO_2, 1.0 tpy of CO, and 4.4 tpy of NO_x. Permitted emission decreases included 15.3 tpy of PM/PM_{10}, 0.01 tpy of Allyl Chloride, 5.9 tpy of Hexane, 0.82 tpy of Methanol, 2.69 tpy of Methylene Chloride, 4.74 tpy of Toluene, 0.02 tpy of Beryllium, 0.02 tpy of Chromium, and 5.56 tpy of Total HAP.

Permit 0698-AR-25 was issued December 11, 2018. This modification replaces SN-16A, Boiler #1, with SN-16T, Temporary Package Boiler (99.9 MMBtu/hr). This modification increased permitted emissions by 0.76 tpy of PM/PM_{10}, 0.06 tpy of SO_2, 8.47 tpy of CO, and decreased permitted emissions by 11.5 tpy of NO_x.

Permit 0698-AR-26 was issued on July 21, 2020. This modification permitted operation of a new natural gas fired boiler (Boiler #4), and renamed temporary package boiler (SN-16T) to Boiler #3; with this application Firestone has stated they have purchased the temporary boiler. This modification decreased permitted emissions by 0.6 tpy of PM_{10}, 0.1 tpy of SO_2, 7.2 tpy of CO, 4.3 tpy of NO_x, and increased permitted emissions of PM by 0.2 tpy.

Permit 0698-AR-27 was issued on March 11, 2022. This administrative amendment added a Diesel Storage Tank as an A-3 Insignificant Activity. Permitted emissions were unchanged.

Permit 0698-AR-28 was July 21, 2022. This De Minimis modification removes the Temporary Package Boiler #1 (SN-16T) and Boiler #4 (SN-16C), adds Boiler #5 (SN-16D) and Boiler #6 (SN-16E), removes Autoclave #1 (SN-08A), adds Autoclave #8 (SN-08H), revises any relevant special conditions, updates process descriptions, and clarifies the autoclave emission verification method and schedule. Permitted emissions are decreased by 2.3 tpy PM_{10}, 0.1 tpy SO_2, 26.5 tpy CO, 15.9 tpy NO_X, 2.3 tpy PM and 0.6 tpy Total HAPs

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. [Rule 19.501 *et seq.* and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
STORAGE and TRANSFER				
SN-01A	Carbon Black Storage Tank No. 1	PM_{10}	0.6	0.9
SN-01B	Carbon Black Storage Tank No. 2	PM_{10}	0.6	
SN-101A	Carbon Black Storage Tank No. 3	PM_{10}	0.6	
SN-101B	Carbon Black Storage Tank No. 4	PM_{10}	0.6	
SN-201	Carbon Black Storage Tank No. 5	PM_{10}	0.6	
SN-17A	Carbon Black Transfer	PM_{10}	0.1	0.4
SN-17B	Carbon Black Transfer	PM_{10}	0.1	
SN-301A	Carbon Black Rail Unloading #1	PM_{10}	0.3	0.4
SN-304	Carbon Black Rail Unloading #2	PM_{10}	0.2	
SN-304A	Carbon Black Truck Unloading #1	PM_{10}	0.3	
SN-18A	Carbon Black Surge Hopper K1 Banbury	PM_{10}	0.6	0.9
SN-18B	Carbon Black Surge Hopper K1 Banbury	PM_{10}	0.6	
SN-118	Carbon Black Surge Hopper K2	PM_{10}	0.6	1.9
SN-305	Carbon Black Surge Bin	PM_{10}	0.6	
SN-307	Kaolin Clay Silo A	PM_{10}	1.5	4.4
SN-308	Kaolin Clay Silo B	PM_{10}	1.5	
SN-309A	Kaolin Clay Surge Bin	PM_{10}	1.5	4.4
SN-309B	Kaolin Clay Surge Bin	PM_{10}	1.5	

SN	Description	Pollutant	lb/hr	tpy
SN-310	Kaolin Clay Railcar Circulation	PM_{10}	0.5	2.0
SN-311	Kaolin Clay Railcar Unloading	PM_{10}	0.5	
BLACK LINE				
SN-02A	Pigment Blender K #1	PM_{10}	0.1	0.8
SN-02B	Pigment Blender K #2	PM_{10}	0.1	
SN-102	Pigment Blender K2	PM_{10}	0.1	
SN-120	Pigment Weigh Area	PM_{10}	0.1	0.3
SN-03	Banbury Mixer K1 Baghouse (Inlet, discharge & mill drop)	PM_{10} VOC	0.2 10.0	0.8 --
SN-103	Banbury Mixer K2 Baghouse (Inlet)	PM_{10} VOC	0.1 4.5	0.4 --
SN-104	Banbury Mixer K2 Baghouse (Discharge)	PM_{10} VOC	0.1 5.5	0.4 --
SN-13	Troesters (Comerio Line)	PM_{10} VOC	0.1 0.7	0.1 --
SN-14	On Line Calender (Two Stacks)	VOC	0.7	--
SN-306	Duster (Emission Point 1)	PM_{10}	0.3	1.0
SN-07	Duster (Emission Point 2)	PM_{10}	0.3	1.0
SN-04	Removed (Emissions routed through SN-03)			
SN-20	Removed (Emissions routed through SN-03)			
SN-19	Solvent Storage	Not Currently In Use		
SN-119	Solvent Storage	Not Currently In Use		
WHITE LINE				
SN-202	Pigment Blenders #11	PM_{10} VOC	0.3 0.3	0.3 --
SN-203	Banbury Mixer #11 (Inlet)	Emissions routed through SN-202		
SN-204	Banbury Mixer #11 (Discharge)			
SN-205	Drop Mill and Slab Mill #11	PM_{10}	0.1	0.4
SN-317	White Seam Tape	PM_{10} VOC	0.4 0.1	1.5 --

SN	Description	Pollutant	lb/hr	tpy
SN-318	White Seam Tape (Exterior Exhaust)	PM_{10}	0.1	0.1
Z-CALENDER LINE				
SN-08B	Autoclave #2	VOC	0.4	--
SN-08C	Autoclave #3	VOC	0.4	--
SN-08D	Autoclave #4	VOC	0.4	--
SN-08E	Autoclave #5	VOC	0.4	--
SN-08F	Autoclave #6	VOC	0.4	--
SN-08G	Autoclave #7	VOC	0.8	--
SN-08H	Autoclave #8	VOC	0.4	--
SN-323A	Troester #1	PM_{10} VOC	0.1 0.3	0.1 --
SN-323B	Troester #2	PM_{10} VOC	0.1 0.3	0.1 --
SN-114	Calender	VOC	0.5	--
SN-116	Calender Vacuum	PM_{10}	0.3	1.0
SN-107	Duster #2	PM_{10}	0.3	1.0
SN-302	Wind Up Unit #2	PM_{10}	0.3	1.0
SN-303	Wrapping Unit #2	PM_{10}	0.3	1.0
FLASHING LINE				
SN-206	Breakdown Mill	PM_{10} VOC	0.1 0.2	0.1 --
SN-207	Feed Mill	PM_{10} VOC	0.1 0.2	0.1 --
SN-330	Calender	VOC	0.2	--
TAPE LINE				
SN-312	Mixer #2 - #3 Extruders	PM_{10} VOC	0.1 0.1	0.2 --
SN-313	Tape System Warm Up Mill	VOC	0.1	--
MISCELLANEOUS SOURCES				

SN	Description	Pollutant	lb/hr	tpy
SN-16D	Boiler #5 (Natural Gas, 53 MMBtu/hr)	PM_{10} SO_2 VOC CO NO_x	0.4 0.1 0.3 4.4 2.6	1.8 0.2 -- 19.2 11.4
SN-16E	Boiler #6 (Natural Gas, 53 MMBtu/hr)	PM_{10} SO_2 VOC CO NO_x	0.4 0.1 0.3 4.4 2.6	1.8 0.2 -- 19.2 11.4
SN-315	Primer/Laminating Machines (2 machines)	VOC	6.3	--
SN-316	Pre-Tape Operations (Automated and Manual)	VOC	2.1	--
SN-500	Maintenance/Cleaning	VOC	1.0	--
SN-501	Ink Marking Line	VOC	0.4	--
SN-502	Mandrel Grinding Operations	PM_{10}	2.4	3.4
SN-503	Emergency Diesel Fire Pump (277 BHp engine with Serial No. 16164979)	PM_{10} SO_2 VOC CO NO_x	0.7 0.6 0.7 1.9 8.6	0.2 0.2 -- 0.5 2.2
SN-504	Emergency Diesel Generator (150 Hp engine with Serial No. W040A15447)	PM_{10} SO_2 VOC CO NO_x	0.4 0.4 0.4 1.0 4.7	0.1 0.1 -- 0.3 1.2
SN-505	Emergency Diesel Air Compressor	PM_{10} SO_2 VOC CO NO_x	0.7 0.6 0.7 1.9 8.6	0.2 0.2 -- 0.5 2.2
SN-506	Emergency Diesel Air Compressor	PM_{10} SO_2 VOC CO NO_x	0.7 0.6 0.7 1.9 8.6	0.2 0.2 -- 0.5 2.2
SN-700	Devulcanization Process	PM_{10} VOC	0.2 4.5	0.6 --
--	Plantwide annual VOC emissions bubble	VOC	--	95.0

2. The permittee shall not exceed the emission rates set forth in the following table. [Rule 18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
STORAGE and TRANSFER				
SN-01A	Carbon Black Storage Tank No. 1	PM	0.6	0.9
SN-01B	Carbon Black Storage Tank No. 2	PM	0.6	
SN-101A	Carbon Black Storage Tank No. 3	PM	0.6	
SN-101B	Carbon Black Storage Tank No. 4	PM	0.6	
SN-201	Carbon Black Storage Tank No. 5	PM	0.6	
SN-17A	Carbon Black Transfer	PM	0.1	0.4
SN-17B	Carbon Black Transfer	PM	0.1	
SN-301A	Carbon Black Rail Unloading #1	PM	0.3	0.4
SN-304	Carbon Black Rail Unloading #2	PM	0.2	
SN-304A	Carbon Black Truck Unloading #1	PM	0.3	
SN-18A	Carbon Black Surge Hopper K	PM	0.6	0.9
SN-18B	Carbon Black Surge Hopper K	PM	0.6	
SN-118	Carbon Black Surge Hopper K2	PM	0.6	1.9
SN-305	Carbon Black Surge Bin	PM	0.6	
SN-307	Kaolin Clay Silo A	PM	1.5	4.4
SN-308	Kaolin Clay Silo B	PM	1.5	
SN-309A	Kaolin Clay Surge Bin	PM	1.5	4.4
SN-309B	Kaolin Clay Surge Bin	PM	1.5	
SN-310	Kaolin Clay Railcar Circulation	PM	0.5	2.0
SN-311	Kaolin Clay Railcar Unloading	PM	0.5	
BLACK LINE				

SN	Description	Pollutant	lb/hr	tpy
SN-02A	Pigment Blender K #1	PM	0.1	0.8
SN-02B	Pigment Blender K #2	PM	0.1	
SN-102	Pigment Blender K2	PM	0.1	
SN-120	Pigment Weigh Area	PM	0.1	0.3
SN-03	Banbury Mixer K1 Baghouse (Inlet, Discharge & Drop Mill)	PM Single HAP Total HAPs	0.2 N/A 0.63	0.8 -- --
SN-103	Banbury Mixer K2 Baghouse (Inlet)	PM Single HAP Total HAPs	0.1 N/A 0.29	0.4 -- --
SN-104	Banbury Mixer K2 Baghouse (Discharge)	PM Single HAP Total HAPs	0.1 N/A 0.35	0.4 -- --
SN-13	Troesters	PM Single HAP Total HAPs	0.1 N/A 0.45	0.1 -- --
SN-14	On Line Calender	Single HAP Total HAPs	N/A 0.45	-- --
SN-306	Duster (Emission Point 1)	PM	0.3	1.0
SN-07	Duster (Emission Point 2)	PM	0.3	1.0
SN-04	Removed (Emissions routed through SN-03)			
SN-20	Removed (Emissions routed through SN-03)			
SN-19	Solvent Storage	Not Currently In Use		
SN-119	Solvent Storage	Not Currently In Use		
WHITE LINE				
SN-202	Pigment Blenders #11	PM Single HAP Total HAPs	0.3 N/A 0.17	0.3 -- --
SN-203	Banbury Mixer #11 (Inlet)	Emissions routed through SN-202		
SN-204	Banbury Mixer #11 (Discharge)			
SN-205	Drop Mill and Slab Mill #11	PM	0.1	0.4
SN-317	White Seam Tape	PM Single HAP Total HAPs	0.4 N/A 0.03	1.5 -- --

SN	Description	Pollutant	lb/hr	tpy
SN-318	White Seam Tape (Exterior Exhaust)	PM	0.1	0.1
Z-CALENDER LINE				
SN-08B	Autoclave #2	Single HAP Total HAPs	N/A 2.00E-03	-- --
SN-08C	Autoclave #3	Single HAP Total HAPs	N/A 2.00E-03	-- --
SN-08D	Autoclave #4	Single HAP Total HAPs	N/A 2.00E-03	-- --
SN-08E	Autoclave #5	Single HAP Total HAPs	N/A 2.00E-03	-- --
SN-08F	Autoclave #6	Single HAP Total HAPs	N/A 2.00E-03	-- --
SN-08G	Autoclave #7	Single HAP Total HAPs	N/A 5.00E-03	-- --
SN-08H	Autoclave #8	Single HAP Total HAPs	N/A 2.00E-03	-- --
SN-323A	Troester #1	PM Single HAP Total HAPs	0.1 N/A 0.18	0.1 -- --
SN-323B	Troester #2	PM Single HAP Total HAPs	0.1 N/A 0.18	0.1 -- --
SN-114	Calender	Single HAP Total HAPs	N/A 0.35	-- --
SN-116	Calender Vacuum	PM	0.3	1.0
SN-107	Duster #2	PM	0.3	1.0
SN-302	Wind Up Unit #2	PM	0.3	1.0
SN-303	Wrapping Unit #2	PM	0.3	1.0
FLASHING LINE				
SN-206	Breakdown Mill	PM Single HAP Total HAPs	0.1 N/A 0.14	0.1 -- --
SN-207	Feed Mill	PM Single HAP Total HAPs	0.1 N/A 0.14	0.1 -- --
SN-330	Calender	Single HAP Total HAPs	N/A 0.14	-- --
TAPE LINE				

SN	Description	Pollutant	lb/hr	tpy
SN-312	Mixer #2 - #3 Extruders	PM Single HAP Total HAPs	0.1 N/A 0.05	0.2 -- --
SN-313	Tape System Warm Up Mill	Single HAP Total HAPs	N/A 0.01	-- --
MISCELLANEOUS SOURCES				
SN-16D	Boiler #5 (Natural Gas)	PM Single HAP (Hexane) Total HAPs	0.4 0.1 0.1	1.8 -- 0.4
SN-16E	Boiler #6 (Natural Gas)	PM Single HAP (Hexane) Total HAPs	0.4 0.1 0.1	1.8 -- 0.4
SN-316	Pre-Tape Operations (Automated and Manual)	Single HAP Total HAPs	N/A 1.96	-- --
SN-502	Mandrel Grinding Operations	PM	2.4	3.4
SN-503	Emergency Diesel Fire Pump (277 BHp engine with Serial No. 16164979)	PM Single HAP Total HAPs	0.7 N/A 8.01E-03	0.2 -- --
SN-504	Emergency Diesel Generator (150 Hp engine with Serial No. W040A15447)	PM Single HAP Total HAPs	0.4 N/A 4.34E-03	0.1 -- --
SN-505	Emergency Diesel Air Compressor	PM Single HAP Total HAPs	0.7 N/A 7.95E-03	0.2 -- --
SN-506	Emergency Diesel Air Compressor	PM Single HAP Total HAPs	0.7 N/A 7.95E-03	0.2 -- --
SN-700	Devulcanization Process	PM	0.2	0.6
--	Plantwide annual HAP emissions bubble	Single HAP Total HAPs	-- --	9.50 24.50

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

SN	Limit	Regulatory Citation
01A, 01B, 02A, 02B, 03, 07, 16D, 16E, 17A, 17B, 18A, 18B, 101A, 101B, 102 -104, 107, 116, 118,	5%	Reg.18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311

SN	Limit	Regulatory Citation
120, 201, 202, 205, 301A, 302, 303, 304, 304A, 305 - 308, 309A, 309B, 310 - 312, 317, 318, 502		
13, 206, 207, 323A, 323B, 503 - 506, 700	20%	Reg.19.503 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Rule 18, if the emission of the air contaminant constitutes air pollution within the meaning of Ark. Code Ann. § 8-4-303. [Rule 18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Rule 18.901 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-01 Conditions

6. The permittee shall update all MSDS for all raw materials used in rubber products production at the facility on an annual basis. These records shall be maintained on site, and shall be made available to Department personnel upon request. [Reg.18.1004, Reg.19.705, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

7. The permittee shall use only natural gas to fuel Boiler #5 (SN-16D) and Boiler #6 (SN-16E). [Reg.18.1004, Reg.19.705, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

8. The permittee shall submit a notification of the date of construction or reconstruction and actual startup (SN-16D and SN-16E), as provided by § 60.7 of this part. This notification shall include the design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility. [Reg.19.304 and 40 C.F.R. § 60.48(c)]

9. The permittee shall maintain monthly records of the amount of fuel combusted in Boiler #5 and Boiler #6 (SN-16D and SN-16E). [Reg.19.304 and 40 C.F.R. § 60.48(g)(2)]

10. The permittee shall not use any polymer in the K1 and K2 Mixers (SN-03, SN-103, and SN-104) which emit in excess of 4.20E-04 pounds of VOC per pound rubber, and 5.62E-05 pounds of VOC per pound rubber for autoclaves (SN-08B through SN-08H). [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

11. The permittee shall maintain records which demonstrate compliance with Specific Condition 10. These records shall indicate each polymer used and the polymer VOC emission factor (lb/lb rubber). The VOC emission factor shall be verified by Specific Condition 25. These records shall be kept on site, and shall be made available to Department personnel upon request. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

12. The permittee shall not process more than 99,338,400 pounds of Carbon Black through the unloading process (SN-301A, SN-304, and SN-304A) during any consecutive 12-month period. [Reg.19.705, Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

13. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition 12. These records shall indicate each month's throughput of carbon black each month, and the 12-month rolling total. Records shall be updated by the 15th day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Plant wide VOC Emissions Conditions

14. The permittee shall not discharge or cause the discharge into the atmosphere from the facility any gases which contain VOC from emission sources in the amount equal to or in excess of 95.0 tons during any rolling 12-month period. Compliance with this condition shall be determined by compliance with Specific Condition 15. [Reg.19.501 *et seq.* and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

15. The permittee shall calculate the monthly VOC emissions from all VOC emitting sources by the following methods. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

    a. For the K1 and K2 mixers (SN-03, SN-103, and SN-104), the VOC emissions will be based on the polymers used according to the following formula:

$$\text{VOC emissions} = \sum_{i=1}^{n} P_i \times M_i$$

Where:
P = Monthly polymer throughput for polymer i
M = Mixing emission factor for polymer i
n = The number of different polymers

b. For the autoclaves (SN-08A through SN-08G), the VOC emissions will be based on the polymers used according to the following formula:

$$\text{VOC emissions} = \sum_{i=1}^{n} P_i \times C_i$$

Where:
P = Monthly polymer throughput for polymer i
M = Curing emission factor for polymer i
n = The number of different polymers

c. For the Troesters (SN-13), On Line Calender (SN-14), Pigment Blenders #11 (SN-202), White Seam Tape (SN-317), Troester #1 (SN-323A), Troester #2 (SN-323B), Calender (SN-114), Breakdown Mill (SN-206), Feed Mill (SN-207), Calender (SN-330), Mixer-Extruders (SN-312), Tape System Warm Up (SN-313), and Devulcanization (SN-700), the VOC emissions will be based on the monthly throughput times the established emission factor for those operations.

VOC emissions = Monthly throughput * established emission factor

d. For Primer Laminating (SN-315), Pre-Tape Operations (SN-316), Maintenance Cleaning (SN-500) and Ink Marking (SN-501), the VOC emissions will be calculated as follows:

VOC emissions = Monthly throughput (gallons) * VOC content (lb/gallon)

e. For the Boilers #5 and #6 (SN-16D and SN-16E) and emergency engines (SN-503, SN-504, SN-505 and SN-506), the VOC emissions will be based on fuel usage and the corresponding AP-42 emission factor.

16. The permittee shall maintain records which demonstrate compliance with Specific Conditions 14 and 15. These records shall include all the necessary information to determine the monthly VOC emissions and the rolling 12-month total of VOC emissions. Records shall be updated by the 15th day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-500 and SN-501 Conditions

17. The permittee shall not use any solvent at the facility for cold cleaning parts (SN-500) which contains VOC in excess of 8.9 pounds per gallon. The solvents used shall not contain HAPs. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

18. The permittee shall not use any inks or cleaners (SN-501) at the facility which contain VOC in excess of 8.0 pounds per gallon. The inks or cleaners used shall not contain HAPs. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

19. The permittee shall maintain monthly records which demonstrate compliance with Specific Conditions 17 and 18. These records shall indicate each month's usage of inks, cleaners, or solvents, and shall indicate the VOC content (in lb/gal) for each ink, cleaner, or solvent used during each month. Records shall be updated by the 15th day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-315 Conditions

20. The permittee shall not use any primer in either of the two primer machines (SN-315) which has VOC content in excess of 2.1 pounds per gallon or emits more than 6.3 lb/hr of VOC. The primer shall not contain HAPs. [Reg.18.1004, Reg.19.705, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

21. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition 20. These records shall indicate the VOC content (in lb/gal) for each material used during each month. Records shall be updated by the 15th day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-316 Conditions

22. The permittee shall not use any primer in Pre-Tape Operations (Automated and Manual) (SN-316) which contains in excess of 1.96 pounds per gallon of VOC. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

23. The permittee shall not use any primer in the Pre-Tape Operations (SN-316) which contains in excess of 1.87 pounds per gallon of Toluene. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

24. The permittee shall maintain records which demonstrate compliance with Specific Conditions 22 and 23. These records shall indicate the VOC content (lb/gal) and the Toluene content (lb/gal). These records shall be kept on site, and shall be made available to Department personnel upon request. [Reg.18.1004, Reg.19.705, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Testing Requirements

25. The permittee shall perform stack testing of the seven autoclaves to verify emission factors. Testing shall be performed once every sixty (60) months. Each test shall include three of the six autoclaves of the same capacity (SN-8B through SN-08F and SN-08H) and Autoclave #7 (SN-08G). Each autoclave tested shall be rotated so that no autoclave is tested twice before another autoclave of equal capacity is tested once.

Source	Last Reported Test Date
SN-08B (Autoclave #2)	8/10/2021
SN-08C (Autoclave #3)	10/15/2019
SN-08D (Autoclave #4)	8/13/2019
SN-08E (Autoclave #5)	8/10/2021
SN-08F (Autoclave #6)	8/13/2019
SN-08G (Autoclave #7)	8/10/2021
SN-08H (Autoclave #8)	New*

*See Specific Condition #26.

The permittee shall either stack test the autoclaves and the K1 mixers or perform bench scale testing. If stack testing is conducted, then EPA Reference Methods 25A, SW-846 Method 0031 (modified), and/or EPA TO-15 (modified) shall be used to determine the total VOC and HAP concentrations. If bench scale testing is performed, then the facility shall use equivalents methods used for stack testing when performing the bench scale testing. Testing shall be conducted with the source operating at least at 90% of its permitted capacity. Emission testing results shall be extrapolated to correlate with 100% of the permitted capacity to demonstrate compliance. Failure to test within this range shall limit the permittee to operating within 10% above the tested rate. The permittee shall measure the operation rate during the test and if testing is conducted below 90% of the permitted capacity, records shall be maintained at all times to demonstrate that the source does not exceed operation at 10% above the tested rate. [Reg.18.1001, Reg.19.702, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

26. Autoclave #8 (SN-08H) shall be tested within sixty (60) days after achieving its maximum permitted production rate, but no later than one hundred and eighty (180) days after its initial start-up, satisfying General Condition #7 and #25. [Reg.18.1001, Reg.19.702, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

27. The permittee shall continue testing SN-700 for VOC emissions once every 60 months.

Source	Last Reported Test Date
SN-700 (Devulcanization Process)	7/9/2019

The stack test shall be performed using EPA Reference Method 25A. If at any time the facility has test results indicating an exceedance of a permitted emission rate, then the facility shall retest for the failing pollutant within 60 days of the failing test, and every 12 months thereafter. When the facility demonstrates that the facility is in compliance with the permitted emission rates after two consecutive passing tests, then the facility may return to performing stack testing once every 60 months. This unit shall be operated at 90% or more of rated capacity when the tests are completed. Emission testing results shall be extrapolated to correlate with 100% of the permitted capacity to demonstrate compliance. Failure to test within this range shall limit the permittee to operating within 10% above the tested rate. The permittee shall measure the operation rate during the test and if testing is conducted below 90% of the permitted capacity, records shall be maintained at all times to demonstrate that the source does not exceed operation at 10% above the tested rate until a subsequent test can be successfully conducted at 90% or above. The maximum rated capacity of SN-700 is 3,000 pounds of EPDM per hour. The permittee shall conduct the required tests in accordance with General Condition 7. [Reg.19.702 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-503 and SN-504 Conditions

28. The permittee shall not operate the emergency diesel fire pump (SN-503) in excess of 500 hours per calendar year. If the permittee operates SN-503 in excess of 100 hours during any calendar year, the permittee shall provide the necessary documentation to demonstrate that the engine still qualifies as an emergency engine as outlined in § 63.6640(f). [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

29. The permittee shall not operate the emergency diesel generator (SN-504) in excess of 500 hours per calendar year. If the permittee operates SN-504 in excess of 100 hours during any calendar year, the permittee shall provide the necessary documentation to demonstrate that the engine still qualifies as an emergency engine as outlined in § 63.6640(f). [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

30. The permittee shall maintain records which demonstrate compliance with the limit set in Specific Conditions 28 and 29. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on

site and made available to Department personnel upon request. A calendar year total and each individual month's data shall be recorded. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

31. SN-503 and SN-504 are considered affected sources under 40 CFR 63, Subpart ZZZZ - *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, and is subject, but not limited to, Specific Conditions 32 through 46. [Reg.19.304 and 40 C.F.R. § 63, Subpart ZZZZ]

32. The permittee shall comply with the following requirements for existing stationary RICE located at an area source of HAP emissions: [Reg.19.304, §63.6603, and Table 2d of 40 C.F.R. § 63, Subpart ZZZZ]

For each	The permittee shall meet the following requirement, except during periods of startup	During periods of startup the permittee shall
SN-503[2] & SN-504[2]	a. Change oil and filter every 500 hours of operation or annually, whichever comes first;[1] b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

[1]Sources have the option to utilize an oil analysis program as described in § 63.6625(i) in order to extend the specified oil change requirement in Table 2d of 40 C.F.R. § 63, Subpart ZZZZ.
[2]If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of 40 C.F.R. § 63, Subpart ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

33. The permittee must operate and maintain SN-503 and SN-504 RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [Reg.19.304 and § 63.6625(e)]

34. The permittee shall install a non-resettable hour meters at SN-503 and SN-504. [Reg.19.304 and § 63.6625(f)]

35. The permittee shall minimize SN-503 and SN-504's time spent at idle during startup and minimize these engines' startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to 40 CFR Part 63, Subpart ZZZZ apply. [Reg.19.304 and § 63.6625(h)]

36. The permittee has the option of utilizing an oil analysis program at SN-503 and SN-504 in order to extend the specified oil change requirement in Table 2d to 40 CFR Part 63, Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to 40 CFR Part 63, Subpart ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has change by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [Reg.19.304 and § 63.6625(i)]

37. The permittee must be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times. [Reg.19.304 and § 63.6605(a)]

38. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [Reg.19.304 and § 63.6605(b)]

39. The permittee shall continuously comply with the emissions and operating limitations and work or management practices as required by the following: [Reg.19.304, § 63.6640(a), and Table 6 of 40 C.F.R. § 63, Subpart ZZZZ]

For each	Complying with the requirement to	The permittee shall demonstrate continuous compliance by
SN-503 & SN-504	Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

40. The permittee shall report each instance in which the permittee did not meet each applicable emission limitation or operating limitation in Table 2d to 40 CFR Part 63, Subpart ZZZZ. These instances are deviations from the emission and operating limitations in 40 CFR Part 63, Subpart ZZZZ. These deviations must be reported according to the requirements in § 63.6650. If the permittee changes the catalyst, the permittee shall reestablish the values of the operating parameters measured during the initial performance test. When the permittee reestablishes the values of the operating parameters, the permittee shall also conduct performance test(s) to demonstrate that the permittee is meeting the required emission limitation applicable to the engine(s). [Reg.19.304 and § 63.6640(b)]

41. The permittee shall also report each instance in which you did not meet the applicable requirements in Table 8 to 40 CFR Part 63, Subpart ZZZZ. [Reg.19.304 and § 63.6640(e)]

42. The permittee shall operate SN-503 and SN-504 according to the requirements in paragraphs (f) (1) (i) through (iii) of § 63.6640. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f) (1) (i) through (iii) of § 63.6640, is prohibited. If the permittee does not operate the engine according to the requirements in paragraphs (f) (1) (i) through (iii) of § 63.6640, the engine will not be considered an emergency engine under 40 CFR Part 63, Subpart ZZZZ and will need to meet all requirements for non-emergency engines. [Reg.19.304 and § 63.6640(f)(1)]
    a. There is no time limit on the use of emergency stationary RICE in emergency situations.
    b. The permittee may operate SN-503 and SN-504 for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance

company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.

c. The permittee may operate SN-503 and SN-504 up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.

43. The permittee shall keep the records described in paragraphs (a) (1) through (a) (5), and (b) (1) through (b) (3) of § 63.6655. [Reg.19.304 and § 63.6655(a) and (b)]
    a. A copy of each notification and report that you submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in § 63.10(b)(2)(xiv).
    b. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
    c. Records of performance tests and performance evaluations as required in § 63.10(b) (2) (viii).
    d. Records of all required maintenance performed on the air pollution control and monitoring equipment.
    e. Records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

44. The permittee shall keep the records required in Table 6 of 40 C.F.R. § 63, Subpart ZZZZ to show continuous compliance with each applicable emission or operating limitation. [Reg.19.304 and § 63.6655(d)]

45. The permittee shall keep records of the maintenance conducted on SN-503 and SN-504 in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan. [Reg.19.304 and § 63.6655(e)]

46. The permittee shall keep records of the hours of operation of SN-503 and SN-504 that are recorded through the non-resettable hour meters. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in § 63.6640(f)(2)(ii) or (iii) or § 63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [Reg.19.304 and § 63.6655(f)]

SN-505 and SN-506 Conditions

47. The permittee shall not operate the emergency diesel air compressor (SN-505) in excess of 500 hours per calendar year. If the permittee operates SN-505 in excess of 100 hours during any calendar year, the permittee shall provide the necessary documentation to demonstrate that the engine still qualifies as an emergency engine as outlined in §60.4211(f). [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

48. The permittee shall not operate the emergency diesel air compressor (SN-506) in excess of 500 hours per calendar year. If the permittee operates SN-506 in excess of 100 hours during any calendar year, the permittee shall provide the necessary documentation to demonstrate that the engine still qualifies as an emergency engine as outlined in §60.4211(f). [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

49. The permittee shall maintain records which demonstrate compliance with the limit set in Specific Conditions 47 and 48. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site and made available to Department personnel upon request. A calendar year total and each individual month's data shall be recorded. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

50. SN-505 and SN-506 are considered affected sources under 40 CFR Part 60, Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, and is subject, but not limited to, Specific Conditions 51 through 60. [Reg.19.304 and 40 C.F.R. § 60, Subpart IIII]

51. Owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in §60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE. [Reg.19.304 and 40 C.F.R. § 60.4205(b)]

52. For engines with a maximum engine power greater than or equal to 37 KW (50 HP), the certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR §89.112 and 40 CFR §89.113 for all pollutants beginning in model year 2007. SN-505 and SN-506 were Tier 3 certified engines upon installation. [Reg.19.304 and 40 C.F.R. § 60.4202(a)(2)]

53. Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in §§ 60.4204 and 60.4205 over the entire life of the engine. [Reg.19.304 and 40 C.F.R. § 60.4206]

54. Beginning October 1, 2010, owners and operators of stationary CI ICE subject to 40 CFR Part 60, Subpart IIII with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. [Reg.19.304 and 40 C.F.R. § 60.4207(b)]

55. If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine. [Reg.19.304 and 40 C.F.R. § 60.4209(a)]

56. If you are an owner or operator and must comply with the emission standards specified in 40 CFR Part 60, Subpart IIII, you must do all of the following, except as permitted under paragraph (g) of 40 CFR §60.4211:

    a. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;
    b. Change only those emission-related settings that are permitted by the manufacturer; and
    c. Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.

    [Reg.19.304 and 40 C.F.R. § 60.4211(a)]

57. If you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in § 60.4204(b) or § 60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to 40 CFR Part 60, Subpart IIII and must comply with the

emission standards specified in § 60.4205(c), you must comply by purchasing an engine certified to the emission standards in § 60.4204(b), or § 60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in paragraph (g) of 40 CFR § 60.4211. [Reg.19.304 and 40 C.F.R. § 60.4211(c)]

58. If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3) of 40 CFR § 60.4211. In order for the engine to be considered an emergency stationary ICE under 40 CFR Part 60, Subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (3) of 40 CFR § 60.4211, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (3) of 40 CFR § 60.4211, the engine will not be considered an emergency engine under 40 CFR Part 60, Subpart IIII and must meet all requirements for non-emergency engines.

a. There is no time limit on the use of emergency stationary ICE in emergency situations.
b. You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of 40 CFR §60.4211for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (f)(3) of 40 CFR § 60.4211 counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).
    i. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
    ii. Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

iii. Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

c. Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of 40 CFR § 60.4211. Except as provided in paragraph (f)(3)(i) of 40 CFR § 60.4211, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

1. The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
2. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
3. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
4. The power is provided only to the facility itself or to support the local transmission and distribution system.
5. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

[Reg.19.304 and 40 C.F.R. § 60.4211(f)]

59. If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

a. If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must

conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

[Reg.19.304 and 40 C.F.R. § 60.5211(g)]

60. If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 to 40 CFR Part 60, Subpart IIII, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time. [Reg.19.304 and 40 C.F.R. § 60.4214(b)]

Section V: INSIGNIFICANT ACTIVITIES

The Division of Environmental Quality deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Rule 18 and Rule 19 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated (*insert application date*). [Rule 19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
Devulcanization Paraffinic Oil Storage Tank (10,000 gallons)	A-3
Diesel Storage Tank (650 gallons)	A-3
Seam Tape Testing Lab Vent	A-5
Laboratory Oven Vent	A-5
Curing Cooling Tower	A-13
Chiller Cooling Tower	A-13
Process Cooling Tower	A-13
Mixtruder Cooling Tower	A-13
Day Tanks for SN-317 (1 x 80 gallon tank and 1 x 139.9 gallon tank)	A-13
Comerio Line Shredder	A-13
Bark Hog & Horizontal Hog	A-13
Slab Dip/Soap Tanks (previously permitted as SN-09, SN-109, and SN-115)	A-13
20,000-gallon Mineral Oil Storage Tank (previously permitted as SN-130)	B-21
Pigment Oil Storage Tanks (previously permitted as SN-131, SN-132, SN-133, & SN-160) 2 tanks have a capacity of 20,000 gallons and 2 tanks have a capacity of 50,000 gallons	B-21
2x 10,000-gallon Process Oil Storage Tanks (previously permitted as SN-314A and SN-314B)	B-21
Cooling Tower	A-13

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Rule 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Rule 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Rule 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.

2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the rules promulgated under the Act. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

3. The permittee shall notify the Division of Environmental Quality in writing within thirty (30) days after each of the following events: Commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Rule 19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Rule 19.410(B) and/or Rule 18.309(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

5. The permittee must keep records for five years to enable the Division of Environmental Quality to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Division of Environmental Quality may use the records, at the discretion of the Division of Environmental Quality, to determine compliance with the conditions of the permit. [Rule 19.705 and/or Rule 18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Division of Environmental Quality electronically using https://eportal.adeq.state.ar.us or mail them to the address below. [Rule 19.705 and/or Rule 18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

   Division of Environmental Quality
   Office of Air Quality

ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Division of Environmental Quality. The permittee must notify the Division of Environmental Quality of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Division of Environmental Quality within sixty (60) calendar days after the completion of testing. [Rule 19.702 and/or Rule 18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

8. The permittee shall provide: [Rule 19.702 and/or Rule 18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

   a. Sampling ports adequate for applicable test methods;
   b. Safe sampling platforms;
   c. Safe access to sampling platforms; and
   d. Utilities for sampling and testing equipment

9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Rule 19.303 and/or Rule 18.1104 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Division of Environmental Quality may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Rule 19.601 and/or Rule 18.1101 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

    a. The permittee demonstrates to the satisfaction of the Division of Environmental Quality that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
    b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, overnight delivery, or online at https://eportal.adeq.state.ar.us) to the Division of Environmental Quality by the

end of the next business day after the occurrence or the discovery of the occurrence.

c. The permittee must submit to the Division of Environmental Quality, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Division of Environmental Quality upon the presentation of credentials: [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
c. To inspect any monitoring equipment or monitoring method required in this permit;
d. To sample any emission of pollutants; and
e. To perform an operation and maintenance inspection of the permitted source.

12. The Division of Environmental Quality issued this permit in reliance upon the statements and presentations made in the permit application. The Division of Environmental Quality has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

13. The Division of Environmental Quality may revoke or modify this permit when, in the judgment of the Division of Environmental Quality, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the rules promulgated the Arkansas Water and Air Pollution Control Act. [Rule 19.410(A) and/or Rule 18.309(A) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Division of Environmental Quality and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Division of Environmental Quality denies the request to transfer within thirty (30) days of the receipt of the

disclosure statement. The Division of Environmental Quality may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Rule 19.407(B) and/or Rule 18.307(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

16. This permit authorizes only those pollutant emitting activities addressed herein. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

17. This permit supersedes and voids all previously issued air permits for this facility. [Rule 18 and/or Rule 19 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

18. The permittee must pay all permit fees in accordance with the procedures established in Rule 9. [Ark. Code Ann. § 8-1-105(c)]

19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Division of Environmental Quality approval. The Division of Environmental Quality may grant such a request, at its discretion in the following circumstances:

    a. Such an extension does not violate a federal requirement;
    b. The permittee demonstrates the need for the extension; and
    c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

    [Rule 18.314(A) and/or Rule 19.416(A), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Division of Environmental Quality approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:

    a. Such a request does not violate a federal requirement;
    b. Such a request is temporary in nature;
    c. Such a request will not result in a condition of air pollution;

d. The request contains such information necessary for the Division of Environmental Quality to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Rule 18.314(B) and/or Rule 19.416(B), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Division of Environmental Quality approval. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:
    a. The request does not violate a federal requirement;
    b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
    c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

    [Rule 18.314(C) and/or Rule 19.416(C), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

22. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [Rule 18.1001, Rule 19.701, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]