ADEQ
MINOR SOURCE
AIR PERMIT

Permit #: 0698-AR-8

IS ISSUED TO:

Firestone Building Products, Incorporated
1406 Highway 371 North
Prescott, Arkansas 71857
Nevada County
AFIN: 50-00006

THIS PERMIT IS Firestone Building Products, Incorporated's AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Porta
Interim Chief, Air Division

Date

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Section I: FACILITY INFORMATION

PERMITTEE:	Firestone Building Products, Incorporated
AFIN:	50-00006
PERMIT NUMBER:	0698-AR-8
FACILITY ADDRESS:	1406 Highway 371 North Prescott, AR 71857
COUNTY:	Nevada County
CONTACT PERSON:	James McKamie
CONTACT POSITION	Corporate Safety & Environmental Director
TELEPHONE NUMBER:	800-428-4511
REVIEWING ENGINEER:	Patty Campbell
UTM Zone	15
UTM North-South (Y):	3741.0 km N
UTM East-West (X):	461.4 km E

Section II: INTRODUCTION

Summary

Firestone Building Products Company owns and operates a rubber roofing manufacturing facility located in Prescott, Arkansas. With this permitting action Firestone has requested a modification 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.

Process Description

Firestone produces various rubber roofing products. Rubber roofing products are produced from a mixture of ethylene propylene diamine monomer (EPDM), carbon black or titanium dioxide, pigments, and additives. Raw materials are fed to a Banbury mixer. The molten rubber mixture from the Banbury mixer is milled into sheets for dewatering and temporary storage. Slabs from temporary storage are extruded and worked into sheets of various thicknesses. Sheets are dusted, wound up, and cured in an autoclave. Autoclaves are pressurized through a heat cycle, cure cycle, and a cool down cycle until a set temperature is reached. When the set temperature is reached, a vent is opened and remains open until the completion of the cool down cycle. The vent is typically open for less than one hour per cycle. Cycle times vary depending upon the type of product being cured.

In addition to the lines that produce rubber roofing products, Firestone also operates a tape line. In this line, a premixed compound of EPDM, polybutene, synthetic rubber, and additives is charged to a double blending arm mixer. EPDM, bromobutyl, and carbon black are added to increase the batch size. The mixture can be temporarily stored or immediately transferred to the mixtruder, which mixes and extrudes in one piece of equipment. Additional EPDM, lime, and polybutene are added in the mixtruder to further increase the batch size. The batch is then mixed and extruded into cooling trays. The cooled batch is charged into the double arm mixer where mineral oil, phenolic resin, and solid curing agents are added. The batch is mixed under a vacuum to produce a homogenous polymer mixture. A dusting agent is added and the batch is allowed to cool. The cooled batch is fed to a closed feeder system which is maintained under a vacuum. The feeder system moves the polymer material to an extruder, which converts the polymer to a thin sheet that can be deposited on a silicone treated release paper. The tape product is then conveyed to an electric oven for curing. After curing, the product is wound onto a roll and packaged for shipping.

The facility operates two primer and laminating machines for the purposes of applying an activator (primer) to the rubber "tape". This activator air dries and the rubber is then rolled up by the laminating machine. VOC emissions from both primer machines are controlled by a common thermal oxidizer (SN-315).

Regulations

The following table contains the regulations applicable to this permit.

Source No.	Regulations
Facility-wide	Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Facility-wide	Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004

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

Table 1 - Total Allowable Emissions

TOTAL ALLOWABLE EMISSIONS		
Pollutant	**Emission Rates**	
	lb/hr	**tpy**
PM	32.9	48.4
PM_{10}	32.9	48.4
SO_2	0.3	0.4
VOC	27.6	64.5
CO	5.5	15.1
NO_x	21.8	60.9
1,3-Butadiene	0.02	0.04
MEK	0.13	0.39
Benzene	1.12	3.27
Cumene	0.09	0.28
POC[1]	0.06	0.18
Epichlorohydrin	0.10	0.30
Ethylbenzene	0.16	0.45

Hexane	0.32	0.95
m- and p-Xylene	0.78	2.27
o-Xylene	0.22	0.62
Dichloromethane	0.17	0.53
Nickel Compounds	0.01	0.04
Phenol	0.01	0.04
Toluene	1.01	2.95
Primer Machine HAPs[2]	1.08	4.72

[1] Polycyclic Organic Compounds, primarily cyclooctadiene isomers
[2] the primer machines (SN-315) are permitted to emit any HAP with a TLV greater than or equal to 100 mg/m3. See Specific Condition #18.

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).

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee will not exceed the emission rates set forth in the following table. [§19.501 *et seq.* of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective December 19, 2004, (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 2 - Criteria Pollutants

SN	Description	Pollutant	lb/hr	Tpy
STORAGE and TRANSFER				
SN-1A	Carbon Black Storage Tank No. 1	PM_{10}	2.0	3.3
SN-1B	Carbon Black Storage Tank No. 2	PM_{10}	2.0	
SN-101A	Carbon Black Storage Tank No. 3	PM_{10}	1.5	3.3
SN-101B	Carbon Black Storage Tank No. 4	PM_{10}	1.5	
SN-201	Carbon Black Storage Tank No. 5	PM_{10}	1.5	
SN-17A	Carbon Black Transfer	PM_{10}	0.8	3.3
SN-17B	Carbon Black Transfer	PM_{10}	0.8	
SN-301A	Carbon Black Rail Unloading #1	PM_{10}	0.1	0.1
SN-304	Carbon Black Rail Unloading #2	PM_{10}	0.1	0.2
SN-18A	Carbon Black Surge Hopper K	PM_{10}	0.8	0.8
SN-18B	Carbon Black Surge Hopper K	PM_{10}	0.8	
SN-118	Carbon Black Surge Hopper K2	PM_{10}	0.8	0.8
SN-305	Carbon Black Surge Bin	PM_{10}	0.8	
SN-307	Kaolin Clay Silo A	PM_{10}	1.5	0.9
SN-308	Kaolin Clay Silo B	PM_{10}	1.5	
SN-309A	Kaolin Clay Surge Bin	PM_{10}	1.5	0.9
SN-309B	Kaolin Clay Surge Bin	PM_{10}	1.5	
SN-310	Kaolin Clay Railcar Circulation	PM_{10}	0.9	1.8
SN-311	Kaolin Clay Railcar Unloading	PM_{10}	0.9	
SN-130	Mineral Oil Storage Tank	VOC	0.1	0.1
SN-131	Pigment Oil 20M Storage Tank	VOC	0.1	0.1
SN-132	Pigment Oil 50M Storage Tank #1	VOC	0.1	0.1
SN-133	Pigment Oil 50M Storage Tank #2	VOC	0.1	0.1
SN-160	No. 2 Fuel Oil Storage Tank	VOC	0.1	0.1
BLACK LINE				
SN-02A	Pigment Blender K #1	PM_{10}	0.5	0.3
SN-02B	Pigment Blender K #2	PM_{10}	0.5	
SN-102	Pigment Blender K2	PM_{10}	0.1	
SN-103	Banbury Mixer K2 Baghouse (Inlet)	PM_{10} VOC	0.6 0.6	2.3 2.7
SN-104	Banbury Mixer K2 Baghouse (Discharge)	PM_{10}	0.1	0.5

SN	Description	Pollutant	lb/hr	Tpy
		VOC	1.1	4.8
SN-109	Slab Mill and Soap Dip Tank K2	PM_{10} VOC	0.1 3.1	0.1 3.4
SN-15	Slab Dip Mix Tank	PM_{10} VOC	0.8 1.0	4.0 4.4
SN-03	Banbury Mixer K1 Baghouse (Inlet, discharge & mill drop)	PM_{10} VOC	0.7 2.8	2.7 12.2
SN-04	Removed (Emissions routed through SN-03)			
SN-20	Removed (Emissions routed through SN-03)			
SN-09	Slab Mill and Soap Dip Tank	PM_{10} VOC	0.1 3.1	0.1 3.4
SN-11	Breakdown Mill	PM_{10} VOC	0.1 0.5	0.4 2.2
SN-10	Strainer Mill #1	PM_{10} VOC	0.1 0.5	0.4 2.2
SN-12	Strainer Mill #2	PM_{10} VOC	0.1 0.5	0.4 2.2
SN-13	Troesters	PM_{10} VOC	0.2 0.5	0.9 2.2
SN-14	On Line Calendar	PM_{10} VOC	0.1 0.5	0.4 2.2
SN-19	Solvent Storage	Not Currently In Use		
SN-119	Solvent Storage	Not Currently In Use		
SN-306	Duster (Emission Point 1)	PM_{10}	0.3	1.3
SN-7	Duster (Emission Point 2)	PM_{10}	0.3	1.5
WHITE LINE				
SN-202	Pigment Blenders #11	PM_{10}	2.0	1.2
SN-203	Banbury Mixer #11 (Inlet)	PM_{10}	0.8	3.1
SN-204	Banbury Mixer #11 (Discharge)	PM_{10} VOC	0.1 0.3	0.4 1.3
SN-205	Drop Mill and Slab Mill #11	PM_{10} VOC	0.1 0.8	0.4 0.9
SN-115	Slab Dip Mix Tank #11	PM_{10} VOC	0.1 0.8	0.4 0.9
Z-CALENDAR LINE				
SN-323A	Troester #1	PM_{10} VOC	0.1 0.1	0.4 0.4
SN-323B	Troester #2	PM_{10} VOC	0.1 0.1	0.4 0.4
SN-114	Calendar	PM_{10} VOC	0.1 0.3	0.4 1.3
SN-116	Calendar Vacuum	PM_{10} VOC	0.1 0.3	0.4 1.3

SN	Description	Pollutant	lb/hr	Tpy
SN-107	Duster #2	PM_{10}	0.3	1.3
SN-302	Wind Up Unit #2	PM_{10}	0.2	0.9
SN-303	Wrapping Unit #2	PM_{10}	0.1	0.2
SN-08A	Autoclave #1	VOC	0.5	4.8
SN-08B	Autoclave #2	VOC	0.5	
SN-08C	Autoclave #3	VOC	0.5	
SN-08D	Autoclave #4	VOC	0.5	
SN-08E	Autoclave #5	VOC	0.5	
SN-08F	Autoclave #6	VOC	0.5	
FLASHING LINE				
SN-206	Breakdown Mill	PM_{10} VOC	0.1 0.1	0.4 0.4
SN-207	Feed Mill	PM_{10} VOC	0.1 0.1	0.4 0.4
SN-330	Calendar	PM_{10} VOC	0.1 0.1	0.4 0.4
TAPE LINE				
SN-312	Mixer #2 - #3 Extruders	PM_{10} VOC	0.2 0.4	0.8 1.8
SN-313	Tape System Warm Up Mill	PM_{10} VOC	0.1 1.0	0.1 0.6
SN-314A	Process Oil Storage	VOC	0.1	0.1
SN-314B	Process Oil Storage	VOC	0.1	0.1
MISCELLANEOUS SOURCES				
SN-500	Maintenance/Cleaning	VOC	1.0	0.6
SN-501	Ink Marking Line	VOC	0.3	1.3
SN-315	Primer/Laminating Machine (with thermal oxidizer)	VOC	1.1	3.8
SN-403	Heater (Natural Gas-fired)	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.6	0.3 0.1 0.1 0.5 2.4
SN-16A	Boiler #1 (Natural Gas)	PM_{10} SO_2 VOC CO NO_x	1.1 0.1 0.2 2.7 10.6	**
SN-16B	Boiler #2 (Natural Gas)	PM_{10} SO_2 VOC CO NO_x	1.1 0.1 0.2 2.7 10.6	**

SN	Description	Pollutant	lb/hr	Tpy
	Total Annual Emissions, Both Boilers	PM_{10} SO_2 VOC CO NO_x	**	5.7 0.3 1.2 14.6 58.5

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

Table 3 - Non-Criteria Pollutants

SN	Description	Pollutant	lb/hr	tpy
STORAGE and TRANSFER				
SN-01A	Carbon Black Storage Tank No. 1	PM	2.0	3.3
SN-01B	Carbon Black Storage Tank No. 2	PM	2.0	
SN-101A	Carbon Black Storage Tank No. 3	PM	1.5	3.3
SN-101B	Carbon Black Storage Tank No. 4	PM	1.5	
SN-201	Carbon Black Storage Tank No. 5	PM	1.5	
SN-17A	Carbon Black Transfer	PM	0.8	3.3
SN-17B	Carbon Black Transfer	PM	0.8	
SN-301A	Carbon Black Rail Unloading #1	PM	0.1	0.1
SN-304	Carbon Black Rail Unloading #2	PM	0.1	0.2
SN-18A	Carbon Black Surge Hopper K	PM	0.8	0.8
SN-18B	Carbon Black Surge Hopper K	PM	0.8	
SN-118	Carbon Black Surge Hopper K2	PM	0.8	0.8
SN-305	Carbon Black Surge Bin	PM	0.8	
SN-307	Kaolin Clay Silo A	PM	1.5	0.9
SN-308	Kaolin Clay Silo B	PM	1.5	
SN-309A	Kaolin Clay Surge Bin	PM	1.5	0.9
SN-309B	Kaolin Clay Surge Bin	PM	1.5	
SN-310	Kaolin Clay Railcar Circulation	PM	0.9	1.8
SN-311	Kaolin Clay Railcar Unloading	PM	0.9	
BLACK LINE				

SN	Description	Pollutant	lb/hr	tpy
SN-02A	Pigment Blender K #1	PM	0.5	0.3
SN-02B	Pigment Blender K #2	PM	0.5	
SN-102	Pigment Blender K2	PM	0.1	
SN-103	Banbury Mixer K2 Baghouse (Inlet)	PM	0.5	2.3
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		POC	0.02	*
		Ethylbenzene	0.01	*
		Hexane	0.03	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.03	*
SN-104	Banbury Mixer K2 Baghouse (Discharge)	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		POC	0.02	*
		Ethylbenzene	0.01	*
		Hexane	0.02	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.02	*
SN-109	Slab Mill and Soap Dip Tank K2	PM	0.1	0.1
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		POC	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.02	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.02	*

SN	Description	Pollutant	lb/hr	tpy
SN-15	Slab Dip Mix Tank	PM	0.8	4.0
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		POC	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.01	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.01	*
SN-03	Banbury Mixer K1 Baghouse (Inlet, Discharge & Drop Mill)	PM	0.7	2.7
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		POC	0.02	*
		Ethylbenzene	0.01	*
		Hexane	0.03	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.03	*
SN-04	Removed (Emissions routed through SN-03)			
SN-20	Removed (Emissions routed through SN-03)			
SN-09	Slab Mill and Soap Dip Tank	PM	0.1	0.1
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		POC	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.02	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.02	*

SN	Description	Pollutant	lb/hr	tpy
SN-11	Breakdown Mill	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.01	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.01	*
SN-10	Strainer Mill #1	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.02	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.02	*
SN-12	Strainer Mill #2	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.03	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.03	*

SN	Description	Pollutant	lb/hr	tpy
SN-13	Troesters	PM	0.2	0.9
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.01	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.01	*
SN-14	On Line Calendar	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.01	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.01	*
SN-19	Solvent Storage	Not Currently In Use		
SN-119	Solvent Storage	Not Currently In Use		
SN-306	Duster (Emission Point 1)	PM	0.3	1.3
SN-07	Duster (Emission Point 2)	PM	0.3	1.5
WHITE LINE				
SN-202	Pigment Blenders #11	PM	2.0	1.2
SN-203	Banbury Mixer #11 (Inlet)	PM	0.8	3.1

SN	Description	Pollutant	lb/hr	tpy
SN-204	Banbury Mixer #11 (Discharge)	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		POC	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.01	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.01	*
SN-205	Drop Mill and Slab Mill #11	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		POC	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.01	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.01	*
SN-115	Slab Dip Mix Tank #11	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		POC	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.01	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.01	*
Z-CALENDAR LINE				

SN	Description	Pollutant	lb/hr	tpy
SN-323A	Troester #1	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.01	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.01	*
SN-323B	Troester #2	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.01	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.01	*
SN-114	Calendar	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.01	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.01	*

SN	Description	Pollutant	lb/hr	tpy
SN-116	Calendar Vacuum	PM	0.1	0.4
		1,3-Butadiene	0.01	*
		MEK	0.01	*
		Cumene	0.01	*
		Ethylbenzene	0.01	*
		Hexane	0.01	*
		m- and p-Xylene	0.01	*
		o-Xylene	0.01	*
		Dichloromethane	0.01	*
		Nickel Compounds	0.01	*
		Phenol	0.01	*
		Toluene	0.01	*
SN-107	Duster #2	PM	0.3	1.3
SN-302	Wind Up Unit #2	PM	0.2	0.9
SN-303	Wrapping Unit #2	PM	0.1	0.2
SN-08A	Autoclave #1	MEK	0.02	*
		Benzene	0.23	*
		Cumene	0.02	*
		Epichlorohydrin	0.02	*
		Ethylbenzene	0.03	*
		Hexane	0.04	*
		m- and p-Xylene	0.15	*
		o-Xylene	0.04	*
		Dichloromethane	0.03	*
		Phenol	0.01	*
		Toluene	0.18	*
SN-08B	Autoclave #2	MEK	0.02	*
		Benzene	0.23	*
		Cumene	0.02	*
		Epichlorohydrin	0.02	*
		Ethylbenzene	0.03	*
		Hexane	0.04	*
		m- and p-Xylene	0.15	*
		o-Xylene	0.04	*
		Dichloromethane	0.03	*
		Phenol	0.01	*
		Toluene	0.18	*

SN	Description	Pollutant	lb/hr	tpy
SN-08C	Autoclave #3	MEK	0.02	*
		Benzene	0.23	*
		Cumene	0.02	*
		Epichlorohydrin	0.02	*
		Ethylbenzene	0.03	*
		Hexane	0.04	*
		m- and p-Xylene	0.15	*
		o-Xylene	0.04	*
		Dichloromethane	0.03	*
		Phenol	0.01	*
		Toluene	0.18	*
SN-08D	Autoclave #4	MEK	0.02	*
		Benzene	0.23	*
		Cumene	0.02	*
		Epichlorohydrin	0.02	*
		Ethylbenzene	0.03	*
		Hexane	0.04	*
		m- and p-Xylene	0.15	*
		o-Xylene	0.04	*
		Dichloromethane	0.03	*
		Phenol	0.01	*
		Toluene	0.18	*
SN-08E	Autoclave #5	MEK	0.02	*
		Benzene	0.23	*
		Cumene	0.02	*
		Epichlorohydrin	0.02	*
		Ethylbenzene	0.03	*
		Hexane	0.04	*
		m- and p-Xylene	0.15	*
		o-Xylene	0.04	*
		Dichloromethane	0.03	*
		Phenol	0.01	*
		Toluene	0.18	*

SN	Description	Pollutant	lb/hr	tpy
SN-08F	Autoclave #6	MEK Benzene Cumene Epichlorohydrin Ethylbenzene Hexane m- and p-Xylene o-Xylene Dichloromethane Phenol Toluene	0.02 0.23 0.02 0.02 0.03 0.04 0.15 0.04 0.03 0.01 0.18	* * * * * * * * * * *
FLASHING LINE				
SN-206	Breakdown Mill	PM	0.1	0.4
SN-207	Feed Mill	PM	0.1	0.4
SN-330	Calendar	PM	0.1	0.4
TAPE LINE				
SN-312	Mixer #2 Mixer #3 Extruders	PM	0.2	0.8
SN-313	Tape System Warm Up Mill	PM	0.1	0.1
MISCELLANEOUS SOURCES				
SN-315	Primer/Laminating Machine (with thermal oxidizer)	Total HAP	1.08	4.72
SN-403	Heater (Natural Gas-fired)	PM	0.1	0.3
SN-16A	Boiler #1 (Natural Gas)	PM	1.1	–
SN-16B	Boiler #2 (Natural Gas)	PM	1.1	–
N/A	Total Annual Emissions, Both Boilers	PM	–	5.7
	Total Annual HAP Emissions from Calendaring Operations (SN's 11, 12[1], 13, 14, 323A, 323B, 114, 116)	1,3-Butadiene MEK Cumene Ethylbenzene Hexane m- and p-Xylene o-Xylene Dichloromethane Nickel Compounds Phenol Toluene	* * * * * * * * * * *	0.01 0.05 0.01 0.01 0.11 0.04 0.02 0.05 0.01 0.01 0.12

SN	Description	Pollutant	lb/hr	tpy
	Total Annual HAP Emissions from Curing Operations (SN's 08A, 08B, 08C, 08D, 08E and 08F)	MEK	*	0.20
		Benzene	*	3.27
		Cumene	*	0.24
		Epichlorohydrin	*	0.30
		Ethylbenzene	*	0.41
		Hexane	*	0.51
		m- and p-Xylene	*	2.12
		o-Xylene	*	0.55
		Dichloromethane	*	0.32
		Phenol	*	0.01
		Toluene	*	2.51
	Total Annual HAP Emissions from Mixing Operations (SN's 104, 120, 109, 15, 09, 03, 204, 205, 115)	1,3-Butadiene	*	0.03
		MEK	*	0.11
		Cumene	*	0.03
		POC	*	0.24
		Ethylbenzene	*	0.03
		Hexane	*	0.28
		m- and p-Xylene	*	0.10
		o-Xylene	*	0.04
		Dichloromethane	*	0.11
		Nickel Compounds	*	0.01
		Phenol	*	0.01
		Toluene	*	0.29
	Total Annual HAP Emissions from Extruding Operations SN-10 and SN-12[1]	1,3-Butadiene	*	0.01
		MEK	*	0.05
		Cumene	*	0.01
		Ethylbenzene	*	0.01
		Hexane	*	0.11
		m- and p-Xylene	*	0.04
		o-Xylene	*	0.02
		Dichloromethane	*	0.05
		Nickel Compounds	*	0.02
		Phenol	*	0.01
		Toluene	*	0.12

[1] emissions from SN-12 are generated from both calendaring and extruding processes.

*** lb/hr HAP emissions are given for each individual source. Tpy limits are given for a group of sources based on process classification.**

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

Table 4 - Visible Emissions

SN	Limit	Regulatory Citation

SN-15, 09, 11, 10, 12, 13, 14, 115, 323A, 323B, 206, 207, 330, 313	20%	§19.503
All Other Sources	5%	§18.501

4. The permittee will not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [§18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]

5. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN- 1 Conditions

6. The permittee shall not process more than 30 tons per month or in excess of 350 tons per continuous 12-month period of mineral oil in the slab dip units. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. The permittee shall not use any mineral oil at the facility that contains VOCs in excess of 5 percent by weight. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

8. The permittee shall maintain monthly records which demonstrate compliance with Specific Conditions #6 and #7. These records shall indicate each month's usage of mineral oil, and shall indicate the VOC content (in wt. %) for all mineral oils used during each month. Records shall be updated by the fifteenth 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. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

9. The permittee shall not use in excess of 11.0 gallons per month or 130 gallons per consecutive 12-month period of solvent for cold cleaning parts. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

10. The permittee shall not use any solvent at the facility for cold cleaning parts which contains VOC in excess of 8.9 pounds per gallon. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

11. The permittee shall maintain monthly records which demonstrate compliance with Specific Conditions #9 and #10. These records shall indicate each month's usage of solvent, and shall indicate the VOC content (in lb/gal) for each solvent used during each month. Records shall be updated by the fifteenth 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. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

12. The permittee shall not use in excess of 370 gallons per consecutive 12-month period of total inks and cleaners. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

13. The permittee shall not use any inks or cleaners at the facility which contain VOC in excess of 7.0 pounds per gallon. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

14. The permittee shall maintain monthly records which demonstrate compliance with Specific Conditions #12 and #13. These records shall indicate each month's usage of total inks and cleaners, and shall indicate the VOC content (in lb/gal) for each ink or cleaner used during each month. Records shall be updated by the fifteenth 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. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

15. The permittee shall not use any solvent in either of the two primer machines (SN-315) which contains VOC in excess of 6.62 pounds per gallon. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

16. The permittee shall not use any solvent in either of the two primer machines (SN-315) which contains in excess of 6.62 pounds per gallon of combined HAPs and/or air contaminants. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

17. The permittee shall maintain records which demonstrate compliance with Specific Conditions #15 and #16. These records shall indicate the VOC content (in lb/gal) and the HAP and/or air contaminant content (in lb/gal) for each primer used at SN-315. Records shall be updated as necessary whenever a new solvent is used at SN-315. These records shall be kept on site, and shall be made available to Department personnel upon request. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and/or §18.1004 of Regulation 18]

18. The permittee shall not use any solvent at the primer machine (SN-315) which contains any HAP or air contaminant with a TLV value lower than 100 mg/m^3. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

19. The permittee shall maintain records of the ACGIH TLV values as listed on current MSDS forms, or in the most recently published ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs) for each HAP and/or air contaminant-containing material used at SN-315. The TLV for each HAP and/or air contaminant (in mg/m^3) should be noted on these records. These records shall be maintained in a spreadsheet, database, or other well organized format. These records

shall be updated as necessary whenever a new solvent is used at SN-315, kept on-site, and made available to Department personnel upon request. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

20. The permittee shall not use more than 40.0 gallons of solvent at the primer machine (SN-315) during any consecutive 24-hour period. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and/or §18.1004 of Regulation 18]

21. The permittee shall maintain daily records which demonstrate compliance with Specific Condition #20. These records shall be maintained on-site in a spreadsheet, database, or other well organized format. The records shall be updated daily, and shall be made available to Department personnel upon request. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and/or §18.1004 of Regulation 18]

22. The primer machine thermal oxidizer (SN-315) shall be operated at a temperature greater than 1400° F at all times. This shall be verified by the installation of a continuous temperature monitor and recorder. Records of the temperature recordings shall be maintained on-site, and shall be made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

23. Total combined annual rubber production through Banbury Mixers K1 and K2 shall not exceed 432 million pounds per consecutive 12-month period. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

24. The facility shall not further process more than 316 million pounds of rubber that is mixed in Banbury Mixers K1 and K2. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

25. The permittee shall maintain records which demonstrate compliance with Specific Conditions #23 and #24. These records shall indicate the amount of rubber produced at each Banbury Mixer (SN-03 and SN-103) during each month and the amount of mixed rubber which is shipped off-site for further processing during each month. The amount of rubber that is shipped off-site for further processing shall be subtracted from the total amount of rubber processed through mixers K1 and K2 in order to determine compliance with the limit found in Specific Condition #24. These records shall be updated by the 15th day of the month following the month to which the records pertain. A 12-month rolling total and each individual month's data shall be maintained on-site and shall be made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

26. The permittee shall perform compliance testing for PM and VOC on the K1 and K2 Banbury Mixers replacement baghouses. If any PM test fails, the PM tests are to be repeated AND additionally PM_{10} tests are to be completed. All testing shall be performed when the mixers are operating at or above 90% of maximum rubber mixing capacity. Testing shall be performed for SN-03, SN-103, and SN-104 on or before June

15, 2006 in accordance with the following US EPA reference test methods, Table 5. This testing shall be used to determine compliance with the pound per hour emission limits for these sources found in Specific Conditions #1 and #2. The results of this testing shall be submitted to the Department in accordance with Specific Condition #27. In addition, the results of this testing shall be maintained on-site and shall be made available to Department personnel upon request. [§19.702 of Regulation #19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Table 5 – US-EPA Testing

Pollutant	Test Methods	Condition
PM	5 and 202	Must be done Simultaneously
PM_{10}	201A and 202	Required ONLY if initial PM tests fail
VOC	25A and 18	n/a

27. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days of completion of testing but no later than July 15, 2006, whichever date is earliest. The permittee shall on or before September 1, 2006, submit to the Department an air permit application to modify the air permit to reflect appropriate emissions based on its usage of the modified raw rubber product. [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

28. Total rubber production through Banbury Mixer 11 (SN-203) shall not exceed 7 million pounds per month or 70 million pounds per year. Compliance with annual limits shall be determined on a 12 month rolling average basis. The permittee shall maintain records of rubber production at SN-203. Records shall be maintained on a monthly basis and updated by the 5th day of the following month. Records shall be kept on site and provided to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

29. The permittee shall not operate Boiler #1 (SN-16A) and Boiler #2 (SN-16B) in excess of 2,232 hours per year simultaneously. The permittee may alternate boiler use the remaining 6,528 hours per year, as desired. The permittee shall maintain hours of operation records for both boilers to verify compliance with this condition. Records shall be kept on site and provided to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

30. The permittee shall use only natural gas to fuel Boiler #1 (SN-16A) and Boiler #2 (SN-16B). In the event of a natural gas curtailment, the permittee, as provided for in §18.1102 of Regulation 18 (Air Code), may use an alternate fuel to fire the boilers. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

31. Natural gas usage, for the purpose of firing Boiler #1 (SN-16A) and Boiler #2 (SN-16B), shall not exceed 73.6 million standard cubic feet per month or 882.6 million standard cubic feet per year. Firestone shall keep records of natural gas usage to verify compliance with this condition. Records shall be updated on a monthly basis. Records shall be kept on site and provided to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

32. The permittee is authorized to test start the emergency diesel fire pump and the emergency diesel generator once per week for the purpose of verifying the proper working condition of the equipment. The test start is intended only as a safety check. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Section V: INSIGNIFICANT ACTIVITIES

The Department 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 Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated **September 29, 2005.**

Table 5 - Insignificant Activities

Description	Category
Seam Tape Testing Lab Vent	A-5

Section VI: GENERAL CONDITIONS

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

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

3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [§19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [§19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit; such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

8. The permittee will provide: [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

   a. Sampling ports adequate for applicable test methods;

   b. Safe sampling platforms;

   c. Safe access to sampling platforms;

   d. Utilities for sampling and testing equipment.

9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [§19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [§19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

    a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.

b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.

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

11. The permittee will allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;

b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;

c. To inspect any monitoring equipment or monitoring method required in this permit;

d. To sample any emission of pollutants; and

e. To perform an operation and maintenance inspection of the permitted source.

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

13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [§19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30)

days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [§19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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

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

17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]