# ADEQ MINOR SOURCE AIR PERMIT

Permit #: 810-AR-3

IS ISSUED TO:

Farr Company 3501 Airport Rd. Jonesboro, AR 72401 Craighead County CSN: 16-0008

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

Signed:

Keith A. Michaels Chief, Air Division Date

# SECTION I: FACILITY INFORMATION

PERMITTEE:	Farr Company
CSN:	16-0008
PERMIT NUMBER:	810-AR-3
FACILITY ADDRESS:	3501 Airport Rd. Jonesboro, AR 72401
COUNTY:	Craighead
CONTACT POSITION:	Jesse Carter
TELEPHONE NUMBER:	(870) 933-8048
<b>REVIEWING ENGINEER:</b>	

#### SECTION II: INTRODUCTION

#### **Summary**

Farr Company (Farr) manufactures metal industrial filter housings (SIC Code 3479/3496) at 3501 Airport Road, Jonesboro, AR. This modification will allow Farr to construct new paint booths located in the facility's Low Bay and High Bay manufacturing areas and raise the total allowable VOC content of the Low Bay Paint Booths (SN-01, 02 and 13) to 7.98 lb/gal. This construction and change in VOC content will cause an increase in total annual VOC emissions of 22.0 tons per year. New cutting and welding equipment added to the facility's operations will cause an increase in total annual PM/PM<sub>10</sub> emissions from existing permitted sources SN-07 thru SN-12. Additionally, this permit accounts for the removal of an incinerator (SN-06) within the process.

#### **Process Description**

The manufacturing of industrial metal filter housings takes place at Farr in two separate buildings referred to as the Low Bay and the High Bay areas. Although these processes are essentially the same, a process flow description is outlined for each area.

#### Low Bay

Metal stock is first sheared or cut to size by sawing. These parts are drilled, punched or notched, and rolled or formed to model specifications. At this point, the metal housing parts enter a phosphatizer, called a Bonderiser, which etches the surface to prepare the metal for painting. From the Bonderiser, the metal parts are welded together to form the housings. Emissions from cutting, drilling, punching, and welding are accounted for in SN-7 thru 12. After welding, the housings are grinded and brushed to remove slag. The housings are wiped down by hand and then painted in one of two paint booths. The larger existing paint booth in the Low Bay area (SN-01) can apply either a primer or an enamel top coat. A new paint booth (SN-13) that is proposed to be installed in this area will perform the same function as the existing larger paint booth. The smaller of the two existing paint booths (SN-02) applies a black enamel paint to the housings if specified. A finish assembly is then conducted on each unit where covers and/or doors may be added. Finished units may also be tested during this stage to assure proper function. Units then go to shipping to be crated and delivered to the customer.

#### <u>High Bay</u>

The High Bay area is used to fabricate large filter housings. Metal stock is sheared or cut to size by sawing, it is then drilled or notched depending on the type of housing being produced. The metal is then rolled or formed to model specifications. At this point some metal housing parts may be taken to the Low Bay Bonderiser for surface etching, but the majority are steam cleaned at the High Bay area. The metal parts are welded together and then sandblasted (SN-03). Excess sand is cleared from the surface and the units are grinded to remove slag. New sources for PM/PM<sub>10</sub> emissions are proposed for the High Bay area due to the addition of a plasma cutter and increased welding operations (SN-16 thru SN-19). The filter housings are then painted in the existing paint booth (SN-04 and 05). A new paint booth (SN-14 and 15) is proposed to be installed which will perform the

same function as the existing paint booth. After painting, the units are assembled and tested to ensure proper function. Units are then crated and shipped to the customer.

#### Regulations

Farr Company, Inc. is subject to the Arkansas Air Pollution Control Code (Regulation 18) and the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19).

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	2.4	6.4
$PM_{10}$	2.4	6.4
$SO_2$	-	-
VOC	335.3	75.0
СО	-	-
NO <sub>x</sub>	-	-
HAP (Total)	335.3	24.5
HAP (Individual)	-	9.5

The following table is a summary of the facilities total emissions.

#### SECTION III: PERMIT HISTORY

- 810-A This is the first operating permit (issued 3/2/88) for Farr Company at Jonesboro after purchasing the facility formerly owned by Crane Company. Processes include paint operations, curing, and welding to produce industrial filters.
- 810-AR-1 This permit modification (issued 7/9/90) covers the installation of a new spray paint booth and additional process equipment. A permitted emission rate was set for VOC emissions.
- 810-AR-2 This permit (issued 3/16/95) covers modifications at the facility that included the removal of several ovens and the increase in size of one paint booth and filter increase.

#### SECTION IV: EMISSION UNIT INFORMATION

#### **Specific Conditions**

1. Pursuant to \$19.501 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. \$8-4-203 as referenced by \$8-4-304 and \$8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
01 02 04 05 13 14 15	Low Bay Paint Booth #1 Low Bay Paint Booth #2 High Bay P. Booth #1, Stack #1 High Bay P. Booth #1, Stack #2 Low Bay Paint Booth #3 High Bay P. Booth #2, Stack #1 High Bay P. Booth #2, Stack #2	VOC	335.3	75.0
03	Dust Collector	$PM_{10}$	0.4	0.4
07	Welding Roof Vent, Low Bay	$PM_{10}$	0.2	0.6
08	Welding Roof Vent, Low Bay	$PM_{10}$	0.2	0.6
09	Welding Roof Vent, Low Bay	$PM_{10}$	0.2	0.6
10	Welding Roof Vent, Low Bay	$PM_{10}$	0.2	0.6
11	Welding Roof Vent, Low Bay	$PM_{10}$	0.2	0.6
12	Welding Roof Vent, Low Bay	$PM_{10}$	0.2	0.6
16	Welding Roof Vent, High Bay	$PM_{10}$	0.2	0.6
17	Welding Roof Vent, High Bay	$PM_{10}$	0.2	0.6
18	Welding Roof Vent, High Bay	$PM_{10}$	0.2	0.6
19	Welding Roof Vent, High Bay	$PM_{10}$	0.2	0.6

2. Pursuant to \$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, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
01 02 04 05 13 14 15	Low Bay Paint Booth #1 Low Bay Paint Booth #2 High Bay P. Booth #1, Stack #1 High Bay P. Booth #1, Stack #2 Low Bay Paint Booth #3 High Bay P. Booth #2, Stack #1 High Bay P. Booth #2, Stack #2	НАР	335.3	24.5
03	Dust Collector	РМ	0.4	0.4
07	Welding Roof Vent, Low Bay	РМ	0.2	0.6
08	Welding Roof Vent, Low Bay	РМ	0.2	0.6
09	Welding Roof Vent, Low Bay	РМ	0.2	0.6
10	Welding Roof Vent, Low Bay	РМ	0.2	0.6
11	Welding Roof Vent, Low Bay	РМ	0.2	0.6
12	Welding Roof Vent, Low Bay	РМ	0.2	0.6
16	Welding Roof Vent, High Bay	РМ	0.2	0.6
17	Welding Roof Vent, High Bay	PM	0.2	0.6
18	Welding Roof Vent, High Bay	РМ	0.2	0.6
19	Welding Roof Vent, High Bay	РМ	0.2	0.6

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

SN	Limit	Reg. Citation
03 07 08 09 10 11 12 16 17 18 19	5%	§18.501

- 4. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 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 Regulation #18, if the emission of the air contaminant constitutes air pollution within the meeting of A.C.A. §8-4-303.
- 5. Pursuant to \$18.901 of Regulation 18, and A.C.A. \$8-4-203 as referenced by \$8-4-304 and \$8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.
- 6. Pursuant to \$18.1004 of Regulation 18, and A.C.A. \$8-4-203 as referenced by \$8-4-304 and \$8-4-311, the permittee shall not use any compounds in the spray booths that contain HAPs, as listed in CAA \$112(b)(1), unless it is within the weight percent limits described in the table below and the HAP is also classified as a VOC. Compliance with this condition is shown through Specific Condition No. 7.

Minimum HAP TLV (mg/m <sup>3</sup> )	Allowable HAP Content Per Coating (weight %)
174.29	100
156.86	90
139.43	80

Minimum HAP TLV (mg/m <sup>3</sup> )	Allowable HAP Content Per Coating (weight %)
122.00	70
104.57	60
87.15	50
69.72	40
52.29	30
34.86	20
17.43	10
8.72	5
1.75	1

- 7. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall show compliance with Specific Condition No. 6 by using ACGIH TLV values as listed on current MSDS forms, or in the ACGIH handbook of <u>Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs)</u>. The permittee shall update all TLV values before February 28 of each year. Monthly records shall be maintained in the form of Attachment A, or similar format, to show compliance with this condition. Records shall be updated by the fifteenth day of the month following the month for which the records pertain. These records shall be kept on site, provided to Department personnel upon request and may be used by the Department for enforcement purposes.
- 8. Pursuant to \$18.1004 of Regulation 18, and A.C.A. \$8-4-203 as referenced by \$8-4-304 and \$8-4-311, the permittee shall use no more than 18,800 gallons of all coatings, combined, per any twelve consecutive month period. Compliance with this condition is shown through Specific Condition No. 10.
- 9. Pursuant to \$19.705 of Regulation 19, and A.C.A. \$8-4-203 as referenced by \$8-4-304 and \$8-4-311, the permittee shall use no coating with a VOC content of more than 7.98 lb/gal at this facility. Compliance with this condition is shown by Specific Condition No. 10.
- 10. Pursuant to §19.705 of Regulation 19, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records and MSDS that show compliance with VOC emissions limits and content. These records shall be kept in the form of Attachment B, or similar format, along with records for HAP emissions. Records shall be updated by the fifteenth day of the month following the month for which the records pertain. These records

shall be kept on site, provided to Department personnel upon request and may be used by the Department for enforcement purposes.

- 11. Pursuant to \$19.303 of Regulation 19, and A.C.A. \$8-4-203 as referenced by \$8-4-304 and \$8-4-311, the permittee shall maintain a baghouse control device on the sandblasting operation (SN-03) to control particulate emissions. The baghouse shall be operated at all times when sandblasting is operated.
- 12. Pursuant to \$19.703 of Regulation 19, and A.C.A. \$8-4-203 as referenced by \$8-4-304 and \$8-4-311, the permittee shall maintain a pressure drop measurement device on the baghouse (SN-03). Pressure drop shall be maintained between 1.5 and 2.25 inches of water. The permittee shall keep a log of pressure drop readings. Pressure drop shall be recorded at a minimum of once per week. If the pressure drop is less than 1.5 inches of water or exceeds 2.25 inches of water, the appropriate maintenance measures shall be taken to return the baghouse to proper working condition. The permittee shall maintain records of any maintenance performed on the baghouse.
- 13. Pursuant to \$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, the permittee shall not exceed 24.5 TPY of total HAP emissions, or 9.5 TPY of any individual HAP at the facility per consecutive 12 month period.
- 14. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #13. Records shall be updated by the fifteenth day of the month following the month for which records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. A twelve month rolling total and each individual month's data shall be submitted in accordance with General Condition 6. The permittee shall demonstrate that the degree of accuracy of the calculations used to determine emissions is sufficient to prove that the major source thresholds have not been exceeded.
- 15. Air Permit 810-AR-3 shall void and supersede any air permits previously issued to this facility. Permit 810-AR-2 is hereby revoked.

#### SECTION V: GENERAL CONDITIONS

- 1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas 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. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall 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 thereunder.
- 3. Pursuant to \$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, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
- 4. Pursuant to \$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, construction or modification must commence within eighteen (18) months from the date of permit issuance.
- 5. Pursuant to §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, records must be kept for five years which will 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 records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.
- 6. Pursuant to §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, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

Arkansas Department of Environmental Quality Air Division

ATTN: Compliance Inspector Supervisor Post Office Box 8913 Little Rock, AR 72219

- 7. Pursuant to §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, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
- 8. Pursuant to \$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, the permittee shall provide:
  - 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. Pursuant to \$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, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
- 10. Pursuant to \$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, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall 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:
  - 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 that all reasonable measures have been taken 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 shall 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, it need not be submitted again.

- 11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
  - 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
  - e. To perform an operation and maintenance inspection of the permitted source
- 12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued 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.
- 13. Pursuant to \$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, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
- 14. Pursuant to \$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, this permit may be transferred. An applicant for a transfer shall 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. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
- 15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
- 16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

**APPENDIX** A

# **APPENDIX B**

**APPENDIX C** 

# AIR DIVISION

# **INVOICE REQUEST FORM**

(3-99)

**Facility Name & Address:** Farr Company P.O. Box 9080 Jonesboro, Arkansas 72403

**CSN**: 16-0008

Permit No: 810-AR-3

Minor Source Permit Description: MS

# **Initial Fee Calculations:**

**Minor Source** = **3**(18.08)(TPY predominant pollutant, except CO)

No less than \$500

# **Mod Fee Calculations:**

**Minor Source** = **3** (18.08)(22.0 TPY) = \$397.76

No less than \$400

F = \$400.00

Fee Amount: \$400.00

Engineer:Kale HannerDate:October 12, 2001

#### Public Notice

Pursuant to A.C.A. §8-4-203, and the regulations promulgated thereunder, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Farr Company (Farr) manufactures metal industrial filter housings (SIC Code 3479/3496) at 3501 Airport Road, Jonesboro, Arkansas 72401. This modification will allow Farr to construct new paint booths located in the facility's Low Bay and High Bay manufacturing areas and raise the total allowable VOC content of the Low Bay Paint Booths (SN-01, 02 and 13) to 7.98 lb/gal. This construction and change in VOC content will cause an increase in total annual VOC emissions of 22.0 tons per year. New cutting and welding equipment added to the facility's operations will cause an increase in total annual PM and PM<sub>10</sub> emissions from existing permitted sources SN-07 thru SN-12. The facility also wishes to modify the permit to reflect the replacement of dry paint booth filters currently used in all paint booths with paint arrestor overspray collectors. This facility is currently subject to regulation under the *Arkansas Air Pollution Control Code* (Air Code) and the *Arkansas Plan of Implementation for Air Pollution Control* (SIP).

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp, Information Officer. Citizens desiring technical information concerning the application or permit should contact Kale Hanner, Engineer. Both Rhonda Sharp and Kale Hanner can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Crowley Ridge Regional Library, 315 West Oak, Jonesboro, Arkansas, 72401. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8).

Dated this

Randall Mathis Director