

# ADEQ OPERATING AIR PERMIT

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

Permit #: 814-AOP-R1  
Renewal #1

IS ISSUED TO:

Correll, Inc.  
300 South Hancock  
Charleston, AR 72933  
Franklin County  
CSN: 24-0057

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

and

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Keith A. Michaels

Date

**SECTION I: FACILITY INFORMATION**

PERMITTEE: Correll, Inc.  
CSN: 24-0057  
PERMIT NUMBER: 814-AOP-R1

FACILITY ADDRESS: 300 South Hancock  
Charleston, AR 72933

COUNTY: Franklin

CONTACT POSITION: Steve Sherriff  
TELEPHONE NUMBER: 731-635-3421

REVIEWING ENGINEER: Kimberly Lindsey

UTM North-South (Y): Zone 15 [ 3906.1]  
UTM East-West (X): Zone 15 [ 405.7]

**Correll, Inc.**  
**Permit #: 814-AOP-R1**  
**CSN #: 24-0057**

## **SECTION II: INTRODUCTION**

### **Summary of Permit Activity**

Correll, Inc. owns and operates a facility in Charleston, AR which manufactures tables, bookcases, and computer furniture. The furniture is assembled from metal and particle board. In the manufacturing process, metal parts are fabricated, particle board is laminated and cut to size, and then the two are assembled. This permitting action is to renew the facility's existing permit.

The small parts washer (SN-14) emissions will change due to the use of a different solvent. HAP emissions will be 0.002 tons per year of Napthalene, 0.014 tons per year of Xylene, and 0.002 tons per year of Ethylbenzene. VOC and Toluene emissions will be 2.0 and 0.18 tons per year, respectively, from touch-up painting (SN-16). **Correll, Inc. submitted comments on the draft air permit. Correll requested to remove two cyclones (SN-09 & SN-10) and replace the cyclones with a bag filter (SN-15). Also Correll submitted new emission summary tables for SN-03, SN-04, and SN-11 due to updated MSDS's for the paints used at this source.**

### **Process Description**

#### *Metal Legs and Aprons*

Tubular steel and strip steel are cut to correct lengths, bent to desired shapes, and punched. These pieces are then welded together to form the table legs and aprons. The parts are placed on a conveyor and then proceed through a unit that cleans them in a recirculating caustic cleaner and coats them in a recirculating phosphitizer (SN-01) for paint adhesion. The parts are then dried in a natural gas fired dryer (SN-02). The conveyor carries the parts to the paint booths (SN-03, 04, and 11) where enamel paint is applied electrostatically. After drying in an oven (SN-05), the parts are taken to be assembled.

#### *Table Tops and Shelves*

Particle board is processed by applying a thin paper laminate or formica laminate to one side using heat and pressure. The laminate contains a layer of hot glue applied to one side. This forms the top of the table. Particle board for the bookcases have the paper or formica sheets attached by a water-based glue. Some small pieces are prepared with the use of an aerosol adhesive. No stains or paints or other materials are used on any wood or particle board at the facility. After the lamination process, the boards are cut to the correct size. The edges are then routed so that a plastic band may be placed around the table top. Sawdust from this operation is collected by cyclones (SN-09, SN-10, and SN-13). Some pieces may require sanding or drilling.

Once the table tops are completed, they are assembled with the lower apron and legs. The finished product is ready for sale. This completes the manufacturing process at the facility.

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### **Regulations**

This facility is subject to regulations under the *Arkansas Air Pollution Control Code* (Regulation 18), the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulations of the Arkansas Operating Air Permit Program* (Regulation 26).

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The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	2.93	26.9	
		PM <sub>10</sub>	2.93	26.9	
		SO <sub>2</sub>	0.022	0.3	
		VOC	113.61	244.9	
		CO	0.12	0.6	
		NO <sub>x</sub>	0.71	2.3	
		Phosphoric Acid	0.12	0.5	
		Molybdic Acid	0.02	0.1	
		Copper Sulfate	0.02	0.1	
		Xylene*	28.21	54.0	
		Toluene*	17.46	37.0	
		Ethyl Benzene*	8.72	11.0	
		Hexane*	1.4	1.2	
		Napthalene	5.55	12.78	
		Glycol Ether	1.29	2.95	
SN-01	Phosphate Washer	PM/PM <sub>10</sub>	0.01	0.1	10
		SO <sub>2</sub>	0.01	0.1	
		VOC	0.01	0.1	
		CO	0.06	0.4	
		NO <sub>x</sub>	0.40	1.7	
		Phosphoric acid	0.12	0.5	
		Molybdic acid	0.02	0.1	
		Copper sulfate	0.02	0.1	
SN-02	Drying Oven	PM/PM <sub>10</sub>	0.01	0.1	12
		SO <sub>2</sub>	0.01	0.1	
		VOC	0.01	0.1	
		CO	0.03	0.1	
		NO <sub>x</sub>	0.11	0.5	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-03, SN-04, and SN-11	(2) Electrostatic Paint Booths and (2) Touch up Booths	VOC	102.5	235.8	14
		Xylene*	28.2	64.6	
		Toluene*	17.4	39.96	
		Ethyl benzene*	8.72	19.98	
		Glycol Ether	1.29	2.95	
		Napthalene	5.55	12.78	
SN-05 and SN-06	Paint Bake Oven	PM/PM <sub>10</sub>	0.01	0.1	15
		SO <sub>2</sub>	0.01	0.1	
		VOC	0.04	0.1	
		CO	0.03	0.1	
		NO <sub>x</sub>	0.2	0.1	
SN-07	Aersol Spray Adhesive	VOC	10.4	8.6	17
		Hexane	1.4	1.2	
SN-08	Removed From Service Permit 814-AOP-R0				
SN-09, SN-10	Removed From Service Permit 814-AOP-R1				
SN-13, SN-15	Sawdust Cyclone & Sawdust Handling & Baghouse	PM/PM <sub>10</sub>	3.8	13.1	18
SN-12	Removed From Service Permit 814-AOP-R0				
SN-14	Parts Washer	VOC	0.1	0.2	19
		Napthalene*	0.001	0.002	
		Xylene*	0.01	0.014	
		Ethylbenzene*	0.001	0.002	
SN-16	Touchup Painting	VOC	0.47	2.0	20
		Toluene*	0.04	0.13	

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

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### **SECTION III: PERMIT HISTORY**

Air permit 814-A was issued to Correll, Inc. on June 5, 1987. This permit was the first air permit for this facility. The permit established VOC usage limits for the painting and laminating process. Allowable emission rates were also established for particulate matter and VOCs.

On August 20, 1990, Correll was issued air permit 814-AR-1. The modification included the installation of two new paint booths. The painting operation was originally installed in the 1970's and operated essentially unchanged until 1989. In 1989 a fire destroyed the two paint booths.

Air permit 814-AR-2 was issued to Correll, Inc. on April 7, 1992. This modification included the installation of a second cyclone in order to increase dust collection efficiency. No other changes were addressed in this permitting action.

On May 11, 1992, Correll, Inc. submitted an application proposing to modify air permit 814-AR-2. The facility proposed to install a touch-up spray paint booth to their existing operations. The hours of operation were also increased which caused an increase in paint and solvent usage. Air permit 814-AR-3 was issued to Correll, Inc. on July 13, 1992.

Air permit 814-AR-4 was issued to Correll, Inc. on June 21, 1993. The facility proposed to modify its existing permit to more accurately reflect actual operations at the facility and to allow for an expected increase in production over the next several years. Emissions from combustion sources were also added to the total allowable emissions.

Air permit 814-AOP-R0 is the first operating air permit issued to Correll, Inc. under Regulation 26. Four main changes have occurred at the facility. First, Correll no longer stains particle board, therefore, Roller Coater #1 (SN-08) was removed from service. VOC emissions from this source were allocated to the paint and touch-up booths. Second, the Process Equipment Coating process was eliminated. Next, a third cyclone was added to aid in sawdust collection. And finally, emissions from a small parts washer located in the maintenance shop were quantified.



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**SECTION IV: EMISSION UNIT INFORMATION**

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**SN-# 01**  
**Phosphate Washer**

**Source Description**

Metal legs and aprons are made from tubular or strip steel which has been cut to size, bent to desired shapes, and punched. The parts are then welded together and placed on a conveyor. The parts then proceed through a unit that clean the parts in a recirculating caustic cleaner. Next the parts are coated in a recirculating phosphitizer for paint adhesion.

**Specific Conditions**

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #4 and Plantwide Condition #7.

Pollutant	lb/hr	tpy
PM <sub>10</sub>	0.01	0.1
SO <sub>2</sub>	0.01	0.1
VOC	0.01	0.1
CO	0.06	0.4
NO <sub>x</sub>	0.40	1.7

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, 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.

Pollutant	lb/hr	tpy
PM	0.01	0.1
Phosphoric Acid	0.2	0.5
Molybdcic Acid	0.02	0.1

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Pollutant	lb/hr	tpy
Copper Sulfate	0.02	0.1

3. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, natural gas is the only fuel permitted for use in the phosphate washer.

**Correll, Inc.**  
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**SN-# 02**  
**Drying Oven**

**Source Description**

A natural gas fired oven is used to dry metal parts that have been sent through the phosphate washer. The oven which was installed in 1987 has a heat input capacity of 0.8 MMBtu/hr.

**Specific Conditions**

4. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #8 and Plantwide Condition #7.

Pollutant	lb/hr	tpy
PM <sub>10</sub>	0.01	0.1
SO <sub>2</sub>	0.01	0.1
VOC	0.01	0.1
CO	0.03	0.1
NO <sub>x</sub>	0.11	0.5

5. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, 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.

Pollutant	lb/hr	tpy
PM	0.01	0.1

6. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, natural gas is the only fuel permitted for use in the drying oven.

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**SN-03, SN-04, and SN-11**  
**Electrostatic Paint Booths and Touch Up Booths**

**Source Description**

Solvent based enamel paints are used to coat the metal parts in two (2) electrostatic paint booths (SN-03 and SN-04). The booths were installed in 1987. The touch-up paint booth (SN-11) is used to recoat parts which did not receive enough paint in the initial paint process. This booth was installed in 1992.

**Specific Conditions**

7. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Plantwide Condition #10.

Pollutant	lb/hr	tpy
VOC	102.5	235.8

8. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, 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. Compliance with this condition will be demonstrated by compliance with Plantwide Condition #11 .

Pollutant	lb/hr	tpy
Xylene	28.2	64.6
Toluene	17.43	39.96
Ethyl Benzene	8.72	19.98
Napthalene	5.55	12.78
Glycol Ether	1.29	2.95

**Correll, Inc.**  
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**SN-05 and SN-06**  
**Paint Bake Oven**

**Source Description**

After the metal parts of the tables are coated with paint, the parts are dried in a natural gas fired oven (SN-05 and SN-06). The oven which was installed in 1987 has a heat input capacity of 1.5 MMBTU/HR.

**Specific Conditions**

9. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #15 and Plantwide Condition #7.

Pollutant	lb/hr	tpy
PM <sub>10</sub>	0.01	0.1
SO <sub>2</sub>	0.01	0.1
VOC	0.04	0.1
CO	0.03	0.1
NO <sub>x</sub>	0.20	0.1

10. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, 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.

Pollutant	lb/hr	tpy
PM	0.01	0.1

11. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, natural gas is the only fuel permitted for use in the paint bake oven.

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**SN-07**  
**Cement Lamination**

**Source Description**

Particle board is processed by applying a thin paper laminate or formica laminate to one side using heat and pressure. The laminate contains a layer of hot glue applied to one side. This forms the top of the table. Particle board for the bookcases have the paper or formica sheets attached by a water-based glue. Some small pieces are prepared with the use of an aerosol adhesive. No stains or paints or other materials are used on any wood or particle board at the facility.

**Specific Conditions**

12. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Plantwide Condition #10.

Pollutant	lb/hr	tpy
VOC	10.4	8.5

13. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, 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. Compliance with this condition will be demonstrated by compliance with Plantwide Condition #11.

Pollutant	lb/hr	tpy
Hexane	1.4	1.2

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**SN-13 and SN-15**  
**Sawdust cyclone and Baghouse**

**Source Description**

After the lamination process, the boards are cut to the correct size. The edges are then routed so that a plastic band may be placed around the table top. Sawdust from this operation is collected by a cyclone and a baghouse (SN-13 and SN-15). The cyclone was installed in 1997. The baghouse was installed in 2002.

**Specific Conditions**

14. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

SN	Pollutant	lb/hr	tpy
13	PM <sub>10</sub>	2.8	9.1
15	PM <sub>10</sub>	1.0	4.0

15. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, 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	Pollutant	lb/hr	tpy
13	PM	2.8	9.1
15	PM	1.0	4.0

16. Pursuant to §18.501 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Correll shall not cause to be discharged to the atmosphere from the sawdust cyclone gases which exhibit an opacity greater than 10% as measured by EPA Reference Method 9. Correll shall not cause to be discharged to the atmosphere from the baghouse gases which exhibit an opacity greater than 5% as measured by EPA Reference Method 9. Compliance with this condition will be demonstrated by compliance with Plantwide Condition #9.



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17. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall inspect the cyclone, baghouse and sawdust collection bins each day of operation. The bin shall be monitored to insure that it does not overflow and that no visible emissions from the cyclone extend beyond the property line.

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**SN-14**  
**Parts Washer**

**Source Description**

A small parts washer located in the maintenance shop uses solvent to clean equipment parts from the process.

**Specific Conditions**

18. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Plantwide Condition #10.

Pollutant	lb/hr	tpy
VOC	0.1	0.2

19. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, 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. Compliance with this condition will be demonstrated by compliance with Plantwide Condition #11.

Pollutant	lb/hr	tpy
Napthalene	0.001	0.002
Xylene	0.010	0.014
Ethylbenzene	0.001	0.002

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**SN-16**  
**Touchup Painting**

**Source Description**

Touchup Painting is used to recoat parts that may have a visible blemish before the proceeding to assembly.

**Specific Conditions**

20. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

Pollutant	lb/hr	tpy
VOC	0.47	2.0

21. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, 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.

Pollutant	lb/hr	tpy
Toluene	0.04	0.18

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## **SECTION V: COMPLIANCE PLAN AND SCHEDULE**

Correll, Inc. is in compliance with the applicable regulations cited in the permit application. Correll, Inc. will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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## **SECTION VI: PLANTWIDE CONDITIONS**

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director 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.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. 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 or within 180 days of permit issuance if no date is specified. 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.
4. 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
5. Pursuant to §19.303 of Regulation 19 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.

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6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.
7. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, natural gas usage shall not exceed 31.6 million cubic feet during any consecutive twelve month period.
8. Pursuant to §19.705 of Regulation 19, 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 Plantwide Condition #7. Records shall be updated by the 20<sup>th</sup> day of the following month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.
9. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, weekly observations of the opacity from SN #13 and #15 shall be conducted by a person trained in EPA Reference Method 9. If visible emissions in excess of the permitted opacity are detected, Correll shall immediately take action to identify the cause of the excess visible emissions, implement corrective action, and document that visible emissions did not exceed the permitted opacity following the corrective action. Correll shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, kept on site, and made available to Department personnel upon request.
  - a. The date and time of the observation;
  - b. If visible emissions above the permitted limit were detected;
  - c. If visible emissions above the permitted limit were detected, list the cause of the exceedence of the opacity limits, the corrective action taken, and if the visible emissions are below the permitted limit after the corrective action was taken; and
  - d. The name of the person conducting the opacity observations.
10. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the usage and content limits set forth in the following table.

SN	Compound	Annual Limit (gal/yr)	Pollutant	Max. Content (lb/gal)
03, 04,11	Solvent Enamel	33,126 44,237	VOC	7.42 9.17
07	Aerosol	3,285	VOC	5.19

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SN	Compound	Annual Limit (gal/yr)	Pollutant	Max. Content (lb/gal)
	Adhesive			
14	Solvent	110	VOC	6.51

11. Pursuant to §18.1004 of Regulation 18, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the usage and content limits set forth in the following table.

SN	Compound	Annual Limit (gal/yr)	Pollutant	Max. Content (% weight)
03, 04, 11	Enamel	44,237	Xylene Toluene Ethyl Benzene Naphthalene Glycol Ether	29 20 10 1.6 1.6
03, 04, 11	Solvent	33, 126	Naphthalene	8
07	Solvent	3,285	Hexane	10
14	Solvent	110	Naphthalene Xylene Ethylbenzene	0.5 4 0.5

12. Pursuant to §19.705 of Regulation 19, §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 Plantwide Condition #10, #11. Records shall be updated by the 20<sup>th</sup> day of the following month to which the 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 Provision 7.
13. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee may substitute a non-permitted solvent for a permitted solvent provided that the following provisions are met:

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- a. The new solvent has an equal or greater TLV than the solvent it is replacing. The TLV shall be determined using the most up to date ACGIH data.
- b. The permittee shall notify the Department at least fifteen calendar days prior to the substitution taking place.
- c. The content of the new solvent is equal to or less than the permitted content of the solvent it is replacing. The permittee may partially substitute for a solvent as long as the permitted content of the current solvent is not exceeded by the new solvent and the remaining portion of the current solvent.

#### **Acid Rain (Title IV)**

14. Pursuant to §26.701 of Regulation #26 and 40 CFR 70.6(a)(4), the permittee is prohibited from causing any emissions which exceed any allowances that the source lawfully holds under Title IV of the Act or the regulations promulgated thereunder. No permit revision is required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. This permit establishes no limit on the number of allowances held by the permittee. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement of this permit or the Act. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Act.

#### **Title VI Provisions**

15. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
16. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:



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- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
17. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
18. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.
19. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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## **SECTION VII: INSIGNIFICANT ACTIVITIES**

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated March 15, 2002.

- \* welding operations
- \* diesel fire water pump
- \* unpaved parking lot
- \* heat lamination
- \* forklifts
- \* 500 gallon LPG tank

**Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.**

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### **SECTION VIII: GENERAL PROVISIONS**

1. Pursuant to 40 CFR 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000, this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.406 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 CFR 70.6(a)(1)(ii) and §26.701(A)(2) of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) of Regulation #26, records of monitoring information required by this permit shall include the following:
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;

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- e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

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

8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.701(C)(3)(b) of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
- a. The facility name and location,
  - b. The process unit or emission source which is deviating from the permit limit,
  - c. The permit limit, including the identification of pollutants, from which deviation occurs,
  - d. The date and time the deviation started,
  - e. The duration of the deviation,
  - f. The average emissions during the deviation,
  - g. The probable cause of such deviations,
  - h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
  - i. The name of the person submitting the report.

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A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 CFR 70.6(a)(5) and §26.701(E) of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
10. Pursuant to 40 CFR 70.6(a)(6)(i) and §26.701(F)(1) of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 CFR 70.6(a)(6)(ii) and §26.701(F)(2) of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
12. Pursuant to 40 CFR 70.6(a)(6)(iii) and §26.701(F)(3) of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.

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14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.701(F)(5) of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 CFR 70.6(a)(7) and §26.701(G) of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.701(H) of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 CFR 70.6(a)(9)(i) and §26.701(I)(1) of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 CFR 70.6(b) and §26.702(A) and (B) of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.
19. Pursuant to 40 CFR 70.6(c)(1) and §26.703(A) of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 CFR 70.6(c)(2) and §26.703(B) of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
  - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

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- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 CFR 70.6(c)(5) and §26.703(E)(3) of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
- a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The compliance status;
  - c. Whether compliance was continuous or intermittent;
  - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
  - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.704(C) of Regulation #26, nothing in this permit shall alter or affect the following:
- a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
  - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. 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.