

# ADEQ

ARKANSAS  
Department of Environmental Quality

March 5, 2008

Suzanne Siebenmorgen, Human Resources Manager  
Correll, Incorporated  
PO Box 417  
Charleston, AR 72933-0417

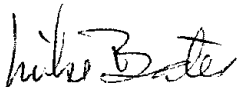
Dear Ms. Siebenmorgen:

The enclosed Permit No. 0814-AOP-R2 is issued pursuant to the Arkansas Operating Permit Program, Regulation # 26.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0814-AOP-R2 for the construction, operation and maintenance of an air pollution control system for Correll, Incorporated to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under §2.1.14 of Regulation No. 8, Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, within thirty (30) days after service of this decision.

All persons submitting written comments during this thirty (30) day period, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by §2.1.14 of Regulation No. 8.

Sincerely,



Mike Bates  
Chief, Air Division



# ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation No. 26:

**Permit No. : 0814-AOP-R2**

**Renewal #2**

**IS ISSUED TO:**

**Correll, Incorporated**

**300 South Hancock**

**Charleston, AR 72933**

**Franklin County**

**AFIN: 24-00057**

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:

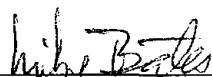
March 5, 2008

AND

March 4, 2013

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



\_\_\_\_\_  
Mike Bates, Chief  
Air Division

March 5, 2008

\_\_\_\_\_  
Date

Facility: Correll, Incorporated  
Permit No.: 0814-AOP-R2  
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**Table 1 – List of Acronyms**

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CPMS	Continuous Parameter Monitoring Systems
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
NESHAP	National Emission Standards for Hazardous Air Pollutants
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate matter
PM <sub>10</sub>	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO <sub>2</sub>	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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**Section I: FACILITY INFORMATION**

PERMITTEE: Correll, Incorporated

AFIN: 24-00057

PERMIT NUMBER: 0814-AOP-R2

FACILITY ADDRESS: 300 South Hancock  
Charleston, AR 72933

COUNTY: Franklin County

MAILING ADDRESS: PO Box 417  
Charleston, AR 72933-0417

CONTACT NAME Suzanne Siebenmorgen

CONTACT POSITION: Human Resource Manager

TELEPHONE NUMBER: (479) 965-2247

REVIEWING ENGINEER: Patty Campbell

UTM Zone: 15

UTM North - South (Y): 3906201.88

UTM East - West (X): 405811.68

**Facility: Correll, Incorporated**  
**Permit No.: 0814-AOP-R2**  
**AFIN: 24-00057**

## **Section II: INTRODUCTION**

### **Summary of Permit Activity**

Correll, Incorporated (Correll) (AFIN: 24-00057) owns and operates a metal, office furniture manufacturing facility (NAICS 337214) located at 300 South Hancock in Charleston, Franklin County, Arkansas 72933. Correll requests renewal and modification to its Title V Operating Air Permit. Correll seeks approval to update emission rates due to changes in methodology and conversion to low VOC and low HAP raw material usage. Additionally, one cyclone (SN-13) has been removed from service and sawdust handling (SN-18) has been designated a new source. Permitted annual emission increases and decreases associated with these modifications are: -25.3 tpy PM, -25.8 tpy PM<sub>10</sub>, -11.2 tpy VOC, 1.4 tpy CO, 0.1 tpy NO<sub>x</sub>, -0.5 tpy phosphoric acid, -0.1 tpy molybdic acid, -0.1 tpy copper sulfate, -51.81 tpy xylene, -10.58 tpy ethyl benzene, -2.95 tpy glycol ether, 1.35 tpy cumene, -12.78 tpy naphthalene, -37.0 tpy toluene, -1.2 tpy hexane, and 0.71 tpy acetone. Correll is subject to 40 CFR Part 63, Subpart RRRR – National Emission Standards for Hazardous Air Pollutants (NESHAP): *Surface Coating of Metal Furniture*. Annual emissions are permitted at: 1.6 tpy PM, 1.1 tpy PM<sub>10</sub>, 0.3 tpy SO<sub>2</sub>, 233.7 tpy VOC, 2.0 tpy CO, 2.4 tpy NO<sub>x</sub>, 2.19 tpy Xylene, 0.42 tpy Ethyl benzene, 1.35 tpy Cumene, and 0.71 tpy acetone.

### **Process Description**

Correll, Inc. is a manufacturer of metal folding tables, bookcases, and computer furniture that are sold through retail stores and direct to customers. In the manufacturing process, Correll fabricates metal parts, laminates and cuts particleboard, and assembles these parts into metal furniture.

#### Forming Metal Legs and Aprons – Painting Preparation and Painting

Tubular steel and strip steel are cut to correct lengths, bent to the desired shapes, and punched. These pieces are welded together to form table legs and aprons. The metal table legs and aprons are conveyed to a natural gas-fired, recirculation phosphatizer bath (SN-01) and dried in a natural gas-fired dryer (SN-02) in a pre-painting preparation process. The legs are conveyed to two electrostatic paint booths (SN-03 & 04) for painting. If necessary, the pieces are sprayed in the touch-up paint booth (SN-11A/B). MSDSs provided by the facility show that all paints are designated “low HAP” and the sole paint catalyst is designated “no HAP”. Correll is subject to 40 CFR 63 Subpart RRRR – National Emission Standards for Hazardous Air Pollutants (NESHAP): *Surface Coating of Metal Furniture*, even though its HAP emission levels are below major source thresholds because of the EPA “once-in-always-in” rule. After painting, the parts are dried in a natural gas-fired oven (SN-05) and are taken to assembly.



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### Assembly Table Tops and Shelves

Particleboard is processed by applying a paper laminate (which can be received with a layer of hot glue pre-attached to the backside) using heat and pressure to form the table tops. Tops may have Formica-type high pressure laminate sheets attached by gluing them with water based glue that contains no volatile organic compounds (VOC's) or hazardous air pollutants (HAP's). The lamination process (formerly SN-07) has changed the materials used and is listed as an Insignificant Activity.

After lamination, the particleboards are sawed to the correct size and the edges of the tabletops are routed so a plastic band may be placed around them. Sawdust from the sawing and routing operations (SN-15) is controlled through a baghouse in conjunction with a cyclone. The former cyclone (SN-13), while still at the facility, has been disconnected from the process and is no longer operable. SN-13 has been removed from service. Emissions generated from the sawdust handling and loading process, where a cyclone drops the sawdust into the bin for off-site shipment, are designated SN-18. Any sanding required is completed with small hand-held sanders that are exempt from permitting (B-17). Some pieces for bookcases require holes and these are drilled on two boring machines.

Any final touch-up painting (SN-16) is completed with aerosol cans. Aerosol paint cans are exempt from 40 CFR Part 63 Subpart RRRR – National Emission Standards for Hazardous Air Pollutants (NESHAP): *Surface Coating of Metal Furniture*.

Once the tabletops are completed they are assembled with the lower apron and legs. This completes the manufacturing process and the metal furniture is packed for shipping. Packaging (SN-17) for shipping includes a manual step to reinforce the corners of the packing material through use of hot melt glue, tape, and occasionally a spray adhesive. The spray adhesive, which is used in the Packaging (SN-17), generates non-point VOC, HAP and acetone emissions. Correll uses stencil ink (an Insignificant Activities) to prepare the table's packaging for shipment.

### Maintenance Shop

A small Parts Washer (SN-14) (dip tank) to clean equipment parts from the process is located in the Maintenance Shop. The cleaning solvents used in the Parts Washer are Mineral Spirits and/or straight methyl ethyl ketone (MEK), both of which are 100% VOC.

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**Regulations**

The following table contains the regulations applicable to this permit.

**Table 2 – Regulations**

Source No.	Regulation Citations
Facility-wide	<i>Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999</i>
Facility-wide	<i>Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective October 15, 2007</i>
Facility-wide	<i>Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002</i>
03, 04, 11 A/B	40 CFR Part 63, Subpart RRRR – National Emission Standards for Hazardous Air Pollutants (NESHAP): <i>Surface Coating of Metal Furniture (Appendix A)</i>

A full explanation can be found in a letter dated January 2, 2002 addressed to Ms. Anna Hubbard from GBM & Associates, which conducted the third party independent entity review on November 6, 2001. Correll was issued air permit #814-AR-1 on August 20, 1990 with this statement: “The painting booths were originally installed in the 1970’s and operated essentially unchanged until 1989. In 1989 a fire destroyed the two paint booths (SN-03 and 04). Further examination of this issue revealed that prior to the issuance of Correll’s Title V air permit . . . (i.e. permits 814-AR-1 through 814AR-4) contained the following language. “Correll is not subject to the Standards of Performance for Surface Coating of Metal Furniture as found in NSPS 40 CFR Part 60, Subpart EE, since the fixed capital expense of the painting equipment which was replaced in 1989 is less than 50% of the fixed capital expense of an entirely new metal furniture coating line.” “. . . The installation of the touch-up booth (SN-11) in 1992 consisted of relocating an existing spray gun . . . to the area outside the paint booth. It was determined that this action did not trigger NSPS Subpart EE.” “The increase in maximum paint usage from 4.81 gallons/hr to 9.62 gallons/hr was achieved with no physical modification to the spray booths. After a physical measure of the spraying capacity during the preparation of the Title V permit, a slight increase of maximum hourly paint usage from 9.62 to 9.65 gallons/hr. The determination was made . . . NSPS Subpart EE did not become applicable.”

Correll is a metal furniture manufacturer (NAICS 337214). Correll manufactures only final products: no intermediate components, which are then used in the manufacture of wood products elsewhere, are produced. Correll does not manufacture wood furniture or wood furniture components. Therefore, Correll is not subject to the NESHAP 40 CFR Part 63, Subpart JJ.

Facility: Correll, Incorporated  
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**Emission Summary**

The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

**Table 3 – Emission Summary**

<b>EMISSION SUMMARY</b>					
<b>Source No.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission Rates</b>		<b>Cross Reference Page</b>
			<b>lb/hr</b>	<b>tpy</b>	
Total Allowable Emissions		PM	2.7	1.6	N/A
		PM <sub>10</sub>	1.3	1.1	
		SO <sub>2</sub>	0.3	0.3	
		VOC	102.1	233.7	
		CO	0.6	2.0	
		NO <sub>x</sub>	0.6	2.4	
HAPS*		Xylene	0.95	2.19	N/A
		Ethyl benzene	0.19	0.42	
		Cumene	0.59	1.35	
Air Contaminants**		Acetone	0.36	0.71	N/A
01	Phosphate Washer (Paint Preparation Bath) (natural gas, 2.86 MMBtu/hr)	PM	0.1	0.1	12
		PM <sub>10</sub>	0.1	0.1	
		SO <sub>2</sub>	0.1	0.1	
		VOC	0.1	0.1	
		CO	0.3	1.1	
		NO <sub>x</sub>	0.3	1.3	
02	Drying Oven (Paint Preparation Dryer) (natural gas, 0.82 MMBtu/hr)	PM	0.1	0.1	12
		PM <sub>10</sub>	0.1	0.1	
		SO <sub>2</sub>	0.1	0.1	
		VOC	0.1	0.1	
		CO	0.1	0.3	
		NO <sub>x</sub>	0.1	0.4	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
05	Paint Bake Oven (natural gas, 1.53 MMBtu/hr)	PM PM <sub>10</sub> SO <sub>2</sub> VOC CO NO <sub>x</sub>	0.1 0.1 0.1 0.1 0.2 0.2	0.1 0.1 0.1 0.1 0.6 0.7	12
03, 04, 11 A/B	Electrostatic (SN-03 & 04) and Touch-up (SN-11A/B) Paint Booths	VOC Xylene Ethyl benzene Cumene	100.4 0.93 0.18 0.59	230.7 2.14 0.41 1.35	14
07	Cement Lamination	See Insignificant Activities List			31
08, 09, 10, 12, & 13	Removed from Service				n/a
14	Parts Washer	VOC Xylene	0.3 0.01	0.5 0.01	16
15	Sawing and Routing (w/baghouse & cyclone)	PM PM <sub>10</sub>	0.1 0.1	0.4 0.4	17
16	Touchup Painting	VOC Xylene Ethyl benzene Acetone	0.5 0.01 0.01 0.16	2.1 0.04 0.01 0.70	18
17	Packaging	VOC Acetone	0.6 0.20	0.1 0.01	19
18	Sawdust Handling	PM PM <sub>10</sub>	2.3 0.9	0.9 0.4	20

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

\*\*Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

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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 was issued October 27, 1997 as the first Title V operating air permit. 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.

Air Permit #0814-AOP-R1 was issued on February 7, 2003 as both a renewal and modification. Emissions from the small Parts Washer (SN-14) changed due to use of a different solvent. Touch-up painting (SN-16) with spray cans was added as a source. Two cyclones (SN-09 & SN-10) were removed and replaced with a bag filter (SN-15). New emission summary tables were submitted for SN-03, 04, and 11 due to updated paint MSDSs. Annual emissions were permitted at: 26.9 tpy PM/PM<sub>10</sub>, 0.3 tpy SO<sub>2</sub>, 244.9 tpy VOC, 0.6 tpy CO, 2.3 tpy NO<sub>x</sub>, 05 tpy Phosphoric Acid, 0.1 tpy Molybdcic Acid, 0.1 tpy Copper Sulfate, 54.0 tpy Xylene, 37.0 tpy Toulene, 11.0 tpy Ethyl benzene, 1.2 tpy Hexane, 12.78 tpy Napthalene, and 2.95 tpy Glycol Ether.

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**Section IV: SPECIFIC CONDITIONS**

**Phosphate Washer & Drying Oven (SN-01 & 02) and Paint Bake Oven (SN-05)**

**Source Description**

In preparation for painting, metal tubing and strip steel pieces (furniture legs and aprons) are cleaned in a heated, caustic recirculation, phosphatizer bath, the Phosphate Washer (SN-01). The cleaning agents and/or other bath components added to the water bath do not contain any volatile organic compounds (VOCs) or hazardous air pollutants (HAPs). The wet metal parts washed in the Phosphate Washer are dried in a natural gas-fired Drying Oven (SN-02). Later, after the painting process is complete, the painted metal parts are dried in a natural gas-fired Paint Bake Oven (SN-05).

**Specific Conditions**

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #4 and #5. [Regulation No. 19 §19.501 *et seq.* effective October 15, 2007 and 40 CFR Part 52, Subpart E]

**Table 4 – SN-01, 02 & 05 Maximum Criteria Emission Rates**

Source No.	Description	Pollutant	lb/hr	tpy
01	Phosphate Washer (Paint Preparation Bath) (natural gas, 2.86 MMBtu/hr)	PM <sub>10</sub>	0.1	0.1
		SO <sub>2</sub>	0.1	0.1
		VOC	0.1	0.1
		CO	0.3	1.1
		NO <sub>x</sub>	0.3	1.3
02	Drying Oven (Paint Preparation Dryer) (natural gas, 0.82 MMBtu/hr)	PM <sub>10</sub>	0.1	0.1
		SO <sub>2</sub>	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.3
		NO <sub>x</sub>	0.1	0.4
05	Paint Bake Oven (natural gas, 1.53 MMBtu/hr)	PM <sub>10</sub>	0.1	0.1
		SO <sub>2</sub>	0.1	0.1
		VOC	0.1	0.1
		CO	0.2	0.6
		NO <sub>x</sub>	0.2	0.7

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2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #4 and #5. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 5 – SN-01, 02 & 05 Maximum Non-Criteria Emission Rates**

Source No.	Description	Pollutant	lb/hr	tpy
01	Phosphate Washer (Paint Preparation Bath) (natural gas, 2.86 MMBtu/hr)	PM	0.1	0.1
02	Drying Oven (Paint Preparation Dryer) (natural gas, 0.82 MMBtu/hr)	PM	0.1	0.1
05	Paint Bake Oven (natural gas, 1.53 MMBtu/hr)	PM	0.1	0.1

3. Visible emissions may not exceed 5% opacity as measured by EPA Reference Method #9 for SN-01, 02, and 05. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
4. The permittee shall use only pipeline quality natural gas as fuel for the Phosphate Washer (SN-01), the Drying Oven (SN-02) and the Paint Bake Oven (SN-05). Emissions from SN-01, 02 and 05 have been calculated at full load for continuous operation and no calculated recordkeeping of natural gas usage is required. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee shall maintain the Material Safety Data Sheets (MSDS) or equivalent documentation on-site for each cleaning agent and/or other bath component used in the Phosphate Washer (SN-01) to demonstrate that the water bath does not contain any volatile organic compounds (VOCs) or hazardous air pollutants (HAPs). The MSDSs shall be provided to the Department upon request. No other recordkeeping of the bath components is required. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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### Electrostatic (SN-03 & SN-04) and Touch-up (SN-11A/B) Paint Booths

#### Source Description

A variety of paint is used in the three (3) paint booths. All paint is low-HAP formulation in order to comply with 40 CFR Part 63, Subpart RRRR: *Surface Coating of Metal Furniture*. The painting takes place in two (2) Electrostatic (SN-03 & 04) and one (1) Touch-up (SN-11A/B) Paint Booths. MSDSs provided by the facility indicated that all paints used are designated “low HAP” and the sole paint catalyst is designated “no HAP”. The catalyst is an additive that aids the paint in drying quickly, especially in winter. The catalyst usage (about 20 gallons per year) is included in the annual paint usage. The Electrostatic Paint Booths (SN-03 & 04) were originally installed in the 1970’s but replaced after a fire in 1989. The Touch-up Paint Booth with two stacks (SN-11A/B) is used to recoat parts which did not receive sufficient paint in the initial paint process. Dry filters control particulate overspray, not VOC emissions. Solvent is used in the paint booths as a thinner and for clean-up of equipment within the booths.

#### Specific Conditions

6. The permittee shall not exceed the emission rates set forth in the following table. Emissions for the paint booths are based on maximum hourly application rate of 9.65 gal/hr. The maximum rate was determined in a physical test prior to 1997, which measured the true maximum spraying capacity and established permitted throughput limits. The permittee will demonstrate compliance with annual emissions of this condition by compliance with Plantwide Conditions #7 and #9. [Regulation No. 19 §19.501 and 40 CFR Part 52, Subpart E]

**Table 6 – SN-03, SN-04 & SN-11A/B Maximum Criteria Emission Rates**

Pollutant	lb/hr	tpy
VOC (PM Filters, each booth)	100.4	230.7

7. The permittee shall not exceed the emission rates set forth in the following table. Emissions for the paint booths are based on maximum hourly application rate of 9.65 gal/hr. The maximum rate was determined in a physical test prior to 1997, which measured the true maximum spraying capacity and established permitted throughput limits. The permittee shall demonstrate compliance with annual emissions of this condition by compliance with Plantwide Conditions #8 and #9. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]



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**Table 7 – SN-03, SN-04 & SN-11A/B Maximum Non-Criteria Emission Rates**

<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
Xylene	0.93	2.14
Ethyl benzene	0.18	0.41
Cumene	0.59	1.35

8. Visible emissions may not exceed 10% opacity limit as measured by EPA Reference Method 9 for SN-03, 04, and 11A/B. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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### Parts Washer (SN-14)

#### Source Description

A small Parts Washer (SN-14) (dip tank) to clean equipment parts from the process is located in the Maintenance Shop. The cleaning solvents used in the Parts Washer are Mineral Spirits and/or straight Methyl Ethyl Ketone (MEK), both 100% VOC.

#### Specific Conditions

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Conditions #7 and #9. [Regulation No. 19 §19.501 and 40 CFR Part 52, Subpart E]

**Table 8 – SN-14 Maximum Criteria Emission Rates**

Pollutant	lb/hr	tpy
VOC	0.3	0.5

10. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Conditions #8 and #9. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 9 – SN-14 Maximum Non-Criteria Emission Rates**

Pollutant	lb/hr	tpy
Xylene	0.01	0.01

11. Visible emissions may not exceed 5% opacity limit as measured by EPA Reference Method 9 for the Parts Washer (SN-14). [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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### Sawing and Routing (SN-15)

#### Source Description

Sawdust from sawing the particleboards and routing the edges (SN-15) for assembly of the banding edge is controlled through a baghouse in conjunction with a cyclone.

#### Specific Conditions

12. The permittee shall not exceed the emission rates set forth in the following table. [Regulation No. 19 §19.501 and 40 CFR Part 52, Subpart E]

**Table 10 – SN-15 Maximum Criteria Emission Rates**

<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
PM <sub>10</sub>	0.1	0.4

13. The permittee shall not exceed the emission rates set forth in the following table. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 11 – SN-15 Maximum Non-Criteria Emission Rates**

<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
PM	0.1	0.4

14. Visible emissions may not exceed 5% opacity limit as measured by EPA Reference Method 9 for Sawdust and Routing (SN-15). [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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### Touchup Painting (SN-16)

#### Source Description

Touchup Painting (SN-16) is used to recoat parts that have a visible blemish prior to proceeding to assembly. All paint used is contained in aerosol cans, 12 ounce size. The facility has an adapter to drain any remaining material from the can into the waste paint can for appropriate disposal. All emissions are accounted for in Specific Conditions #12 and #13. After the cans are purged, the empties are thrown in the trash. Aerosol paint cans are exempt from 40 CFR Part 63, Subpart RRRR – National Emission Standards for Hazardous Air Pollutants (NESHAP): *Surface Coating of Metal Furniture*.

#### Specific Conditions

15. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Conditions #7 and #9. [Regulation No. 19 §19.501 and 40 CFR Part 52, Subpart E]

**Table 12 – SN-16 Maximum Criteria Emission Rates**

Pollutant	lb/hr	tpy
VOC	0.5	2.1

16. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Conditions #8 and #9. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 13 – SN-16 Maximum Non-Criteria Emission Rates**

Pollutant	lb/hr	tpy
Xylene	0.01	0.04
Ethyl benzene	0.01	0.01
Acetone	0.16	0.70

17. Visible emissions may not exceed 5% opacity limit as measured by EPA Reference Method 9 for touchup painting (SN-16). [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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### Packaging (SN-17)

#### Source Description

The Packaging (SN-17) process includes a manual step to reinforce the corners of the packaging through use of hot melt glue, tape, and a spray adhesive. The Aerosol Spray Adhesive generates non-point VOC and HAP emissions.

#### Specific Conditions

18. The permittee shall not exceed the emission rates set forth in the following table. The maximum hourly emission rate is based on one can per hour. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Conditions #7 and #9. [Regulation No. 19 §19.501 and 40 CFR Part 52, Subpart E]

**Table 14 – SN-17 Maximum Criteria Emission Rates**

Pollutant	lb/hr	tpy
VOC	0.6	0.1

19. The permittee shall not exceed the emission rates set forth in the following table. The maximum hourly emission rate is based on one can per hour. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Conditions #8 and #9. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 15 – SN-17 Maximum Non-Criteria Emission Rates**

Pollutant	lb/hr	tpy
Acetone	0.20	0.01

20. The permittee shall not exceed 144 cans (12 ounces/can) of aerosol spray adhesive (SN-17) per any consecutive twelve month period. [Regulation No. 19 §19.501 and 40 CFR Part 52, Subpart E]
21. The permittee shall maintain records of aerosol spray adhesive which demonstrate compliance with Specific Condition #20. The permittee shall maintain a twelve month rolling total and each individual month's data on-site and made available to Department personnel upon request. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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### Sawdust Handling (SN-18)

#### Source Description

Sawdust Handling (SN-18) is non-point emissions of PM and PM<sub>10</sub> estimated for the sawdust handling and loading for shipment off-site.

#### Specific Conditions

22. The permittee shall not exceed the emission rates set forth in the following table. [Regulation No. 19 §19.501 and 40 CFR Part 52, Subpart E]

**Table 16 – SN-18 Maximum Criteria Emission Rates**

Pollutant	lb/hr	tpy
PM <sub>10</sub>	0.9	0.4

23. The permittee shall not exceed the emission rates set forth in the following table. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 17 – SN-18 Maximum Non-Criteria Emission Rates**

Pollutant	lb/hr	tpy
PM	2.3	0.9

24. Visible emissions may not exceed 20% opacity limit as measured by EPA Reference Method 9 for Sawdust Handling (SN-18). [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

Correll, Incorporated shall continue to operate in compliance with those identified regulatory provisions. The facility shall 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: PLANT WIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No.19 §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No.19 §19.702 and/or Regulation No.18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation No.19 §19.702 and/or Regulation No.18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms; and
  - d. Utilities for sampling and testing equipment.
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation No.19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]



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7. The permittee shall not exceed the material throughput (in gallons) and VOC content limits (in pounds/gallon) at the facility per consecutive 12-month period set forth in the following table. [§19.705 of Regulation No. 19 and/or §18.1004 of regulation No. 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 18 – Throughput and VOC Content Limits**

SN(s)	Materials	Annual Throughput Limit (gallons/consecutive 12 months)	Maximum Allowable VOC Content Limit (lb/gallon)
03, 04, 11A/B	Enamel Paints (low HAPs) & Catalyst (no HAPs)	44,237	4.94
03, 04, 11A/B	Solvents	33,126	7.33
14	Solvents	110	7.33
16	Aerosol Spray Paints	912.4	6.576
17	Aerosol Spray Adhesives (144, 12 oz cans @ 7.1 lb/gal)	144, 12 oz cans = 15.22 gal/yr	5.191

8. The permittee shall not exceed the reportable HAP and acetone content limits (in pounds/gallon) at the facility. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 19 – HAP and Acetone Content Limits**

SN(s)	Material	Pollutant	HAP & Acetone Content Limits (lb/gal)
03, 04, 11A/B	Enamel Paints	Xylene	0.097
		Ethyl benzene	0.019
		Cumene	0.061
14	Solvents	Xylene	0.15

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SN(s)	Material	Pollutant	HAP & Acetone Content Limits (lb/gal)
16	Aerosol Spray Paints	Xylene	0.077
		Ethyl benzene	0.016
		Acetone	1.528
17	Aerosol Spray Adhesives	Acetone	1.92

9. The permittee shall maintain monthly records which demonstrate compliance with Plantwide Conditions #7 and #8. These records shall list chemicals by name and product number. The permittee shall maintain the Material Safety Data Sheets (MSDS) or equivalent documentation on-site. These records shall indicate the usage quantity and content in gallons of each enamel paint, spray paint, catalyst, adhesive, cleaning solvent, and mineral spirits used; their respective VOC, reportable HAPs and/or acetone content (lbs/gal); and the resulting emissions from the usage of each gallon of material (lbs/month) used at the facility. The permittee shall maintain a twelve month rolling total and each individual month's data on-site; maintained in a spreadsheet, database, or other well-organized format; made available to Department personnel upon request; and submitted to the Department in accordance with General Provision #7. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. [§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 allow no open burning of any material at this facility. There shall not be any disposal of VOC containing scrap and/or waste by evaporation or incineration. All scrap paints and solvents are classified as hazardous waste. [Regulation #23, effective March 21, 2005, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**NESHAP Requirements**

11. The permittee is subject to and shall comply with 40 CFR Part 63, Subpart RRRR – National Emission Standards for Hazardous Air Pollution: *Surface Coating of Metal Furniture*. [§19.304 of Regulation No. 19, 40 CFR §60.752 and 40 CFR §63.4881]
12. The permittee must limit organic HAP emissions to the atmosphere to no more than 0.10 kg organic HAP per liter (0.83 lb/gal) of coating solids used during each compliance period, determined according to the procedures in §63.4941, §63.4951, or §63.4961. [§19.304 of Regulation No. 19 and §63.4890(c)]

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13. The permittee must include all coatings, thinners, and cleaning materials used in SN-03, SN-04, and SN-11A/B when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.4890. To make this determination, the permittee must demonstrate that the organic HAP content of each coating used in the coating operation or group of coating operations is less than or equal to the applicable emission rate limit in §63.4890 and that each thinner and each cleaning material used contains no organic HAP. The permittee must meet all the requirements of §§63.4940, 63.4941, and 63.4942 to demonstrate compliance with the emission limit using the compliant material option. [§19.304 of Regulation No. 19 and §63.489(a)]
14. The permittee must comply with the general requirements of §63.4900 for the affected sources, paint booths SN-03, 04, and 11A/B, as follows: [§19.304 of Regulation No. 19 and §63.4900(a-b)]
  - a. Must be in compliance at all times with the emission limitations specified in §63.4890 and
  - b. Must always operate and be maintained according to the provisions in §63.6(e)(1)(i), including all air pollution control and monitoring equipment, if any, used for purposes of complying with §63.4900.
15. The permittee shall comply with all General Provisions as referenced in Table 2 of §§63.1 through 63.15 which apply to SN-03, 04, and 11A/B. [§19.304 of Regulation No. 19 and §63.4901]
16. The permittee must submit the following notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e), (h), and (j) that apply by the dates specified in those sections, except as provided in §63.4910(b-c) below:
  - a. The Initial Notification shall be submitted no later than 1 year after May 23, 2003.
  - b. The Notification of Compliance Status required by §63.9(h) shall be submitted no later than 30 calendar days following the end of the initial compliance period described in §63.4940, §63.4950, or §63.4960 that applies to SN-03, 04, and 11A/B.
  - c. The Notification of Compliance Status must contain the information specified in §63.4910 (c)(1) through (9) and the applicable information specified in §63.9(h).
17. The permittee must submit semiannual compliance reports for SN-03, SN-04, and SN-11A/B according to the requirements of §63.4920(a)(1) through (5) listed below. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), such as those detailed in §63.4920(a)(2) and must be submitted to the Department in accordance with General Provision #7:

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- a. Unless the Director has approved a different schedule for submission of reports under §63.10(a), the permittee must prepare and submit each semiannual compliance report according to the dates specified in §63.4920(a)(1)(i) through (iv).
  - b. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in §63.4920 in the 6-month monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to §63.4920 along with, or as part of, the 6-month monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all information required by the part 70 or part 71 6-month monitoring report concerning deviations from the requirements of §63.4920 as defined in §63.4981, the submission of the semiannual compliance report shall be deemed to satisfy any obligation to report the same deviation information in the part 70 or part 71 6-month monitoring report. However, in such situations, the 6-month monitoring report must cross-reference the semiannual compliance report, and submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
  - c. The semiannual compliance report must contain the information specified in §63.4920(a)(3)(i) through (v), and the information specified in §63.4920(a)(4) through (7) and (c)(1) that is applicable to SN-03, SN-04, and SN-11A/B.
  - d. If there were no deviations from the emission limits, operating limits, and work practice standards in §§63.4890, 63.4892, and 63.4893, respectively, that apply to the permittee, the semiannual compliance report must include an affirmative statement that there were no deviations from the emission limitations, operating limits, or work practice standards in §§63.4890, 63.4892, and 63.4893 during the reporting period. If there were no deviations from the emission limitations in §63.4890, the semiannual compliance report must include the affirmative statement that is described in either §63.4942(c), §63.4952(c), or §63.4962(f), as applicable.
  - e. If the permittee used the compliant material option, and there was a deviation from the applicable emission limit in §63.4890, the semiannual compliance report must contain the information in paragraphs §63.4920(a)(5)(i) through (iv).
18. The permittee must collect and keep records of the data and information specified in §63.4930 as listed below. Failure to collect and keep these records is a deviation from the applicable standard.

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- a. A copy of each notification and report submitted to comply with §63.4930, and the documentation supporting each notification and report.
  - b. A current copy of information provided by materials suppliers or manufacturers. This would include information such as manufacturer's formulation data for the materials used, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material and the volume fraction of coating solids for each coating. If testing was conducted to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If information provided to the permittee by the manufacturer or supplier of the material that was based on testing was used, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
  - c. For each compliance period, the records specified in §63.4930(c)(1) through (4).
  - d. A record of the name and volume of each coating, thinner, and cleaning material used during each compliance period.
  - e. A record of the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each compliance period.
  - f. A record of the volume fraction of coating solids for each coating used during each compliance period.
  - g. If a determination of density is required by the compliance option used to demonstrate compliance with the emission limit, a record of the density for each coating used during each compliance period; and, if either the emission rate without add-on controls or the emission rate with add-on controls compliance option was used, the density for each thinner and cleaning material used during each compliance period.
  - h. If the permittee used an allowance in Equation 1 of §63.4951 for organic HAP contained in waste materials sent to or designated for shipment to a TSD according to §63.4951(e)(4), the permittee must keep records of the information specified in §63.4930(h)(1) through (3).
  - i. The permittee must keep records of the date, time, and duration of each deviation.
19. The permittee shall meet the recordkeeping requirements of §63.4931(a) through (c) as specified below:

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- a. The records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
  - b. As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
  - c. The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You may keep these records off-site for the remaining 3 years. Records must be kept on-site pertaining to the design and manufacturer's specifications for operation of add-on control equipment for the life of the equipment. [§19.304 of Regulation No. 19 and §63.4931(a-c)]
20. The permittee shall meet the compliance requirements as specified in §63.4940 through §63.4942. [§19.304 of Regulation No. 19 and §63.4940 through §63.4942]

#### **Title VI Provisions**

21. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
- a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
22. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

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- 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.
23. 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.
24. 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.
25. The permittee can switch from any ozone-depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

### **Permit Shield**

26. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in Table 18 - Applicable Regulations of this condition.

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- a. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated August 7, 2007.

**Table 20 – Applicable Regulations**

Source No.	Regulation	Description
Facility	Regulation 19	Regulation of the Arkansas Plan of Implementation for Air Control, effective October 15, 2007
Facility	Regulation 26	Regulations of the Arkansas Air Operating Air Permit Program, effective September 26, 2002
03, 04, & 11A/B	40 CFR Part 63, Subpart RRRR	NESHAP: Surface Coating of Metal Furniture

- b. The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated August 7, 2007.

**Table 21 – Inapplicable Regulations**

Source No.	Regulation	Description
Facility	40 CFR 52.21	Prevention of Significant Deterioration (PSD) of Air Quality
03 & 04, & 11A/B	40 CFR Part 60, Subpart EE	NSPS: Metal Furniture Surface Coating
Facility	40 CFR Part 63.80, Subpart JJ	NESHAP: National Emission Standards for Wood Furniture Manufacturing Operations



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### **Section VII: INSIGNIFICANT ACTIVITIES**

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in applications dated August 7, 2007, August 17, 2007, October 23, 2007, and November 21, 2007

**Table 22 – Insignificant Activities**

<b>Description</b>	<b>Category</b>
Welding Operations	A-7
Diesel Fire Water Pump	A-13
Heat & Pressure Lamination of Pre-Glued laminates (formerly SN-07)	A-13
Stencil Ink (Labeling of Packaging Materials)	A-13

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, 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. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective September 26, 2002]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department shall not necessarily notify the permittee when the permit renewal application is due. [Regulation No. 26 §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;

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- e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26 §26.2 must certify all required reports. The permittee shall send the reports to the address below: [40 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]
- Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
5301 Northshore Drive  
North Little Rock, AR 72118
8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
- a. For all upset conditions (as defined in Regulation 19.601), the permittee shall make an initial report 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:
    - i. The facility name and location,
    - ii. The process unit or emission source deviating from the permit limit,
    - iii. The permit limit, including the identification of pollutants, from which deviation occurs,
    - iv. The date and time the deviation started,
    - v. The duration of the deviation,

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- vi. The average emissions during the deviation,
- vii. The probable cause of such deviations,
- viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
- ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report shall serve as both the initial report and full report.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a. above. The semi-annual report must include all the information as required in the initial and full report required in 8a. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]
- 9. 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. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]
  - 10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]
  - 11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]

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12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]
14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]

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20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]
  - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
  
21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The compliance status;
  - c. Whether compliance was continuous or intermittent;
  - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; 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. Nothing in this permit shall alter or affect the following: [Regulation No. 26 §26.704(C)]
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;

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- b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
  - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**APPENDIX A**

40 CFR Part 63, Subpart RRRR – NESHAP: *Surface Coating of Metal Furniture*



**CERTIFICATE OF SERVICE**

I, Cynthia Hook, hereby certify that a copy of this permit has been mailed by first class mail to Correll, Incorporated, PO Box 417, Charleston, AR, 72933-0417, on 3/5/08.

A handwritten signature in black ink, appearing to read 'C Hook', written over a horizontal line.

Cynthia Hook, AAI, Air Division

