

## RESPONSE TO COMMENTS

**Ranger Boats/Wood Manufacturing Company, Inc.**  
**P.O. Box 179**  
**Flippin, AR 72634**  
**Marion County**  
**AFIN: 45-00008**

On August 22, 2003, the draft permit for the above referenced facility was issued. During the comment period, the facility submitted comments. The Department gives the following responses to these comments:

**Comment 1:** Specific Condition 2: This condition has placed a single hourly limit for both styrene and MMA. Ranger requests that the pounds per hour limit be listed for styrene and MMA individually (i.e. for SN-01, 11.33 lb/hr and 11.33 lb/hr MMA). Ranger currently uses gel coats that have styrene contents at the maximum limit, and also a small percentage of MMA. These would likely exceed the draft emission limit in Specific Condition 2.

**Response 1:** Specific Condition 2 has been changed to allow Ranger to substitute MMA for Styrene. For example, at SN-01, the limits are 11.33 lb/hr Styrene\* and 0.33 lb/hr MMA. The footnote in the table reads as follows: “\*MMA may be substituted for Styrene for listed sources.” The table reads now as it did in Permit 979-AOP-R2. The Department is confident that human health and the environment will be protected with the emission limits set in the permit. Emissions beyond the 0.33 lb/hr MMA limit must, however, be accompanied by an equivalent reduction in Styrene. In order for the permit to allow higher emission rates, the Department would require more detailed information from the facility.

**Comment 2:** Specific Condition 8: A Maximum Daily Use limit for gel coats, resins and styrene solvents has been added. These materials are used in a dozen different buildings, and used from supplies ranging from small containers to bulk tanks with recirculating lines. It would be virtually impossible to maintain meaningful records of usage on a daily basis. This has historically been recognized, which is what led to a maximum limit of boat production per day. It is absolutely critical that the daily usage limit be removed from Specific Condition 8, and the related record keeping requirement in Specific Condition 12.

**Response 2:** The Department agrees the daily limit and record keeping requirement pertaining to the usage of gel coats, styrene solvents, and resins may be removed from Specific Conditions 8 and 12 without compromising the effectiveness of the permit. A daily short term through put limit on the amount of boats processed is present to ensure compliance with the hourly emission rates.

**Comment 3:** Specific Condition 12: This requires records to be updated by the fifteenth of the month following the month to which the records pertain. Due to the complex operations, Ranger Boats has always struggled to receive the necessary information from the various operations and

purchasing personnel within that time frame. Ranger Boats requests that the condition be revised to allow until the end of the month following the month to which the records pertain.

**Response 3:** Specific Condition 12 has been changed to allow the facility until the end of the month following the month to which the records pertain to update monthly records.

**Comment 4:** Specific Condition 12 and Plantwide Condition 15: These conditions add a requirement to submit semi-annual reports per General Provision 7. This has not been required in any of the previous Title V permits for Ranger Boats. Ranger requests that this requirement be deleted from Specific Condition 12 and Plantwide Condition 15.

**Response 4:** The requirement will not be removed of Specific Condition 12 or Plantwide Condition 15. The Department is the process of updating all Title V permits, as they come in for modifications and/or renewals, to clarify that production throughput, fuel limits, annual VOC limits and other process limiting record keeping be submitted in accordance with General Provision 7. Semi-annual submission of these records has always been required by Regulation 26.

# OPERATING AIR PERMIT

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

Permit #: 0979-AOP-R3

IS ISSUED TO:

Ranger Boats/Wood Manufacturing Company, Inc.  
Highway 178 North  
Flippin, AR 72634  
Marion County  
AFIN: 45-00008

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:

1 June 1999 and 31 May 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Keith A. Michaels

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Date Modified

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**SECTION I: FACILITY INFORMATION**

PERMITTEE: Ranger Boats/Wood Manufacturing Company, Inc.

AFIN: 45-00008

PERMIT NUMBER: 0979-AOP-R3

FACILITY ADDRESS: Highway 178 North  
Flippin, AR 72634

COUNTY: Marion

CONTACT POSITION: Kenneth Howard

TELEPHONE NUMBER: (870) 453-2222

REVIEWING ENGINEER: Amanda Holloway

UTM North-South (X): Zone 15 4016.1  
East-West (Y): 535.9

**Ranger Boats/Wood Manufacturing Company, Inc.**  
**Permit #: 0979-AOP-R3**  
**AFIN: 45-00008**

## **SECTION II: INTRODUCTION**

### **Summary of Permit Activity**

Ranger Boat Company manufactures fiberglass boats, boat trailers, and a small line of fiberglass products for the boat industry. The boat and fiberglass product manufacturing process utilizes a laminating technique involving various coatings. The major components of the laminations are styrene based resins and gel coat.

With this permit modification, the monthly usage limits for the gel coats, resins, and styrene solvents will be changed from the ratio limit of usage per 100,000 sqft of boat painted to a maximum monthly usage limit. Overall, the annual emissions will not change with this permit modification. Also semiannual reporting requirements were added for some record keeping of plantwide throughput, material usage, and emission limits in order to bring the permit up-to-date with the Department's policies on Title V reporting practices.

### **Process Description**

The boat manufacturing process begins with the preparation of a mold. Molds are manufactured in the Tooling Building. Sawdust collected from the manufacture and repair of molds is exhausted through dust collectors (SN-40). The completed molds are then lined with a thick gel coat material (SN-46 and SN-47).

The boat units consist of the outer shell (the hull) and the interior frame (the rail). When the two pieces are assembled, a cavity remains between them which is filled with foam for flotation. Foaming operations create no air emissions except those from cleaning (SN-55). The first step in manufacturing these two pieces is to apply a styrene based paint (referred to as a gel coat) to the inside of the mold. This occurs at the New Plant Building (SN-01 through SN-04 and SN-13 through SN-16). These pieces are then built up by laminating layers of fiberglass and resins (SN-05 through SN-12). When hardened, the boat is pulled out of the mold.

Other laminating operations include the manufacture of boat trailer fenders and miscellaneous other small parts at the Fenders and CCBM Building (SN-26 through SN-39); the Tooling Building (SN-46 and SN-47) and the Small Parts Building (SN-49 through SN-52). Boat repair operations, including laminating activities, occur at the New Boat Repair Building (SN-63 through SN-70), the Old Boat Repair Building (SN-59), and at the building referred to as Claudie's repair (SN-59B).

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Dust from sanding is collected and exhausted through dust collectors throughout the plant (SN-17, SN-23, SN-24, SN-48, SN-48A, and SN-75). Boat seats and interior components manufacturing include adhesive applications (SN-53 and SN-54), and wood fabrication (SN-41).

Dust from sandblasting boat trailers and components is collected in two baghouses (SN-25 and SN-62). The prepared trailers are coated in paint booths at the Trailer Shop (SN-21 and SN-22), at the Truck Shop (SN-73 and SN-74), or at the Trailer Repair Department (SN-71 and SN-72).

Six acetone storage tanks are maintained on site. These include three 450 gallon waste acetone tanks (SN-19, SN-20, and SN-45), one 450 gallon recovered acetone tank (SN-44), one 10,000 gallon virgin acetone tank (SN-18), and one 3,500 gallon virgin acetone tank (SN-43). A still is used for the recovery of waste acetone (SN-42).

### **Regulations**

This facility is subject to the following regulations:

Regulation 18, Arkansas Air Pollution Control Code.

Regulation 19, Regulations of The Arkansas Plan of Implementation for Air Pollution Control.

Regulation 26, Regulations of The Arkansas Operating Air Permit Program.

Regulation 40 CFR 63: Ranger Boats/ Wood Manufacturing Company, Inc. is subject to Subpart VVVV that was promulgated on August 22, 2001.

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<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	27.9	16.1	
		PM <sub>10</sub>	27.9	16.1	
		VOC	423.1	246.5	
		Acetone*	320.6	192.8	
	Note: For each source the HAPs are not listed but must conform to the TLV Table; exceptions are MMA and Styrene for which Specific Conditions limit the emissions.	Ethylene- Glycol (112-07-2)	1.1	0.5	
		MMA**(80-62-6)	6.3	5.6	
		Styrene (100-42-5)	226.9	163.8	
		Propylene Glycol (107-98-2)	3.5	2.0	
		Monomethyl Ether			
		Diethylene Glycol (111-77-3)	3.5	2.0	
		Monomethyl Ether			
		Single HAP	NA	169.6	
		Combined HAPs	NA	330.6	
01		Roof Vent for Four Gelcoat Work-up Booths	VOC	12.4	PWL
		MMA	0.4		
		Styrene	11.4		
02	Roof Vent for Four Gelcoat Work-up Booths	VOC	12.4		
		MMA	0.4		
		Styrene	11.4		
03	Roof Vent for Four Gelcoat Work-up Booths	VOC	12.4		
		MMA	0.4		
		Styrene	11.4		
04	Roof Vent for Four Gelcoat Work-up Booths	VOC	12.4		
		MMA	0.4		
		Styrene	11.4		



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Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
05	Roof Vent for Fiberglass Chop Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
06	Roof Vent for Fiberglass Chop Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
07	Roof Vent for Fiberglass Chop Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
08	Roof Vent for Fiberglass Chop Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
09	Roof Vent for Fiberglass Chop Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
10	Roof Vent for Fiberglass Chop Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
11	Roof Vent for Fiberglass Chop Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
12	Roof Vent for Fiberglass Chop Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
13	Roof Vent for Gelcoat Work-up Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		

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Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
14	Roof Vent for Gelcoat Work-up Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
15	Roof Vent for Gelcoat Work-up Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
16	Roof Vent for Gelcoat Work-up Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
16a	Roof Vent for Gelcoat Work-up Booth	VOC	12.4	PWL	20
		MMA	0.4		
		Styrene	11.4		
17	Dust Collector for Grinding and Sanding	PM	0.2	PWL	37
		PM <sub>10</sub>	0.2		
18	Tank Vent - Virgin Acetone	Acetone	38.2	PWL	32
19	Tank Vent - Waste Acetone	Acetone	1.6	PWL	32
20	Tank Vent - Waste Acetone	Acetone	1.6	PWL	32
21	Roof Vent - Paint Spray Booth	VOC	64.1	PWL	32
		Diethylene Glycol	1.7		
		Propylene Glycol	1.7		
22	Roof Vent - Paint Spray Booth	VOC	64.1	PWL	32
		Diethylene Glycol	1.7		
		Propylene Glycol	1.7		
23	Dust Collector/ Buffing/Grinding	PM	0.2	PWL	37
		PM <sub>10</sub>	0.2		

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Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
24	Dust Collector/ Grinding and Sanding	PM	2.3		
		PM <sub>10</sub>	2.3		
25	Dust Collector for Sand Blasting	PM	4.6		
		PM <sub>10</sub>	4.6		
26	Roof Vent/ Fiberglassing Chop	VOC	12.4		20
		MMA	0.1		
		Styrene	2.6		
26a	Roof Vent/ Fiberglassing Chop	VOC	12.4		
		MMA	0.1		
		Styrene	2.6		
26b	Roof Vent/ Fiberglassing Chop	VOC	12.4		
		MMA	0.1		
		Styrene	2.6		
27	Roof Vent/Gelcoat	VOC	12.4		
		MMA	0.1		
		Styrene	2.6		
27a	Roof Vent/Gelcoat	VOC	12.4		
		MMA	0.1		
		Styrene	2.6		
28	Roof Vent/ Fiberglassing Chop	VOC	12.4		
		MMA	0.1		
		Styrene	2.6		
29	Roof Vent/ Fiberglassing Chop	VOC	12.4		
		MMA	0.1		
		Styrene	2.6		
30	Roof Vent/Gelcoat	VOC	12.4	PWL	20
		MMA	0.1		
		Styrene	2.6		

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Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
31	Roof Vent/Gelcoat	VOC	12.4		
		MMA	0.1		
		Styrene	2.6		
32	Wall Vent - RTM Area	VOC	0.3		
		MMA	0.1		
		Styrene	0.3		
33	Wall Vent - RTM Area	VOC	0.3		
		MMA	0.1		
		Styrene	0.3		
34	Wall Vent - RTM Area	VOC	0.3		
		MMA	0.1		
		Styrene	0.3		
35	Wall Vent - RTM Area	VOC	0.3		
		MMA	0.1		
		Styrene	0.2		
36p	Wall Vent - RTM Area	PM	1.0		37
		PM <sub>10</sub>	1.0		
36	Wall Vent - RTM Area	VOC	0.3		20
		MMA	0.1		
		Styrene	0.3		
37p	Wall Vent - RTM Area	PM	1.0		37
		PM <sub>10</sub>	1.0		
37	Wall Vent - RTM Area	VOC	0.3	PWL	20
		MMA	0.1		
		Styrene	0.3		
38p	Roof Vent - RTM Area	PM	1.0		37
		PM <sub>10</sub>	1.0		
38	Roof Vent - RTM Area	VOC	0.3		20

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			<b>lb/hr</b>	<b>tpy</b>	
		MMA	0.1		
		Styrene	0.3		
39p	Roof Vent - RTM Area	PM	1.0		37
		PM <sub>10</sub>	1.0		
39	Roof Vent - RTM Area	VOC	0.3		20
		MMA	0.1		
		Styrene	0.3		
39ap	Roof Vent - RTM Area	PM	1.0		37
		PM <sub>10</sub>	1.0		
39a	Roof Vent - RTM Area	VOC	0.3		20
		MMA	0.1		
		Styrene	0.3		
40	Saw Dust Collector Pultrusion	PM	2.3		37
		PM <sub>10</sub>	2.3		
40a	Pultrusion	VOC	0.3		20
		MMA	0.1		
		Styrene	2.3		
41	Saw Dust Collector Wood Shop	PM	2.3		39
		PM <sub>10</sub>	2.3		
42	Acetone Recovery Still Vent	Acetone	0.2		32
43	Virgin Acetone Tank	Acetone	13.4	PWL	32
44	Recovered Acetone Tank	Acetone	0.8		
45	Tank Vent - Waste Acetone	Acetone	1.6		
46p	Wall Vent for Gelcoat Booth	PM	0.1		20
		PM <sub>10</sub>	0.1		

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			<b>lb/hr</b>	<b>tpy</b>	
46	Wall Vent for Gelcoat Booth	VOC	0.6		
		MMA	0.1		
		Styrene	0.6		
46a	Wall Vent for Gelcoat Booth	VOC	0.6		20
		MMA	0.1		
		Styrene	0.6		
47p	Wall Vent for Gelcoat Booth	PM	0.1		
		PM <sub>10</sub>	0.1		
47	Wall Vent for Gelcoat Booth	VOC	0.6		
		MMA	0.1		
		Styrene	0.6		
48	Dust Collector Small Parts Building	PM	0.1		
		PM <sub>10</sub>	0.1		
48a	Dust Collector Small Parts Building	PM	0.1		
		PM <sub>10</sub>	0.1		
49	Small Parts Building Roof Vent Fiberglass Chop Shop	VOC	0.3	20	
		MMA	0.1		
		Styrene	0.3		
50	Small Parts Building Roof Vent Fiberglass Chop Shop	VOC	0.3		
		MMA	0.1		
		Styrene	0.3		
51	Small Parts Building Roof Vent Fiberglass Chop Shop	VOC	0.3	PWL	20
		MMA	0.1		
		Styrene	0.3		
52	Small Parts Building Roof Vent Fiberglass Chop Shop	VOC	0.3		
		MMA	0.1		
		Styrene	0.3		
53	Roof Vent - Gluing Station	VOC	0.3		32

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			<b>lb/hr</b>	<b>tpy</b>	
54	Roof Vent - Gluing Station	VOC	0.3		
55p	New Plant Building Non-Point Emission	PM PM <sub>10</sub>	2.3 2.3		37
55	New Plant Building Non-Point Emission	VOC	3.5		32
56	Utilities and Fenders Non-Point Emissions	Source Deleted			
57	RTM Area Non-Point Emissions	Source Deleted			
58	Tooling Building Non-Point Emissions	Source Deleted			
59p	Old Boat Repair Building	PM PM <sub>10</sub>	0.1 0.1	PWL	37
59	Old Boat Repair Building	VOC MMA Styrene	1.2 0.1 1.2		20
59a	New Boat Repair Building	Source Deleted			
59bp	Old Boat Repair Building	PM PM <sub>10</sub>	0.1 0.1	PWL	37
59b	Old Boat Repair Building	VOC MMA Styrene	1.2 0.1 1.2		20
60	Small Parts Building	Source Deleted			
61	Adhesive Area	Source Deleted			
62	Dust Collector for Sand Blasting	PM PM <sub>10</sub>	2.3 2.3	PWL	37
63p	Boat Repair Filter	PM	0.1		

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Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
	Vent	PM <sub>10</sub>	0.1		
63	Boat Repair Filter Vent	VOC	0.2		20
		MMA	0.1		
		Styrene	0.2		
64p	Boat Repair Filter Vent	PM	0.1		37
		PM <sub>10</sub>	0.1		
64	Boat Repair Filter Vent	VOC	0.2		20
		MMA	0.1		
		Styrene	0.2		
65p	Boat Repair Filter Vent	PM	0.1		37
		PM <sub>10</sub>	0.1		
65	Boat Repair Filter Vent	VOC	0.2		20
		MMA	0.1		
		Styrene	0.2		
66p	Boat Repair Filter Vent	PM	0.1		37
		PM <sub>10</sub>	0.1		
66	Boat Repair Filter Vent	VOC	0.2	PWL	20
		MMA	0.1		
		Styrene	0.2		
67p	Boat Repair Filter Vent	PM	0.1		37
		PM <sub>10</sub>	0.1		
67	Boat Repair Filter Vent	VOC	0.2		20
		MMA	0.1		
		Styrene	0.2		
68p	Boat Repair Filter Vent	PM	0.1		37
		PM <sub>10</sub>	0.1		
68	Boat Repair Filter Vent	VOC	0.2		20
		MMA	0.1		



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			<b>lb/hr</b>	<b>tpy</b>	
		Styrene	0.2		
69p	Boat Repair Filter Vent	PM	0.1		37
		PM <sub>10</sub>	0.1		
69	Boat Repair Filter Vent	VOC	0.2		20
		MMA	0.1		
		Styrene	0.2		
70p	Boat Repair Filter Vent	PM	0.1		37
		PM <sub>10</sub>	0.1		
70	Boat Repair Filter Vent	VOC	0.2		20
		MMA	0.1		
		Styrene	0.2		
71	Roof Vent - Trailer Repair	VOC	0.7		32
		Ethylene- Glycol	0.1		
72	Roof Vent - Trailer Repair	VOC	0.7		
		Glycol- Ether	0.1		
73	Wall Vent – Truck Shop	VOC	0.7	PWL	32
		Glycol- Ether	0.1		
74	Wall Vent - Truck Shop	VOC	2.0		
		Glycol- Ether	0.1		
75	Dust Collector Fenders and CCBM	PM	2.3		37
		PM <sub>10</sub>	2.3		

\* This is not included in the total VOC number.

- \*\* MMA- Methyl Methacrylate  
DMP- Dimethylphthalate  
MEK- Methyl ethyl ketone  
MIBK- Methyl isobutyl ketone  
PWL-Plantwide Limit

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

Ranger Boats/Wood Manufacturing Company has operated this facility since 1969. On January 29, 1990, the Department issued Ranger Boats its first air permit (0979-A). This permit was the result of a Consent Administrative Order (CAO) in which Ranger Boats agreed to pay a monetary penalty and to reduce its volatile organic compound (VOC) emissions to a level below the prevention of significant deterioration (PSD) threshold limit of 250 tons per year (tpy) in order to be eligible for a state implementation plan (SIP) permit. Air permit number 0979-A established permitted emission limits at 246.73 tpy of VOC.

On March 21, 1994, the Department issued a modified permit (0979-AR-1) which covered the relocation of the Boat Repair Department and established permitted emission limits at 12.9 tpy of particulate matter (PM/PM<sub>10</sub>) and 205.1 tpy of VOC.

A second permit modification was issued to Ranger Boats on June 14, 1996. Air permit number 0979-AR-2 was necessary in order to bring the facility into compliance after an inspection on May 5, 1995, determined that the facility was out of compliance with its current permit (0979-AR-1). Emissions at existing sources were revised and two sources (SN-73 and SN-74) were added in this modification. Air permit number 0979-AR-2 established total permitted emission limits at 13.5 tpy of PM/PM<sub>10</sub>, 99.4 tpy of VOC, and 113.0 tpy of acetone. Hazardous air pollutants (HAPs) emissions, which are included in the total VOC emissions, were listed as 55.9 tpy of styrene, 0.9 tpy of methylene chloride, 21.8 tpy of toluene, 3.2 tpy of xylene, 0.4 tpy of propylene glycol monomethyl ether, 0.6 tpy of ethyl benzene, and 2.6 tpy of methyl ethyl ketone.

Permit 0979-AOP-R0, was the first operating permit issued to Ranger Boats under Regulation #26. The facility exceeded 100 tons/yr of VOC and 25 tons/yr of combined HAPs. The facility had made no significant changes in the operation. The reason for the increases in emissions is that the facility had maxed out the permitted throughputs. A number of facility wide bubbles had also been applied.

Permit 0979-AOP-R1, issued on November 8<sup>th</sup>, 2001, provided for the following :

- Revised HAP emissions, due to reformulation of resins, gel coats, adhesives, paints and catalysts;
- Increased PM emissions to SN-36, 37, 38, 39, 39a, 40, 41, 55, 70;
- Changed PM for SN-17, SN-23, SN-24, SN-25, SN-48, SN- 48a, SN-62;
- Added outdoor sandblasting operations;
- Implemented plantwide emission limits, a TLV table; and
- Includes the particulate emission sources under plant wide limits.

PM<sub>10</sub> increased to 3.6 tpy; there was no increase in VOC, single HAP, or combination HAP emissions.

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Permit 979-AOP-R2 was issued on April 26, 2002. Previously, the plant was permitted to take emission credits for acetone. With this permit modification a provision was made to allow the plant to take emission credits for other pollutants as well. Additionally, this permit allowed the substitution of MMA for styrene in the laminating process.

**SECTION IV: EMISSION UNIT INFORMATION**

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SN- 01	through	SN- 16a
SN- 26	through	SN- 39a
SN- 40	and	SN- 40a
SN- 46	through	SN- 47a
SN- 49	through	SN- 52
SN- 59	and	SN- 59b
SN- 63	through	SN- 70

Source Numbers 36p, 37p, 38p, 39p, and 39ap share the same location as the non “p” source but are considered particulate only sources and treated separately for Plant Wide emissions.

### **Styrene Emission Sources** **Laminating, Repair and Gel Coat Work-up Booths**

#### Source Description

Resins and gel coats are used only in the lamination process and are the only materials used at the facility that emit styrene and/or MMA. For this reason styrene and MMA are modeled and regulated differently from the other laminate emissions which are common to the paint and/or the glueing emissions.

#### SN-01 through SN-04 and N-13 through SN-16 New Bldg - Laminating/Gel Coat Booths

Molds made in the Tooling Building are lined with a styrene based paint (gel coat) by spraying. This permit gives an overall limit on gel coat in the Plantwide Conditions. These sources make up 93% of the total facility gel coat usage. Compliance is demonstrated by plantwide usage and production limits. MMA, toluene, MEK, and Styrene are the only VOCs in the gel coat.

#### SN-05 through SN-12 New Bldg - Fiberglass Chop Booth

After the gel coat has been applied to the mold, layers of fiberglass as styrene based resins are applied. These layers, laminated together, build up the boat. After the fiberglass has hardened, the boat is pulled out of the mold. Compliance is demonstrated by plantwide usage and production limits. Styrene is the only VOC in the resin.

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SN-26, SN-26a, SN-28, and SN-29 Fenders and CCBM - Laminating/Fiberglass Chop

Fenders and other resin based components are made in this area. This permit gives an overall limit on resins in the Plantwide Conditions. These sources make up 19.6% of the total facility resin usage. Compliance is demonstrated by plantwide usage and production limits. Styrene is the only VOC in the resin.

SN-27, SN-27a, SN-30, and SN-31 Fenders and CCBM - Laminating/Gel Coat

Fenders and other resin based components have gel coat applied to them in this area. This permit gives an overall limit on gel coats in the Plantwide Conditions. These sources make up 5.95% of the total facility gel coat usage. Compliance is demonstrated by plantwide usage and production limits. MMA, toluene, MEK, and Styrene are the only VOCs in the gel coat.

SN-32 through SN-39 CCBM Building - Laminating

Small parts are laminated at this source. This is a closed molding process. These sources are not included in the Plantwide resin usage. Styrene is the only VOC in the resin.

SN-46 and SN-47 Tooling Building - Laminating/Gel Coat Booth

This permit gives an overall limit on gel coats in the Plantwide Conditions. These sources make up 1.05% of the total facility gel coat usage. Compliance is demonstrated by plantwide usage and production limits.

MMA, toluene, MEK, and Styrene are the only VOCs in the gel coat.

SN-49 through SN-52 Small Parts Building - Laminating/Fiberglass Chop Booth

After the gelcoat has been applied to the mold, layers of fiberglass as styrene based resins are applied. These layers, laminated together, build up the boat. After the fiberglass has hardened, the boat is pulled out of the mold. Compliance is demonstrated by plantwide usage and production limits. Styrene is the only VOC in the resin.

SN-59, SN-59b, and SN-63 thru SN-70 Warranty/Service Shops (Old Boat Repair / Claudie's Repair and New Boat Repair)

These are areas used to fix minor problems including repair of blemishes and imperfection; damage; and refurbishing. The laminating, sanding, usage of foam, glueing, and painting make up less than one percent of the total emissions. Compliance is demonstrated by plant-wide usage and production limits.

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Lamination processes utilize various gel coats and resins. These materials contain varying amounts of styrene, methyl methacrylate (MMA), toluene, methyl ethyl ketone (MEK).

**Specific Conditions**

- 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	Laminating Emissions - Criteria Pollutants	Pollutant	lb/hr	tpy
01	Roof Vent for Lamination Booth	VOC	12.4	Plant Wide Limit
02	Roof Vent for Lamination Booth	VOC	12.4	
03	Roof Vent for Lamination Booth	VOC	12.4	
04	Roof Vent for Lamination Booth	VOC	12.4	
05	Roof Vent for Lamination Booth	VOC	12.4	
06	Roof Vent for Lamination Booth	VOC	12.4	
07	Roof Vent for Lamination Booth	VOC	12.4	
08	Roof Vent for Lamination Booth	VOC	12.4	
09	Roof Vent for Lamination Booth	VOC	12.4	
10	Roof Vent for Lamination Booth	VOC	12.4	
11	Roof Vent for Lamination Booth	VOC	12.4	
12	Roof Vent for Lamination Booth	VOC	12.4	
13	Roof Vent for Lamination Booth	VOC	12.4	
14	Roof Vent for Lamination Booth	VOC	12.4	
15	Roof Vent for Lamination Booth	VOC	12.4	
16	Roof Vent for Lamination Booth	VOC	12.4	
16a	Roof Vent for Lamination Booth	VOC	12.4	
26	Roof Vent for Lamination	VOC	2.8	
26a	Roof Vent for Lamination	VOC	2.8	
26b	Roof Vent for Lamination	VOC	2.8	
27	Roof Vent for Gel Coat	VOC	2.8	
27a	Roof Vent for Gel Coat	VOC	2.8	
28	Roof Vent for Lamination	VOC	2.8	

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<b>SN</b>	<b>Laminating Emissions - Criteria Pollutants</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
29	Roof Vent for Lamination	VOC	2.8	Plant Wide Limit
30	Roof Vent for Lamination	VOC	2.8	
31	Roof Vent for Lamination	VOC	2.8	
32	Wall Vent - CCBM Area	VOC	0.3	
32a	Wall Vent - CCBM Area	VOC	0.3	
33	Wall Vent - CCBM Area	VOC	0.3	
34	Wall Vent - CCBM Area	VOC	0.3	
35	Wall Vent - CCBM Area	VOC	0.3	
36	Wall Vent - CCBM Area	VOC	0.3	
37	Wall Vent - CCBM Area	VOC	0.3	
38	Roof Vent - CCBM Area	VOC	0.3	
39	Roof Vent - CCBM Area	VOC	0.3	
39a	Wall Vent - CCBM Area	VOC	0.3	
40a	Pultrusion	VOC	2.5	
46	Roof Vent for Lamination	VOC	0.6	
46a	Roof Vent for Lamination	VOC	0.6	
47	Wall Vent for Lamination	VOC	0.6	
47a	Wall Vent for Lamination	VOC	0.6	
49	Roof Vent for Lamination, Sm Prts Bldg	VOC	0.3	
50	Roof Vent for Lamination, Sm Prts Bldg	VOC	0.3	
51	Roof Vent for Lamination, Sm Prts Bldg	VOC	0.3	
52	Roof Vent for Lamination, Sm Prts Bldg	VOC	0.3	
59	Old Boat Repair Bldg	VOC	1.2	
59b	Caludie's Repair Bldg	VOC	1.2	
63	Boat Repair Filter Vent	VOC	0.2	
64	Boat Repair Filter Vent	VOC	0.2	
65	Boat Repair Filter Vent	VOC	0.2	
66	Boat Repair Filter Vent	VOC	0.2	
67	Boat Repair Filter Vent	VOC	0.2	
68	Boat Repair Filter Vent	VOC	0.2	Plant Wide
69	Boat Repair Filter Vent	VOC	0.2	



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SN	Laminating Emissions - Criteria Pollutants	Pollutant	lb/hr	tpy
70	Boat Repair Filter Vent	VOC	0.2	Limit

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.

SN	Laminating Emissions - Non Criteria Pollutants	Pollutant	lb/hr	tpy
	*MMA may be substituted for Styrene for sources listed			
01	Laminating Work-up Booth	Styrene*	11.33	PWL
		MMA	0.33	
02	Laminating Work-up Booths	Styrene	11.33	
		MMA	0.33	
03	Laminating Work-up Booths	Styrene	11.33	
		MMA	0.33	
04	Laminating Work-up Booths	Styrene	11.33	
		MMA	0.33	
05	Laminating Work-up Booths	Styrene	11.33	
		MMA	0.33	
06	Laminating Work-up Booths	Styrene	11.33	
		MMA	0.33	
07	Laminating Work-up Booths	Styrene	11.33	PWL
		MMA	0.33	
08	Laminating Work-up Booths	Styrene	11.33	
		MMA	0.33	
09	Laminating Work-up Booths	Styrene	11.33	
		MMA	0.33	
10	Laminating Work-up Booths	Styrene	11.33	PWL
		MMA	0.33	
11	Laminating Work-up Booths	Styrene	11.33	
		MMA	0.33	
12	Laminating Work-up Booths	Styrene	11.33	PWL
		MMA	0.33	

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SN	<b>Laminating Emissions - Non Criteria Pollutants</b> *MMA may be substituted for Styrene for sources listed	Pollutant	lb/hr	tpy	
13	Laminating Work-up Booths	Styrene MMA	11.33 0.33		
14	Laminating Work-up Booths	Styrene MMA	11.33 0.33		
15	Laminating Work-up Booths	Styrene MMA	11.33 0.33		
16	Laminating Work-up Booths	Styrene MMA	11.33 0.33		
16a	Laminating Work-up Booths	Styrene MMA	11.33 0.33		
26	ChopBooth	Styrene MMA	2.52 0.07		
26a	ChopBooth	Styrene MMA	2.52 0.07		
26b	ChopBooth	Styrene MMA	2.52 0.07		
27	ChopBooth	Styrene MMA	2.52 0.07		
27a	ChopBooth	Styrene MMA	2.52 0.07		
28	ChopBooth	Styrene MMA	2.52 0.07		
29	ChopBooth	Styrene MMA	2.52 0.07		
30	ChopBooth	Styrene MMA	2.52 0.07		
31	ChopBooth	Styrene MMA	2.52 0.07		PWL
32	CCBM Building, Laminating	Styrene MMA	0.3 0.01		

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SN	<b>Laminating Emissions - Non Criteria Pollutants</b> *MMA may be substituted for Styrene for sources listed	Pollutant	lb/hr	tpy
32a	CCBM Building, Laminating	Styrene MMA	0.3 0.01	PWL
33	CCBM Building, Laminating	Styrene MMA	0.3 0.01	
34	CCBM Building, Laminating	Styrene MMA	0.3 0.01	
35	CCBM Building, Laminating	Styrene MMA	0.3 0.01	
36	CCBM Building, Laminating	Styrene MMA	0.3 0.01	
37	CCBM Building, Laminating	Styrene MMA	0.3 0.01	
38	CCBM Building, Laminating	Styrene MMA	0.3 0.01	
39	CCBM Building, Laminating	Styrene MMA	0.3 0.01	
39a	CCBM Building, Laminating	Styrene MMA	0.3 0.01	
40a	Pultrusion	Styrene MMA	2.27 0.06	
46	Tooling Bldg	Styrene MMA	0.57 0.015	
46a	Tooling Bldg	Styrene MMA	0.57 0.015	
47	Tooling Bldg	Styrene MMA	0.57 0.015	
47a	Tooling Bldg	Styrene MMA	0.57 0.015	
49	Small Parts Bldg	Styrene MMA	0.28 0.01	

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SN	<b>Laminating Emissions - Non Criteria Pollutants</b> *MMA may be substituted for Styrene for sources listed	Pollutant	lb/hr	tpy	
50	Small Parts Bldg	Styrene MMA	0.28 0.01		
51	Small Parts Bldg	Styrene MMA	0.28 0.01		
52	Small Parts Bldg	Styrene MMA	0.28 0.01		
59	Old Boat Repair Bldg	Styrene MMA	1.13 0.03		
59b	Claudies Repair Bldg	Styrene MMA	1.13 0.03		
63	New Boat Repair Bldg	Styrene MMA	0.14 0.01		
64	New Boat Repair Bldg	Styrene MMA	0.14 0.01		
65	New Boat Repair Bldg	Styrene MMA	0.14 0.01		
66	New Boat Repair Bldg	Styrene MMA	0.14 0.01		
67	New Boat Repair Bldg	Styrene MMA	0.14 0.01		
68	New Boat Repair Bldg	Styrene MMA	0.14 0.01		
69	New Boat Repair Bldg	Styrene MMA	0.14 0.01		PWL
70	New Boat Repair Bldg	Styrene MMA	0.14 0.01		

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3. Pursuant to §18.1004 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 styrene percent tabulated in the following table. Additionally all styrene emissions shall be permitted only from the laminating process:

Material	Maximum Styrene Content % by Weight
Resins	41.0
Gel Coats	48.0
Solvent	100

Compliance with this specific condition shall be demonstrated by Specific Condition #12.

4. Pursuant to §18.1004 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 may use a styrene substitute if the replacement chemical has an equal or higher TLV, if the replacement chemical is used exclusively for laminating, if the emission factor for the styrene substitutes is less than or equal styrene and if:

Material	Maximum of Styrene Replacement Chemical Content % by Weight
Resins	41.0
Gel Coats	48.0
Solvent	100

or if the chemical satisfies the Plantwide Condition #12. Compliance with this specific condition shall be demonstrated by Specific Condition #12.

5. Pursuant to §18.1004 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 MMA percent tabulated in the following table; additionally all MMA emissions shall result only from the laminating process (glueing uses MMA containing materials, this MMA is not emitted):

Material	Maximum MMA Content % by Weight



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Material	Maximum MMA Content % by Weight
Resins	41
Gel Coats	48
Solvent	100

Compliance with this specific condition shall be demonstrated by Specific Condition #12.

6. Pursuant to §18.1004 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 may use a MMA substitute if the replacement chemical has an equal or higher TLV, if the replacement chemical is used exclusively for laminating, if the emission factor for the MMA substitute is less than or equal to MMA and if:

Material	Maximum of MMA Replacement Chemical Content % by Weight
Resins	41
Gel Coats	48
Solvent	100

or if the chemical satisfies the Plantwide Condition #12. Compliance with this specific condition shall be demonstrated by Specific Condition #12.

7. Pursuant to §18.1004 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 maximum of 4,800 total sqft per calendar day.

$$sqft = \sum_{day} length * width \text{ of each boat}$$

Compliance with this specific condition shall be demonstrated by Specific Condition #12.

8. Pursuant to §18.1004 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 below tabulated maximum monthly usage:


Material	Maximum Monthly Usage
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	(lb)
Gel Coats	171,000
Resins	781,200
Styrene Solvents	16,290

Compliance with this specific condition shall be demonstrated by Specific Condition #12.

9. Pursuant to §18.1004 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 may use only laminate materials having chemicals that satisfies the TLV table, Plantwide Condition #12, with the exception of styrene, styrene substitutes, MMA, and MMA substitutes.
10. Pursuant to §19.501 of the Arkansas Air Pollution Control Code (Regulation #19) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall show compliance with yearly VOC emissions (SC#1) by Plantwide Condition 
11. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation #18), and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall show compliance with yearly HAPs emissions (SC#2) by Specific Condition #12 and Plantwide Condition #15.
12. Pursuant to §18.1004 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 demonstrate compliance with the listed Specific Conditions by keeping a log showing the following:

	SC#	Data Logged	Frequency
12-a	4	TLV data for styrene substitutes	Per purchase
		Emissions factor for styrene substitute	Per purchase

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	SC#	Data Logged	Frequency
12-b	6	TLV data for MMA substitute	per purchase
		Emissions factor for MMA substitute	per purchase
12-c	3	Resin Maximum % Styrene	per Purchase
		Resin Maximum % Styrene Substitute	per Purchase
		Gel Coat Maximum % Styrene	per Purchase
		Gel Coat Maximum % Styrene Substitute	per Purchase
12-d	5	Gel Coat Maximum % MMA	per Purchase
		Gel Coat Maximum % MMA Substitute	per Purchase
12-e	7	sqft/day	Daily
12-f	8	Maximum Gel Coat Usage	Monthly
		Maximum Resin Usage	Monthly
		Maximum Styrene Solvent Usage	Monthly

The log shall be kept in a monthly file with records updated by the end of the month following the month to which the records pertain. The records shall be sufficient to enable the department to determine compliance. The records shall be kept on site, made available to Department personnel upon request, and submitted every six months in accordance with the requirements of General Provision 7.



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SN- 18        through        SN- 22  
SN- 42        through        SN- 45  
SN- 53        through        SN- 55  
SN- 71        through        SN- 74

Source Number 55p shares the same location as the non “p” source but is considered a particulate only source and treated separately for Plant Wide emissions.

**Emission Sources**  
**Paint Prep, Painting, Waxing, Cleaning, and Glueing**

Source Description

SN-18

This storage tank supplies the system with pure acetone for the process. The tank has a capacity of 10,000 gallons, and emissions were calculated from the TANKS program. This tank is not subject to NSPS Subpart Kb because the capacity is less than 19,815 gallons.

SN-19, SN-20, and SN-45

Waste acetone is collected and stored in these tanks. Each of these tanks has a capacity of 450 gallons, and emissions were calculated using the TANKS program.

SN-21 and SN-22

These spray paint booths are used to paint various parts in the trailer shop. This permit gives an overall limit on paint in the Plantwide Conditions. These sources make up 96% of the total paint usage.

SN-42 Acetone Recovery Still Vent

This system is used to recover some of the acetone used at this facility.

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SN-43 Virgin Acetone Tank

This is a 3,500 gallon acetone tank. The emissions from this source were estimated using the TANKS program.

SN-44 Recovered Acetone Tank

This tank stores acetone recovered from the facility. The tank has a capacity of 450 gallons.

SN-53 and SN-54 Adhesive Application Area

In this area, adhesive is applied to various parts such as seats and trim.

SN-55 Plantwide Non-Point Source

This source accounts for the loss of acetone and catalysts used throughout the facility.

SN-71 and SN-72 Trailer Repair Department - Paint Spray Booths

Trailers are repaired and repainted in this area. This department makes up 1.0% of the total paint usage. There is a plantwide limit on paint used at this facility. Compliance is demonstrated by plantwide usage and production limits.

SN-73 and SN-74 Truck Shop Paint Spray Booths

Trailers are repaired and repainted in this area. This department makes up 1.0% of the total paint usage. Compliance is demonstrated by plantwide usage and production limits.

**Specific Conditions**

13. 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	Painting Emissions - Criteria Pollutants	Pollutant	lb/hr	tpy
18	Tank Vent -Virgin Acetone	No Criteria Pollutants		
19	Tank Vent -Waste Acetone			
20	Tank Vent -Waste Acetone			



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SN	Painting Emissions - Criteria Pollutants	Pollutant	lb/hr	tpy
21	Roof Vent - Paint Spray Booth	VOC	64.1	Plant Wide Limit
22	Roof Vent - Paint Spray Booth	VOC	64.1	
42	Acetone Recovery Still	No Criteria Pollutants		
43	Virgin Acetone Tank			
44	Recovered Acetone Tank			
45	Tank Vent Waste Acetone			
53	Roof Vent Glueing Station	VOC	20.5	
54	Wall Vent Glueing Station	VOC	20.5	
55	Non Point	VOC	3.5	
71	Roof Vent - Trailer Repair	VOC	0.7	
72	Roof Vent - Trailer Repair	VOC	0.7	

Compliance with SC# 13 shall be demonstrated by SC# 7 and Plantwide Condition #15.

14. 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	Painting Emissions - Non Criteria Pollutants	Pollutant TLV Table Plantwide Condition #12	lb/hr	tpy
18	Tank Vent -Virgin Acetone	acetone	TLV	Plant Wide Limit
19	Tank Vent -Waste Acetone	acetone	Table	
20	Tank Vent -Waste Acetone	acetone	PWC	
21	Roof Vent - Paint Spray Booth	acetone	TLV Table PWC #8	Plant Wide Limit
		propylene glycol monomethyl ether acetate		
		diethylene glycol monomethyl ether		
		propylene glycol monomethyl ether		
21	Roof Vent - Paint Spray Booth	ethylene glycol monobutyl ether acetate	TLV Table PWC #12	Plant Wide Limit
22	Roof Vent - Paint Spray Booth	acetone		
		propylene glycol		

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SN	Painting Emissions - Non Criteria Pollutants	Pollutant TLV Table Plantwide Condition #12	lb/hr	tpy
		monomethyl ether acetate		
		diethylene glycol monomethyl ether		
		propylene glycol monomethyl ether		
		ethylene glycol monobutyl ether acetate		
42	Acetone Recovery Still	acetone		
43	Virgin Acetone Tank	acetone		
44	Recovered Acetone Tank	acetone		
45	Tank Vent Waste Acetone	acetone		
53	Roof Vent Glueing Station	acetone		
54	Wall Vent Glueing Station	acetone		
55	New Bldg - Non Point	acetone		
71	Roof Vent - Trailer Repair	acetone		
72	Roof Vent - Trailer Repair	acetone		

Compliance with SC#14 shall be demonstrated by Plantwide Condition #12 and #15.

15. Pursuant to §19.501 of the Arkansas Air Pollution Control Code (Regulation #19) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall show compliance with yearly VOC emissions (SC#13) by Plantwide Condition #15.
16. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation #18), and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall show compliance with yearly HAPs emissions (SC#14) by Plantwide Condition #15.
17. Pursuant to §18.1004 of the Arkansas Air Pollution Control Code (Regulation #18), and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee may use annual (twelve month) emission credits for cleaning solvents pollutants that are shipped off site. These credits shall be established by monitoring and recording of the below listed data for each of the credited pollutants as determined by the permittee:
  - a. Pounds of pollutant delivered to the plant during any calendar month;

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- b. Pounds of waste transferred out of the plant during any calendar month;
- c. The percent of pollutant in the waste shipped off-site, as established by a composite sample of all containers being shipped, and as analyzed by an outside laboratory;
- d. Pounds of pollutant transferred out of the plant during any calendar month;
- e. Pollutant emissions (delivered - transferred) during any twelve month rolling period.
- f. Pounds of waste awaiting shipment.

Additionally:

- a. Record keeping for each pollutant's emission credit must start a minimum of thirty days before the actual emission credit is taken;
- b. Pollutant emission credits may not be taken for wastes generated thirty days prior to each pollutant's first used credit;

Records shall be updated by the fifteenth day of the month following the month to which the records pertain and shall be continued for a minimum of twelve months after the discontinued use of the emission credit. The records shall be kept on site, made available to Department personnel upon request, and submitted every six months in accordance with the requirements of General Provision 7.

- 18. Pursuant to §18.1004 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 may use acetone substitutes, waxes and cleaners that satisfies the Plantwide Condition #12.

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SN- 17		
SN- 23	through	SN- 25
SN- 36p		SN- 37p
SN- 38p		SN- 39p
SN- 39ap		SN- 40
SN- 41		SN- 46p
SN- 47p		SN- 59p
SN- 59bp		SN- 48
SN- 48a		SN- 55p
SN- 62p		SN- 63p
SN- 64p		SN- 65p
SN- 66p		SN- 67p
SN- 68p		SN- 69p
SN- 70p		SN- 70a
SN- 75		

Source Numbers with a “p” suffix share the same location as the non “p” source but are considered a particulate only source and treated separately for Plant Wide emissions.

### **Grinding and Sanding, Dust Collector**

#### Source Description

Emissions are based on all dust collectors being 95% efficient and having an emission factor of 0.01 grains per cubic foot.

#### SN-17 New Plant Building - Grinding and Sanding Dust Collector

After removal from molds, various boat components are sanded. The emissions from the sanding operations are vented to dust collectors to remove particulate.

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SN-23 Small Parts Building - Buffing and Grinding Dust Collector

Vacuuming is used to control the general dust generated. The vacuums are vented to a dust collector to remove particulate.

SN-24 Fenders and Utilities - Grinding and Sanding Dust Collector

Fenders and other various parts are sanded, and the dust is collected in this dust collector.

SN-25 and SN-62 Trailer Shop - Sandblasting Dust Collector

Emissions from the sandblasting operation are vented to this dust collector. The collector is 95% efficient. Emissions from this source are based on a baghouse emission factor of 0.01 grains per cubic foot.

SN-36p, SN-37p, SN-38p, and SN-39ap CCBM Building Vents  
SN-55p Plantwide Non-Point Sources

These sources although physically identical to the non "p" suffix sources are included here for the purpose of plantwide particulate emissions.

SN-40 Pultrusion Dust Collector

This system collects dust created in the pultrusion process.

SN-41 Wood Shop - Dust Collector  
SN-48 and SN-48a Small Parts Building - Sanding Dust Collector

SN-46p, SN-47p Gel Coat Booths; SN-59p, SN-59bp, and SN-63p through SN-70p - Repair Booths

Some hand sanding may take place in the gel coat booths and in the repair booths. Emissions generated by the hand sanding operations are uncontrolled.

SN-75 New CCBM Dust Collector

This dust collector collects the dust generated in the Closed Cavity Bag Moulding (CCBM) Building sanding/buffing operation.

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**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	Sanding Emissions - Criteria Pollutants	Pollutant	lb/hr	tpy
17	DC for sanding and grinding	PM <sub>10</sub>	0.2	Plant Wide Limit
23	DC for cutting and sanding	PM <sub>10</sub>	0.2	
24	DC for fenders	PM <sub>10</sub>	2.3	
25	DC for sand blasting	PM <sub>10</sub>	4.6	
36p	Wall vent - CCBM	PM <sub>10</sub>	1.0	
37p	Wall vent - CCBM	PM <sub>10</sub>	1.0	
38p	Roof vent - CCBM	PM <sub>10</sub>	0.1	
39p	Roof vent - CCBM	PM <sub>10</sub>	0.1	
39ap	Wall vent - CCBM	PM <sub>10</sub>	0.1	
40	DC pultrusion	PM <sub>10</sub>	2.3	
41	DC wood shop	PM <sub>10</sub>	2.3	
46p	Wall Vent for Gelcoat Booth	PM <sub>10</sub>	0.1	
47p	Wall vent for Gelcoat Booth	PM <sub>10</sub>	0.1	
48	DC small parts bldg	PM <sub>10</sub>	0.1	
48a	DC small parts bldg	PM <sub>10</sub>	0.1	
55p	New plant bldg - non point	PM <sub>10</sub>	5.0	
59p	Old Boat Repair Building	PM <sub>10</sub>	0.1	
59bp	Old Boat Repair Building	PM <sub>10</sub>	0.1	
62	DC sand blasting	PM <sub>10</sub>	2.3	
63p	Boat Repair Filter Vent	PM <sub>10</sub>	0.1	
64p	Boat Repair Filter Vent	PM <sub>10</sub>	0.1	
65p	Boat Repair Filter Vent	PM <sub>10</sub>	0.1	
66p	Boat Repair Filter Vent	PM <sub>10</sub>	0.1	
67p	Boat Repair Filter Vent	PM <sub>10</sub>	0.1	
68p	Boat Repair Filter Vent	PM <sub>10</sub>	0.1	



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SN	Sanding Emissions - Criteria Pollutants	Pollutant	lb/hr	tpy
69p	Boat Repair Filter Vent	PM <sub>10</sub>	0.1	
70p	Boat Repair Filter Vent	PM <sub>10</sub>	0.1	
75	CCBM New Dust Collector	PM <sub>10</sub>	2.3	

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	Sanding Emissions - Non Criteria Pollutants	Pollutant	lb/hr	tpy
17	DC for sanding and grinding	PM	0.2	Plant Wide Limit
23	DC for cutting and sanding	PM	0.2	
24	DC for fenders	PM	2.3	
25	DC for sand blasting	PM	4.6	
36p	Wall vent - CCBM	PM	1.0	
37p	Wall vent - CCBM	PM	1.0	
38p	Roof vent - CCBM	PM	0.1	
39p	Roof vent - CCBM	PM	0.1	
39ap	Wall vent - CCBM	PM	0.1	
40	DC pultrusion	PM	2.3	
41	DC wood shop	PM	2.3	
46p	Wall Vent for Gelcoat	PM	0.1	
47p	Wall Vent for Gelcoat	PM	0.1	
48	DC small parts bldg	PM	0.1	
48a	DC small parts bldg	PM	0.1	
55p	New plant bldg - non point	PM	5.0	
59p	Old Boat Repair Bldg.	PM	0.1	
59bp	Old Boat Repair Bldg.	PM	0.1	
62	DC sand blasting	PM	2.3	
63p	Boat Repair Filter Vent	PM	0.1	
64p	Boat Repair Filter Vent	PM	0.1	

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SN	Sanding Emissions - Non Criteria Pollutants	Pollutant	lb/hr	tpy
65p	Boat Repair Filter Vent	PM	0.1	Plant Wide Limit
66p	Boat Repair Filter Vent	PM	0.1	
67p	Boat Repair Filter Vent	PM	0.1	
68p	Boat Repair Filter Vent	PM	0.1	
69p	Boat Repair Filter Vent	PM	0.1	
70p	Boat Repair Filter Vent	PM	0.1	
75	CCBM New Dust Collector	PM	2.3	

16. Pursuant to §19.303 of Regulation 19, and A.C.A §8-4-203 as referenced by §8-4-304 and §8-4-311, baghouses associated with this facility shall be operated and maintained in serviceable condition as prescribed by the manufacturer during operation of this facility. The baghouses shall be inspected as necessary, but no less than once per week, to assure that the baghouse(s) are in good working condition.

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

Ranger Boats/ Wood Manufacturing Company, Inc. is in compliance with the applicable regulations cited in the permit application. Ranger Boats/ Wood Manufacturing Company, Inc. will continue to operate in compliance with those identified regulatory provisions.

Ranger Boats/ Wood Manufacturing Company, Inc. is subject to 40 CFR 63 Subpart VVVV that was promulgated on August 22, 2001. The facility will examine and determine the necessary action required and will implement the action required by the regulation. Compliance with the regulation must be by August 23, 2004. The Permittee must submit a permit modification implementing the Subpart VVVV no later than February 23, 2004.

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 §18.1004 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 use Threshold Limit Values as determined by the most recent ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs). If no TLV is available from this source, the facility may request the use of an alternate value from the Department.
8. Pursuant to §19.501 of the Arkansas Air Pollution Control Code (Regulation #19) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall calculate VOC emissions on the basis of a material balance with the exception of:
  - a. MMA, MMA substitutes, styrene, and styrene substitutes contained in gel coats and resins which shall be calculated using AP-42 Emission Factors or Factors from the National Marine Manufacturers Association and
  - b. Non emitted glue VOCs (MMA and MDI).
9. 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 calculate single HAP emissions on the basis of a material balance with the exception of:
  - a. MMA, MMA substitutes, styrene, and styrene substitutes contained in gel coats and resins which shall be calculated using AP-42 Emission Factors or Factors from the National Marine Manufacturers Association and
  - b. Non emitted glue HAPs.
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 calculate Combination HAPs emissions on the basis of a material balance with the exception of:

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- a. MMA, MMA substitutes, styrene, and styrene substitutes contained in gel coats and resins which shall be calculated using AP-42 Emission Factors or Factors from the National Marine Manufacturers Association and
  - b. Non emitted glue HAPs.
11. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, weekly observations of the opacity shall be conducted by personnel familiar with the permittee’s visible emissions. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess opacity as indicated in the following table are detected,

SN	Opacity %	Justification
17, 23, 24, 25, 40, 41, 48, 48a, 62, 75	5	18.501

the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated per occurrence, kept on site, and made available to Department personnel upon request.

- a. The date, time, and location that opacity greater than permitted was observed.
  - b. The cause of the exceedance of the opacity limit
  - c. The corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
  - d. The name of the person conducting the opacity observations.
12. Pursuant to §18.1004 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, for all chemicals except for MMA, MMA substitutes, styrene, and styrene substitutes contained in gel coats and resins, not exceed emissions as noted in the following table:



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<b>Any Single TLV (in mg/m<sup>3</sup>) must be greater than the TLV tabulated below</b>	
<b>Single HAP Minimum TLV (mg/m<sup>3</sup>)</b>	<b>Single HAP Pollutant emission per month (tons)</b>
11290.0	35.0
9680.0	30.0
8060.0	25.0
6450.0	20.0
4840.0	15.0
3230.0	10.0
1610.0	5.0
1290.0	4.0
970.0	3.0
650.0	2.0
320.0	1.0

13. Pursuant to §19.501 of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the Plantwide VOC ton per year emission rates. Compliance with this condition will be shown by Plantwide Condition #15.

<b>Pollutant</b>	<b>tpy</b>
VOC	246.5

14. Pursuant to §18.801 of Regulation #18 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the plantwide single HAP tons per year emission rates nor the combination HAP tons per year emission rate. Compliance with this condition will be shown by Plantwide Condition #15.

<b>Pollutant</b>	<b>tpy</b>
Single HAP	169.6
Combination HAPs	330.6

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15. Pursuant to §18.1004 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall demonstrate compliance with the listed Specific Conditions by keeping a log showing the following:

<b>Cond Ref</b>	<b>Data Logged</b>	<b>Frequency</b>	<b>A rolling 12 month</b>
Plant Wide	Name and tons usage for each material that contains VOCs and/or HAPs	Monthly	Plant Wide Total
	MSDS Documents (legible) for each material used in the manufacturing, waxing, and cleaning of boats, boat parts, and boat trailers that yield pollutants	First purchase & yearly update	
	Tons used of VOCs	Monthly	Plant Wide Total
	Tons emitted of VOCs	Monthly	Plant Wide Total
	Tons used of each HAP	Monthly	Plant Wide Total
	Tons emitted of each HAP	Monthly	Plant Wide Total
	Emissions of combined HAPs	Monthly	Plant Wide Total

The log shall be kept in a monthly file with records updated by the fifteenth day of the month following the month to which the records pertain. The records shall be sufficient to enable the department to determine compliance. These records shall be maintained for five years, kept on site, made available to Department personnel upon request and submitted every six months in accordance with the requirements of General Provision 7.

16. Pursuant to §19.304 of Regulation 19, 40 CFR Part 63, Subpart VVVV, and A.C.A. '8-4-203 as referenced by '8-4-304 and '8-4-311, the permittee shall submit a permit modification application demonstrating how Ranger Boats will comply with 40 CFR Part 63, Subpart VVVV – *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing* or the permittee will submit a notification citing how the current permit demonstrates compliance with the subpart. The application or notification must be submitted no later than 180 days prior to August 23, 2004.



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**SECTION VII: INSIGNIFICANT EMISSION SOURCES**

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 January 14, 2000.

The following has been determined to be insignificant:

<b>Description</b>	<b>Category</b>
Diesel Storage Tanks	Group A. 2

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix 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;

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- d. The analytical techniques or methods used;
  - 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,

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- 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.

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.

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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.
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

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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;
  - 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:

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- 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.

## APPENDIX A



