

ADEQ OPERATING AIR PERMIT

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

Permit #: 996-AOP-R1

IS ISSUED TO:

Baldor Electric Company - Fort Smith Plant
5711 R. S. Boreham Jr. Street
Fort Smith, AR 72901
Sebastian County
AFIN: 66-00041

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:

September 23, 1999

and

September 22, 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

February 11, 2003
Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE: Baldor Electric Company - Fort Smith Plant
AFIN: 66-00041
PERMIT NUMBER: 996-AOP-R1

FACILITY ADDRESS: 5711 R. S. Boreham Jr. Street
Fort Smith, AR 72901

COUNTY: Sebastian

CONTACT POSITION: Mr. Bobby Beutelschies

TELEPHONE NUMBER: (501) 648-5804

REVIEWING ENGINEER: M. Lloyd Davis, P. E.

UTM North-South (X): 3911.0 km
UTM East-West (Y): 369.7 km

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SECTION II: INTRODUCTION

Baldor Electric Company, in Fort Smith, Sebastian County, Arkansas, manufactures medium horsepower electric motors (SIC Code 3621) for industrial use. The facility has been operating under permit # 996-AR-1, and emitting VOCs at a rate of over 100 tons/year from its painting operations. This level of emissions requires a Title V application, and the documentation submitted with the application shows that VOCs will eventually be emitted at a rate of 188.8 tons/year. The VOC emissions include six solvents classified as HAPs. Title III Hazardous Air Pollutants (HAPs) will be released at a maximum rate of 115.8 tpy, well above the 25 tpy threshold requiring Title V permitting.

Motor components are made in other Baldor plants or supplied by vendors. These are: steel laminations, magnet wire, shaft stock, bands (steel, aluminum, and cast iron), bases, rotor cores, end plates, fans, bearings, conduit boxes and lids, insulators, retaining rings, screws, etc. Manufacturing operations include: cutting and machining shafts; machining, drilling and tapping bands, end plates and other parts; winding magnet wire and connecting leads; varnishing; assembly; painting; electrical and mechanical testing; packaging; and shipping.

Inserting insulators and winding magnet wire on stacked laminations is the first step in stator formation. This "stator core" is forced into a steel band to which a base and a conduit box have been welded. Wire leads are connected by brazing. The magnet wire is insulated and locked in place by impregnation with varnish to form the STATOR. The moving component of the eventual motor, the ROTOR, begins as a steel round stock which is cut and machined to form the motor shaft, and then forced into an aluminum/steel casting, the rotor core. A fan is spot-welded to the shaft, and the finished rotor receives a primer coating at paint booth SN-7. Lathes, drills and tapping machines prepare parts such as endplates for final assembly.

In the assembly area the rotor is inserted in its corresponding stator, and the other parts (bearings, endplates, etc.) are attached. Along the way several electrical and mechanical tests are performed. The finished motor is next moved to the main paint booth complex in Building #2 where 95% of the plant's entire paint use is applied with HVLP spray equipment. Transfer efficiencies are conservatively estimated at 50% for the HVLP spray guns. SN-A is an emission bubble that includes:

SN-02, SN-03, SN-05, SN-06(removed), and SN-21 paint spraying booths;
SN-08, SN-09, and SN-10 electric IR drying ovens associated with the painting operations;
miscellaneous sources of occasional painting including SN-07, SN-11, SN-12, and SN-13.

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On December 18, 1998, the permittee informed the Department of a number of changes that had taken place since the permit application was submitted, and requested that the permit application be updated as follows:

1. Baldor has acquired 38 acres of the land and buildings formerly owned by Crain Co. located directly west of Baldor's property, and 9 acres on the north side. These additions are included in Appendix D.
2. A small spray booth (SN-26) using insignificant amounts of aerosol paints has been transferred from Building #6 to Bay 1 of the former Crain plant.
3. SN-18 and SN-23, included in the SN-B grouping of natural gas-burning units have been described in more detail. SN-18 is a Bayco, Inc. incinerator used to burn off varnish solids from hangers and other equipment, and is rated at 1.5 MMBTU/hr. SN-23 is used to soften varnish on defective stators before removal, and is rated at 0.043 MMBTU/hr.
4. SN-19 and SN-25 are electrically heated ovens with no emissions.
5. A Process Flow Diagram is included in Appendix A.

The Title V application anticipates increased production and projects an annual use of 63,140 gallons of paint and 290,000 pounds of varnish solids (dry basis). A powder coating operation has been added, with essentially no emissions. To simplify accounting for emissions, the permit application "bubbles" all of the paint spraying and drying operations into a single source, SN-A. The varnish dipping and baking operation (SN-01) is the only other major source of VOCs and particulates, and emissions from natural gas combustion in the oven are included. The application also included other small natural gas combustion areas in addition to the major use in SN-01. These have been separated out into an SN-B "bubble."

Individual stacks are more fully described in the permit. There is no alternate scenario for operating the facility and no definite plans for using lower VOC paints, although a small scale powder coating operation may be tested out before trying to replace all of the solvent-based paints.

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table.

EMISSION SUMMARY				
SN	Description	Pollutant	Emission Rates	Cross

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			lb/hr	tpy	
Total Allowable Emissions		PM	2.0	8.9	N/A
		PM ₁₀	2.0	8.9	
		SO ₂	0.2	1.0	
		VOC ¹	46.2	189.3	
		CO	0.2	1.0	
		NO _x	0.8	3.6	
		VHAPs ²	36.0	145.5	
		DGME ³	7.7	30.9	
A	Paint Spraying Booths, Including: SN-02, SN-03, SN-05, SN-06(removed), SN-07, SN-11, SN-12, SN-13, and SN-21; also IR Ovens SN-08, SN-09, and SN-10	PM	1.8	7.9	8
		PM ₁₀	1.8	7.9	
		VOC ¹	36.0	145.5	
		VHAPs	36.0	145.5	
01	Varnish Application System and Varnish Oven Including: SN-01a, SN-01b, SN-01c, and SN-01d.	PM	0.1	0.5	11
		PM ₁₀	0.1	0.5	
		SO ₂	0.1	0.5	
		VOC ¹	10.1	43.3	
		CO	0.1	0.5	
		NO _x	0.4	1.8	
		DGME ²	7.7	30.9	
B	Natural Gas- Burning Processing Units, Including SN-14, SN-15R, SN-18 and SN-23	PM	0.1	0.5	13
		PM ₁₀	0.1	0.5	
		SO ₂	0.1	0.5	
		VOC	0.1	0.5	
		CO	0.1	0.5	
		NO _x	0.4	1.8	

1. VOC includes HAPs.

2. Does not include emissions of DGME

3. DGME = Diethylene Glycol Monobutyl Ether

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SECTION III: PERMIT HISTORY

The original air permit for the Fort Smith facility of Baldor Electric Company was issued on November 2, 1990. The current permit, 996-AR-1, added several additional stacks that were omitted from the original application, removed two sources that were no longer in use, and relocated and modified several sources. The permit itemized 25 separate sources. However, all of these are insignificant sources of emission except for the paint spraying operations and the electrical varnish dipping and baking operation. The permit limited VOCs to 165.3 tpy, and particulates to 30.2 tpy.

The annual emission report for 1996 listed 27,858 gallons of paint, 3,795 gallons of thinner, and 26,290 gallons of electrical varnish. About 4% of the paint and 80% of the thinner are shipped off-site as waste from the operation, leaving actual emissions at 98.8 tpy for 1996.

There was no separate accounting of hazardous air pollutants, which account for 66% of the VOCs emitted, based on 1996 paint usage and composition. Hours of operation were limited to 5,760 hours per year, and the permittee was required to investigate lower VOC painting technologies. Specific limitations restricted total paint and varnish consumption to 75,912 gallons total. Restrictions were also placed on natural gas consumption and welding wire usage.

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SECTION IV: EMISSION UNIT INFORMATION

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SN-A
 Spray Painting Operations

Source Description

SN-A is a “bubble” source that includes all of the paint spray booths in Building #2 and the paint ovens for accelerated drying of the coated parts. These include high volume-low pressure conventional spraying booths, SN-02 through SN-05, and SN-21, with transfer efficiencies estimated at 50%. All of these booths are equipped with filters rated at 85% efficiency to reduce emissions of paint particulates into the atmosphere.

The three drying ovens are designated SN-08, SN-09 and SN-10. These spray booths and ovens account for 95% of the emissions from SN-A.

The Service Department (which repairs motors) in Building #6 has two paint booths, SN-11 and SN-12, where grinding bases and repaired motors are painted on an intermittent basis. There is a paint booth, SN-07, in Building #5 used to prime rotors, and another booth, SN-13, used for maintenance projects.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), effective February 15, 1999, and 40 CFR Part 52, Subpart E, the permittee shall not exceed at emission points included in SN-A the emission rates set forth in the following table. Compliance with these emission rates will be demonstrated through the VOC content limit and the paint usage limit.

SN-#	Pollutant	lb/hr	tpy
SN-A Including: SN-02, SN-03, SN-05, SN-06(removed), SN-07, SN-08, SN-09, SN-10, SN-11, SN-12, SN-13	PM ₁₀ VOC	1.8 36.0	7.9 145.5

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 at SN-A the emission rates set forth in the following

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table. Compliance with these emission rates will be demonstrated through the HAP content limits and the paint usage limit.

Pollutant	lb/hr	tpy
PM	1.8	7.9
VHAPs	36.0	145.5

- Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the following VHAP emission rates at source SN-A for the designated TLV. The TLV of a particular compound will be determined using information on the appropriate MSDS or the most recent ACGIH data.

Minimum TLV, mg/m ³	Maximum HAP % of VOC content by weight
1.6	2.7
8.0	13.8
16.0	27.7
24.0	41.6
32.0	55.5
40.0	69.4
48.0	83.3
56.0	97.2
57.6	100

- Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause to be discharged to the atmosphere from any of the sources included in SN-A gases which exhibit an opacity greater than 5%. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.3.
- 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 conduct weekly observations of each of the sources

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comprising source SN-A. If any visible emissions are detected, the permittee shall take immediate action to identify and correct the cause of the visible emissions. After corrective action has been taken, the permittee shall conduct another observation of the source in question in order to verify that visible emissions are no longer present. The permittee shall maintain records of all visible emissions observations, the cause of any visible emissions, and any corrective action taken. These records shall be kept on site and shall be made available to Department personnel upon request. (NOTE: Visible emissions begin at approximately 5%. Therefore, any visible emissions would indicate an opacity level above the permitted limit of 5%. Also, these observations of sources with a 5% opacity limit do not need to be performed by an individual trained in EPA Reference Method 9.)

6. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use any paints at source SN-A which have a VOC content in excess of 6.0 pounds per gallon as applied or any cleaning solvents with a VOC content in excess of 7.0 pounds per gallon.
7. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the appropriate MSDS on site in order to demonstrate compliance with Specific Conditions 6 and 3 and which may be used by the Department for enforcement purposes. The permittee shall also maintain records in a manner similar, but not necessarily identical, to Appendix A. The MSDS shall be made available to Department personnel upon request.
8. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and §18.1004 of Regulation 18, the permittee shall not use in excess of 63,140 gallons of paint as applied at source SN-A in any consecutive twelve month period.
9. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of the paint usage at source SN-A in order to demonstrate compliance with Specific Condition 8 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request.

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SN-01
Varnish Application and Baking System

Source Description

SN-01 vents solvent emissions from the application of an electrical varnish to the wound magnet wire. The varnish consists of a polyester/melamine reactive concentrate, diluted with water. Natural gas is used as the exclusive fuel in the ovens, where dipped motors are baked at 350⁰ F to complete the chemical reaction. The oven is rated at 4.0 MMBTU/hr, and natural gas consumption will be limited plantwide over a 12 month rolling period.

Specific Conditions

10. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed at emission point SN-01 the emission rates set forth in the following table. Compliance with the emission rates listed below will be demonstrated by firing only natural gas and the allowable VOC content of the varnishes.

SN-#	Pollutant	lb/hr	tpy
SN-01	PM ₁₀	0.1	0.5
	SO ₂	0.1	0.5
	VOC	10.1	43.3
	CO	0.1	0.5
	NO _x	0.4	1.8

11. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed at SN-01 the total hazardous air pollutant (HAP) emission rates set forth in the following table. Compliance with the PM emission rates will be demonstrated by firing only natural gas. Compliance with the HAP emission rates will be demonstrated through compliance with the allowable HAP content of the varnishes.

Pollutant	lb/hr	tpy
PM	0.1	0.5
DGME	7.7	30.9

12. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause to be discharged to the atmosphere from SN-01 gases which exhibit an opacity greater than 5%. The opacity shall be measured in

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accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.3. Since the burning of natural gas and non-spray application of paints and varnishes produce only trace amounts of particulate matter, compliance with this condition does not require any visual observations.

13. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use any varnish at source SN-01 with a VOC content in excess of 2.0 lb/gal.
14. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed a maximum concentration of 1.5 lb/gal of Diethylene Glycol Monobutyl Ether in any product used at source SN-01.
15. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the appropriate MSDS on site in order to demonstrate compliance with Specific Conditions 13 and 14 and which may be used by the Department for enforcement purposes. The MSDS shall be made available to Department personnel upon request.
16. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use in excess of 290,000 pounds of varnish solids on a dry basis at source SN-01 in any consecutive twelve month period.
17. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of the amount of varnish used at source SN-01 in order to demonstrate compliance with Specific Condition 16 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request.
18. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and §18.1004 of Regulation 18, natural gas shall be the only fuel used to fire the Heating Ovens associated with SN-01. As all of these sources are permitted to operate at capacity for 8,760 hours per year, the Department is not requiring the permittee to maintain records of natural gas usage.

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SN-B
 Natural Gas-Burning Processing Units

Source Description

Four sources of combustion gases have been separated out from the submitted SN-01 “bubble” as they are distinctly different processes. These include the Powder Coating Oven (SN-14), the Evaporator (SN-15R), the Burn-off Oven (SN-18), and the Scrap Oven (SN-23). Visible emissions from the combustion of natural gas would be below a 5% opacity; however, decomposition of residues in SN-18 and SN-23 will result in intermittent higher opacities.

The total heat capacities of these units add up to 3.293 MMBTU/hr, and natural gas consumption will be limited plantwide over a 12 month rolling period.

Specific Conditions

19. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed at emission points included in SN-B the emission rates set forth in the following table. Compliance with these emission rates will be demonstrated by firing only natural gas.

SN-#	Pollutant	lb/hr	tpy
SN-B	PM ₁₀	0.1	0.5
Including: SN-14, SN-15R, SN-18, SN-23	SO ₂	0.1	0.5
	VOC	0.1	0.5
	CO	0.1	0.5
	NO _x	0.4	1.8

20. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-B. Compliance with these emission rates will be demonstrated by firing only natural gas.

SN-#	Pollutant	lb/hr	tpy
SN-B	PM	0.1	0.5
Including: SN-14, SN-15R, SN-18, SN-23			

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21. Pursuant to §18.501 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 not cause to be discharged to the atmosphere from any of the sources included in SN-B gases which exhibit an opacity greater than 5% except as outlined in Specific Condition 22. The opacity shall be measured in accordance with EPA Reference Method 9 as found in 40 CFR Part 60 Appendix A.3. Compliance with this opacity limit will be demonstrated by firing only natural gas at source SN-B.
22. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the opacity from source SN-B shall not exceed 20% opacity as measured by EPA Reference Method 9 when burning residuals at sources SN-18 and SN-23.
23. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and §18.1004 of Regulation 18, natural gas shall be the only fuel used to fire the Powder Coating Oven (SN-14), the Evaporator (SN-15R), the Burn-off Oven (SN-18), and the Scrap Oven (SN-23). As all of these sources are permitted to operate at capacity for 8,760 hours per year, the Department is not requiring the permittee to maintain records of natural gas usage.

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SECTION V: COMPLIANCE PLAN

Baldor Electric Company -Fort Smith Plant is in compliance with the applicable regulations cited in the permit application. Baldor Electric Company -Fort Smith Plant will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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 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. 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.
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 §18.801 of Regulation 18, the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the**

emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.

- 8. Pursuant to §18.901 of Regulation 18, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants from becoming airborne.**

Title VI Provisions

9. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
- a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
10. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.

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- 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.
- 11. 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.
- 12. 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.

- 13. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated March 12, 1997. The request for amendment was submitted on July 3, 2001.

Description	Category
Welding Stations (SN-16, SN-20)	Regulation 18, Appendix A, Number 7
Wastewater Evaporator (SN-15R, SN-22)	Regulation 18, Appendix A, Number 13
Powder Coating System (SN-14, SN-24)	Regulation 18, Appendix A, Number 9
Bayco Incinerator (SN-18)	Regulation 18, Appendix A, Number 1
Electric Oven (SN-19)	Regulation 18, Appendix A, Number 9
Scrap Recovery Oven (SN-23)	Regulation 18, Appendix A, Number 1
Master Ring Heater (SN-25)	Regulation 18, Appendix A, Number 1
Aerosol Spray Booth (SN-26)	Regulation 18, Appendix A, Number 9

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

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 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 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), 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 §26.4 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 C.F.R. 70.6(a)(1)(ii) and §26.7 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 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
 - A. The date, place as defined in this permit, and time of sampling or measurements;
 - B. The date(s) analyses were performed;
 - C. The company or entity that performed the analyses;
 - D. The analytical techniques or methods used;
 - E. The results of such analyses; and
 - F. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least

Baldor Electric Company - Fort Smith Plant
Permit # 996-AOP-R1 AFIN: 66-00041

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 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 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 C.F.R. 70.6(a)(3)(iii)(B), §26.7 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 occurrence. The initial report may be made by telephone and shall include:
- A. The facility name and location,
 - B. The process unit or emission source which is deviating from the permit limit,
 - C. The permit limit, including the identification of pollutants, from which deviation occurs,
 - D. The date and time the deviation started,
 - E. The duration of the deviation,
 - F. The average emissions during the deviation,
 - G. The probable cause of such deviations,
 - H. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - I. The name of the person submitting the report.

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

Baldor Electric Company - Fort Smith Plant
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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 C.F.R. 70.6(a)(5) and §26.7 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 C.F.R. 70.6(a)(6)(i) and §26.7 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 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 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 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 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.

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15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 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 C.F.R. 70.6(a)(9)(i) and §26.7 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 C.F.R. 70.6(b) and §26.7 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 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 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 C.F.R. 70.6(c)(5) and §26.7 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

Baldor Electric Company - Fort Smith Plant
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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 §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:
- A. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - B. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - C. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - D. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

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APPENDIX B: Monthly Material Usage of Materials BALDOR ELECTRIC COMPANY
- FORT SMITH PLANT

Material	Lacquers & Paints (Gallons)	Lacquer Thinner (Gallons)	Wilko Activator (Gallons)
January 200_			
February 200_			
March 200_			
April 200_			
May 200_			
June 200_			
July 200_			
August 200_			
September 200_			
October 200_			
November 200_			
December 200_			
Total Gallons 12 Month Total			

APPENDIX C: Summary of Throughput Limits

Manufacturer	Products	Total Annual Usage (12 Month Cumulative)	VOC (lb/gal)
Gemini Lacquers Wilko Paint	Lacquers (Various Colors) Paints (Various Colors)	53,742 Gallons Total	6.0 Max.
Wilko Paint	Activator	1,350 Gallons	6.4 Max.
Parker Solvents	Lacquer Thinner	7,980 Gallons	7.0 Max.
Ranbar Electrical Materials	B535-5SH Water Soluble Varnish Concentrate	38,066 Gallons	2.0 Max.

Note: Emissions limits are contingent upon recovery as waste, or through recycling, of 80% of the Lacquer Thinner and 4% of the Paints and Lacquers:

- a) $53,742 \text{ gal/year} \times 0.04 = 2,150 \text{ gallons/year}$
- b) $7,980 \text{ gal/year} \times 0.80 = \underline{6,384 \text{ gallons/year}}$
 $8,534 \text{ gallons/year}$

If usage levels of paints, lacquers and thinners are below 53,188 gallons/12 month period, recovery of paints, lacquers and thinners can be ignored.

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APPENDIX D

APPENDIX B

APPENDIX C

APPENDIX F

Arkansas Department of Pollution Control and Ecology
Division of Air Pollution Control

DETERMINATION OF APPLICABILITY

Name & Location: Baldor Electric Company - Fort Smith Plant

5711 R. S. Boreham Jr. Street, Fort Smith, AR 72901

Contact Name: Mr. Joseph Eigner, Joseph Eigner & Co.

Mailing Address: P. O. Box 208

City Elsah State: IL ZIP: 62028

Process Description: Motors and generators (SIC Code 3621)

CSN :66-0041 Permit No.: 996-AOP-R0 Engineer: Lloyd Davis

Date(s) of DOA Attempts: _____,

Applicable Programs: SIP , PSD , NSPS , NESHAPS , Non-Attainment , Air Code Only , Not Determinable

Pollutant	Existing	Contemp. Decrease	EMISSION SUMMARY TOTALS (TPY)			After
			Contemp. Increase	Net Change	Significant Increase/Permit	
PM/PM ₁₀	<u>30.2</u>	_____	<u>- 21.6</u>	<u>15</u>		<u>8.6</u>
SO ₂	<u>1.0</u>	_____	<u>- 0.5</u>	<u>40</u>		<u>0.5</u>
VOC	<u>165.3</u>	_____	<u>+ 0.6</u>	<u>40</u>		<u>165.9</u>
CO	<u>1.0</u>	_____	<u>- 0.4</u>	<u>100</u>		<u>0.6</u>
NO _x	<u>2.1</u>	_____	<u>+ 1.2</u>	<u>40</u>		<u>3.3</u>
HAPs	<u>NA</u>	_____	<u>+109.7</u>			<u>109.7</u>

Is facility on 28 list (100 TPY)? Yes No Additional Information Required

Facility is "Major Source" before permit? Yes No Facility is "Major Source" after Permit? Yes No

Major modification? Yes No Not applicable Will facility emit toxic emissions? Yes No Is the source with

Yes No If yes, is maximum impact > 1Fg/m³ (24 hr)? Yes No

Is facility located in a non-attainment area? Yes No

For PSD/Non-Attainment Review:

	Monitoring (Fg/m ³ -time)	Ambient Impact (Fg/m ³)	Monitoring Required YES/NO	BACT/LAER
PM/PM ₁₀	_____	_____	_____	_____
SO ₂	_____	_____	_____	_____
VOC	_____	_____	_____	_____
CO	_____	_____	_____	_____
No _x	_____	_____	_____	_____
Other	_____	_____	_____	_____

Limits required on hours of operation, feed rates, etc.? Yes No

Route To: **FELICIA INMAN**
Administration

AIR DIVISION

INVOICE REQUEST FORM

(9-96)

Facility Name & Address:

Baldor Electric Company - Fort Smith Plant
P. O. Box 2400
Fort Smith, Arkansas 72902-2400

CSN: 66-0041

Permit No: 996-AOP-R0

Permit Description:

(e.g. A = AIR CODE, S=SIP, H=NESHAP, P=PSD, N=NSPS, T5= Title V) **T5**

Initial Fee Calculations:

Title V = 3(18.08)(TPY each pollutant, except CO) - amount of last annual air permit fee

NOTE: Do Not double count HAPs and VOCs!!!
No greater than 4000 tpy per pollutant or less than \$1000

Mod Fee Calculations:

Title V = 3 (18.08)(TPY increase of each pollutant, except CO)

NOTE: Do Not double count HAPs and VOCs!!!
No greater than 4000 tpy for each contaminant but not less than \$1000

$F = (18.08)(8.6 + 0.5 + 165.9 + 3.3) = (18.08)(178.3 \text{ tpy}) = \$3,224 - \$2,939$

Fee Amount: \$1,000

Engineer: Lloyd Davis

Date: February 16, 1999

JUSTIFICATION WORKSHEET

Specific Conditions (list applicable specific conditions) were included in Air Permit 996-AOP-R0 to comply with:

1. New Source Performance Standard Subpart _____ NA _____

2. Prevention of Significant Deterioration Regulations

NA

3. NESHAPS

NA

4. Compliance with SIP.

Yes

5. Specific Conditions 1 through 14 were included in this permit to assure compliance with submitted operational descriptions and/or emission limits.

6. National Ambient Air Quality Standards (NAAQS) & Pulaski County Maintenance Regulations.

NA

SIP CHECKLIST

Facility Name: BALDOR ELECTRIC COMPANY - FORT SMITH PLANT

Permit No.: 996-AOP-R0 CSN: 66-0041 Region: _____

ADMINISTRATIVE SECTION

PRIOR TO ROUTING:

COMPLETED

- | | | |
|----|---|-------|
| 1. | Request invoice from Felicia (3 copies) | _____ |
| 2. | Type permit, stamp draft | _____ |
| 3. | Type mailing list | _____ |
| 4. | Type public notice letters to the following: | |
| | a. Applicant - draft and final letters | _____ |
| | b. Newspapers - local and statewide papers | _____ |
| | c. Depository/library - send certified | _____ |
| | d. Mayor | _____ |
| | e. County Judge | _____ |
| 5. | Route file to: Program Coordinator
Testing/CEMS staff
Enforcement
Air Division Chief | _____ |
| 6. | When file comes back to you, check to see if the proof of publication for the receipt of application has been received. | _____ |
| 7. | After corrections have been made and the Chief has signed the draft permit, make 10 copies of the public notice, 6 copies of the mailing list, 1 copy of the letters, type envelopes, and mail. | _____ |
| 8. | Send a copy of the public notice and the mailing list to Rhonda Sharp. | _____ |

9. When the public comment period is up, the fee is paid, and the proofs of publication have been received, route to Air Division Chief for signature. Make 6 copies of the permit and mail. Copies go to Enforcement, Testing/CEMS, Division Chief, and 3 to Permit Engineer (engineer, file, & summary book).

ENGINEERING SIP CHECKLIST

Facility Name: BALDOR ELECTRIC COMPANY - FORT SMITH PLANT

Permit No.: 996-AOP-R0 CSN: 66-0041

Permit Package must contain the following prior to the DRAFT routing.

- _____ Draft Permit
- _____ Proof of publication of receipt of notice of application. Please note that ten (10) days must have elapsed from the date of this notice before a public notice on intent can be published.
- _____ DOA Form
- _____ Fee Worksheet
- _____ Technical Justification Worksheet
- _____ Copy of Plot Plan for Local Inspector

The following must be received and placed in the permit package prior to FINAL routing.

- _____ Proof of publication and payment of notice of intent to issue.
- _____ Fee Payment (Check PFAQ)
- _____ 30 days have elapsed from the time of last publication of the public notice of intent to issue.
- _____ All required attachments are enclosed (i.e. plot plan, area map, etc.)

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (**Regulation #26**) Section 6(b), the Air Division of the Arkansas Department of Pollution Control and Ecology gives the following notice:

Baldor Electric Company, in Fort Smith, Sebastian County, Arkansas, manufactures medium horsepower electric motors (SIC Code 3621) for industrial use. The facility has been operating under air permit 996-AR-1 which limited VOCs to a rate of 165.3 tons/year from its painting operations. This level of emissions requires a Title V application, and the documentation submitted with the application shows that VOCs will eventually be emitted at a rate of 165.9 tons/year; including Hazardous Air Pollutants (HAPs) at 109.7 tpy. Other significant sources of emissions include the combustion of natural gas in burners and ovens, and dust collection equipment.

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

Comment: INSERT THE PUBLIC NOTICE HERE. THIS COMMENT WILL NOT PRINT.

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

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Fort Smith Public Library, 61 South Eighth, Fort Smith, Arkansas 72901. This information may be reviewed during normal business hours.

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

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Randall Mathis

Director

**ARKANSAS DEPARTMENT OF POLLUTION CONTROL & ECOLOGY
AIR DIVISION**

MEMORANDUM

TO: Gordon Burr

FROM: Lloyd Davis

DATE: August 19, 1997

SUBJECT: Baldor Electric, CSN: 66-0041

The General Information page for this application checked off MACT (40 CFR Part 63), but there was no reference to it in the application.

I called up Joseph Eigner, the preparer, and asked about this. He said that he checked it off because there will eventually be some new technology specified for spraying paints.

April 23, 1997

Mr. Joseph Eigner
Joseph Eigner & Company
7024 Tulane Avenue
St. Louis, MO 63130

Reference: Title V Permit Application
CSN: 66-0041

Dear Mr. Eigner:

We are enclosing a print-out of the Screen3 Model run for the SN-A source using an emission rate of 1 lb/hr. The multiple sources have been treated as a single point source with the following characteristics:

	<u>SN-A</u>	<u>SN-01</u>
Average Stack Height	27.2 ft.	30.0 ft
Equivalent Diameter	8.0 ft.	1.5 ft.
Exit Temperature	70°F	325°F
Average Velocity	27.4 ft/sec	35.6 ft/sec

The Emission Calculations have been revised from our previous correspondence, this time using the VOC figures submitted on Page 3 of your calculations, with the particulates reduced by (50%)(15%). All HAP concentrations are now below the allowable concentration at the plant perimeter. Breaking down SN-A into individual sources and running this data through ISCST3 would probably bring the sum of the ratios below 1.0.

At this point we have verified that under worst possible conditions HAP concentrations will not present a health hazard. However, we would like to bring the HAP emissions rate down so that total HAPs do not exceed total VOCs and the source limitations reflect a more accurate accounting of plant emissions. We can do this either by analyzing the compositions of the major paint products or simply assuming that the maximum 229 tpy of VOCs are all HAPs, and the ratio is that given in the Total Emissions table at the bottom of page 3:

Butyl Cellosolve	9%	20.6 tpy
MEK	23%	52.7 tpy
Toluene	32%	73.3 tpy
Xylene	<u>36%</u>	<u>82.4 tpy</u>
	100%	229.0 tpy

The Arkansas fee schedule is the same for HAPs and VOCs, so there may not be any justification for tediously analyzing each paint composition to reduce HAP emissions below the above levels, now that we have established that downwind concentrations are acceptable.

Enclosed is a typical set of specific conditions for a spray booth(s). Your assistance in helping us write the throughput limits for groups of paint products will be appreciated.

If you have any questions, please call me at (501) 682-0733.

Sincerely,

M. Lloyd Davis
Engineer, Air Division

File

December 23, 1998

Mr. Joseph Eigner
Joseph Eigner & Company
7024 Tulane Avenue
St. Louis, MO 63130

Reference: Title V Permit Application
CSN: 66-0041

Dear Mr. Eigner:

Thank you for your letter of December 18, 1998, requesting changes in the above permit application that do not involve significant changes in emissions.

If you have any questions, please call me at (501) 682-0733.

Sincerely,

M. Lloyd Davis
Engineer, Air Division

File

	ORIGIN	SUPERVISOR	SECTION MGR	ASST. DIV. CHIEF	DIV CHIEF
<i>concur</i>	LD				
<i>date</i>	2/11/03				

