

ADEQ

ARKANSAS
Department of Environmental Quality

September 3, 2009

Jose Shores, Corporate Facilities Engineer
Baldor Electric Company
5711 R. S. Boreham Jr. Street
Fort Smith, AR 72901

Re: Notice of Administrative Amendment
AFIN: 66-00041 Permit No.: 0996-AOP-R10

Dear Mr. Shores:

Enclosed is Permit 0996-AOP-R10 completed in accordance with the provisions of Section 26.901 of Regulation No. 26, *Regulations of the Arkansas Operating Air Permit Program*.

The permit was amended in order to correct the date when the active permit expires. This date was wrongly changed with the previous minor modification. The correct date for when the active permit expires is August 23, 2010.

Please place the revised permit in your files.

Sincerely,



Mike Bates
Chief, Air Division

AB
Enclosure: Air Permit

Cc: Rodney Breuer - Fax: (501) 664-5005

ADEQ OPERATING AIR PERMIT

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

Permit No. : 0996-AOP-R10

IS ISSUED TO:

Baldor Electric Company
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:


August 27, 2009

AND

August 23, 2010

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



Mike Bates
Chief, Air Division

September 3, 2009

Date

Baldor Electric Company
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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Baldor Electric Company

AFIN: 66-00041

PERMIT NUMBER: 0996-AOP-R10

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

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

COUNTY: Sebastian County

CONTACT NAME: Jose Shores

CONTACT POSITION: Corporate Facilities Engineer

TELEPHONE NUMBER: 479-649-5211

REVIEWING ENGINEER: Ambrosia Brown

UTM North South (Y): Zone 15: 3910333.05 m

UTM East West (X): Zone 15: 370153.68 m

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SECTION II: INTRODUCTION

Summary of Permit Activity

Baldor Electric Company (AFIN: 66-00041), located at 5711 R. S. Boreham Jr. St. in Fort Smith, AR, manufacturers electric motors for industrial use. This permit is being issued as an administrative amendment in order to correct the date when the active permit expires.

Process Description

Baldor Ft. Smith receives motor components either from other Baldor plants or from vendors. These components include: 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 (SN-A); 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 (SN-20), and the finished rotor receives a primer coating at paint booth (SN-07). 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 (SN-A).

Source #	Bubble Source	Process Description	Current Status
SN-01a	SN-B	Small & Medium Frame Varnish Line Dip Tank	Active
SN-01b	SN-B	Small & Medium Frame Varnish Line Dip Tank	Active
SN-01c	SN-B	Small & Medium Frame Varnish Line Bake Oven	Active
SN-01d	SN-B	Small & Medium Frame Varnish Line Cooling Tunnel	Active
SN-02	SN-A	Spray Painting Booth building #2	Active
SN-03	SN-A	Spray Painting Booth building #2	Active
SN-04		REMOVED	
SN-05	SN-A	Spray Painting Booth building #2	Active

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Source #	Bubble Source	Process Description	Current Status
SN-06	SN-A	Spray Painting Booth building #2	Active
SN-07	SN-A	Spray Painting Booth building #5	Active
SN-08	SN-A	Paint Oven & Cooling Tunnel (building #2)	Active
SN-09	SN-A	Paint Oven & Cooling Tunnel (building #2)	Active
SN-10	SN-A	Paint Oven & Cooling Tunnel (building #2)	Active
SN-11	SN-A	Non-Production Paint Booth (service dept)	Active
SN-12	SN-A	Non-Production Paint Booth (service dept)	Active
SN-13	SN-A	Non-Production Paint Booth (maintenance dept)	Active
SN-14		REMOVED	
SN-15		Wastewater Evaporator	Insignificant
SN-16		Band-base Welder	Insignificant
SN-17		REMOVED	
SN-18		Burn-Off Oven	Insignificant
SN-19		Electric Oven	Insignificant
SN-20		Fan Welder	Insignificant
SN-21	SN-A	Spray Painting Booth building #2	Active
SN-22		End Plate Washer	Insignificant
SN-23		Scrap Recovery Oven	Insignificant
SN-24		Powder Coat Oven	REMOVED
SN-25		Master Ring Heater	Insignificant
SN-26		Aerosol Spray Booth	Insignificant
SN-27	SN-B	37 Frame End Turn Treatment Varnish Line	Active
SN-28	SN-B	Epoxy Encapsulated Curing Oven	Active
SN-29	SN-B	Bay 3 Varnish Operation and Dryer	Active
SN-30	SN-A	Spray Painting Booth	Active
SN-31a	SN-B	Varnish operation and oven – Stack 1	Active
SN-31b	SN-B	Varnish operation and oven – Stack 2	Active
SN-32a	SN-A	Spray Painting Booth	Pending
SN-32b	SN-B	Varnish Operation	Pending

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective January 25, 2009
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective January 25, 2009

Emission Summary

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	0.1	0.6
		PM ₁₀	0.1	0.6
		SO ₂	0.2	0.8
		VOC	180.5	205.6
		CO	0.6	2.5
		NO _x	0.7	3.0
		Total HAPs*	119.0	23.8
		Single HAPs*	119.0	9.5
	Acetone**	119.0	20.0	
A	Spray Painting Operations	VOC	119.0	145.5
		Total HAPs*	119.0	23.8
		Single HAPs*	119.0	9.5
		Acetone**	119.0	20.0
B	Varnish Application and Baking System	PM	0.1	0.6
		PM ₁₀	0.1	0.6
		SO ₂	0.2	0.8
		VOC	61.6	60.1
		CO	0.6	2.5
	NO _x	0.7	3.0	

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

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

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SECTION III: PERMIT HISTORY

The original air permit for the Fort Smith facility of Baldor Electric Company was issued on November 2, 1990. The next 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 were 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. Approximately 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.

0996-AOP-R0 was issued to Baldor Electric Co. on September 23, 1999. This was the initial Title V Operating Air Permit for this existing facility. With this permit, allowable usage of paints increased to 63,140 gal/year and allowable varnish solids usage increased to 290,000 lb/year (dry basis). Overall emissions were quantified at: 8.9 tpy PM/PM₁₀, 1.0 tpy SO₂, 189.3 tpy VOC, 1.0 tpy CO, 3.6 tpy NO_x, 30.9 tpy of diethylene glycol monobutyl ether (DGME), and 145.5 tpy of other volatile hazardous air pollutants (HAPs).

996-AOP-R1 was issued to the facility on February 11, 2003. This modification was issued in order to allow for the continued operation of the SN-06 paint booth, which had been previously removed from the permit by an administrative amendment. There were no changes in emissions or method of operation at the facility from 996-AOP-R0.

966-AOP-R2 was issued to the facility on August 24, 2005. This modification moved sources SN-14, SN-15, SN-18 and SN-23 (former SN-B sources with a total rating of 3.93 MMBTU/hr) to the insignificant activity list. Three diesel-fired electrical generators and the test station for propane powered generator prototypes were also added to the insignificant activities list. VOC and HAP emissions from SN-A and SN-01 were increased to represent worst-case scenario for the facility. PM/PM₁₀ emissions were removed from SN-A. Finally, various small emission changes were made related to changes in emission factors.

966-AOP-R3 was issued November 6, 2006. This modification added an encapsulation room to the insignificant activities list and an additional varnish line that will be bubbled into SN-01 emissions. This modification also removes diethylene glycol monobutyl ether (DGME) emissions from SN-01. DGME will no longer be a constituent of the varnish used for this line. The net result will be an increase in VOC emissions of 16.4 tons per year.

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966-AOP-R4 was issued on December 27, 2006. This modification incorporated the facility's lower use of permitted HAPs thereby allowing the facility to become a minor source of HAP emissions. The facility remained a Title V source due to VOC emissions of 203.1 tons per year. The reduction in the use of permitted HAPs resulted in a decrease of 121.7 tons per year of HAPs. Also SN-B was permitted to use propane as well as natural gas. Finally, the permittee was permitted to use acetone as a HAP-free coating at SN-A.

966-AOP-R5 was issued on August 21, 2007. This modification allowed the facility to raise the annual acetone limit to 20 tons per year, add propane as an allowable fuel in Specific Condition 15, and add language to Specific Conditions 6 and 7 to clarify that compliance with the new lower HAP limits allowed by 996-AOP-R4 started on the effective date of that permit, with the first annual demonstration of compliance to occur 12 months after that date.

996-AOP-R6 was issued on December 26, 2007. The facility requested a modification to allow them to install a varnish application line and a natural gas fired dryer (0.8 MMBtu/hr) to the existing facility. Emissions from these sources were combined with the emissions from SN-B. Permitted VOC emissions increased by 2.4 tons per year.

966-AOP-R7 was issued on August 19, 2008. The facility requested a modification to install one (1) new paint booth (SN-30) to the existing spray painting operations (SN-A). The facility continued to comply with the short term and annual throughput limits contained in the permit. Also, SN-30 is equipped with an electric drying oven listed as an A-13 insignificant activity. The permitted emissions remained unchanged.

966-AOP-R8 was issued March 30, 2009. Baldor requested to add a 35-frame motor varnish dip and brake machine to SN-B. The new line contained a 1.80 MMBTU/hr gas fired oven and two stacks (SN-31a and SN-31b). The hourly PTE increased as a result of the new line; however the annual permitted VOC emissions was included in the current bubble with the exception of the VOC emissions from natural gas combustion. The permitted emissions increased by 0.1 tpy PM/PM₁₀, 0.7 tpy CO, 0.8 tpy NO_x, 0.1 tpy SO₂, and 0.1 tpy VOC as a result of the natural gas combustion of the oven.

966-AOP-R9 was issued August 17, 2009. The facility requested a modification to the current permit in order to add a new motor assembly operation located in Bay 3. The new lines allowed the processing of smaller or more unusual orders that are currently being manufactured on other line, therefore, no changes to short-term or annual emissions were being requested. SN-32a was a part of the SN-A bubble and SN-32b was a part of the SN-B bubble.

SECTION IV: SPECIFIC CONDITIONS

SN-A

Spray Painting Operations (SN-02 through SN-13, SN-30, SN-32a)

Source Description

SN-A is a “bubble” source that includes all of the paint spray booths and the paint ovens for accelerated drying of the coated parts at the facility. Lacquers, paints, activators, and thinners are utilized at these various sources. The individual sources of SN-A include:

- The high volume-low pressure conventional spraying booths, SN-02 through SN-06, and SN-21 in building #2;
- The three electric IR drying ovens associated with the painting operations, which are designated SN-08, SN-09, and SN-10 in building #2;
- 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
- The paint booth SN-07 in building #5 which is used to prime rotors;
- Paint booth SN-13 which is primarily utilized for maintenance projects; and,
- Paint booth SN-30 contained in Bay 3 and fed by conveyor in building #16 is used to paint motors.
- Paint booth SN-32a located in Bay 3 used for small or unusually shaped orders

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #3 and #6. [Regulation 19, §19.501 et seq., effective October 15, 2007 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	119.0	145.5

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #4 and #7. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
Total HAP	119.0	23.8
Single HAP	119.0	9.5
Acetone	119.0	20.0

3. The permittee shall not use any paints or solvents at any source included in SN-A which contain VOC in excess of 7.0 lb/gal. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6]
4. The permittee shall not use any paints or solvents at any source included in SN-A which contain HAPs in excess of the amounts indicated in the following table for the given TLV. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Minimum TLV (mg/m ³)	Maximum HAP Content (lb/gal)
190.4	7.0
171.4	6.3
152.3	5.6
133.2	4.9
114.2	4.2
95.2	3.5
76.1	2.8
57.1	2.1
38.0	1.4
19.0	0.7
9.5	0.35
1.9	0.07

5. The permittee shall maintain MSDS or other records which indicate the VOC and/or HAP content of all paints and solvents in use at the sources which comprise SN-A. MSDS sheets should be updated annually. These records shall be maintained on-site and shall be made available to Department personnel upon request. [§19.705 of Regulation 19 and 40 CFR Part 52 Subpart E and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. The permittee shall maintain monthly records which demonstrate the amount of VOC emitted from the sources included in SN-A. These records shall be maintained in a spreadsheet, database, or other well-organized format. These records shall indicate the amount of each paint or solvent used, the corresponding VOC content of each paint and solvent, and the total amount of VOC emissions from paint and solvent usage. Each individual month's data and a 12-month rolling total shall be maintained on-site, shall be made available to Department personnel upon request, and shall be submitted in accordance with General Provision #7. For compliance with the conditions of this

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permit, records for the 12 month rolling total shall begin on December 27, 2006.
[§19.705 of Regulation 19 and 40 CFR Part 52 Subpart E]

7. The permittee shall maintain monthly records which demonstrate the amount of HAP emitted from the sources included in SN-A. These records shall be maintained in a spreadsheet, database, or other well-organized format. These records shall indicate the amount of each paint or solvent used, the corresponding HAP content of each paint and solvent, and the total amount of HAP emissions from paint and solvent usage. Each individual month's data and a 12-month rolling total shall be maintained on-site, shall be made available to Department personnel upon request, and shall be submitted in accordance with General Provision #7. For compliance with the conditions of this permit, records for the 12 month rolling total shall begin on December 27, 2006. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The maximum allowable production of the spray painting operation SN-32a is 175,200 motors during any consecutive 12 month period. . [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
9. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #8. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]
10. For demonstration of compliance with the conditions of this permit, all calculations, recordkeeping and monitoring of emissions and other data shall be based on defensible data. Defensible data shall consist of sufficient documentation to evaluate the source and relative accuracy of the data. When using data consisting of ranges of values the permittee shall use the worst-case values (resulting in the highest estimated emissions) in calculations or reporting.

The permittee shall demonstrate that the degree of accuracy of the calculations used to determine emissions is sufficient to prove that the permit thresholds (i.e. 9.9/24.9 tpy of individual/combined HAPs) have not been exceeded if actual emissions are calculated at or above 95% of the major threshold. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-B

Varnish Application and Baking System
(SN-01, SN-27&28, SN-31a&b, SN-32b)

Source Description

SN-01 vents solvent emissions from the application of an electrical varnish to the wound magnet wire. Natural gas or propane can be used as fuel in the oven, where dipped motors are baked at 350°F to complete the chemical reaction. The oven is rated at 4.0 MMBtu/hr (SN-01c).

A 35-frame motor varnish dip tank and bake machine along with a 1.80 MMBtu/hr gas fired oven vents to two stacks SN-31a and SN-31b.

SN-32b is an additional 35-frame motor varnish dip tank utilized for small or unusual orders.

Specific Conditions

11. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #10, #12, and #13. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.6
SO ₂	0.2	0.8
VOC	61.6	60.1
CO	0.6	2.5
NO _x	0.7	3.0

12. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #13. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.1	0.6

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13. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9. Compliance with this condition shall be demonstrated by Compliance with Specific Condition #17.

SN	Limit	Regulatory Citation
B	5%	18.501

14. The permittee shall not use any varnish at SN-B which contains VOC in excess of 1.3 lb/gal. [§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]
15. The permittee shall maintain MSDS or other records which demonstrate compliance with the formulation limits found in Specific Conditions #14. These records shall be maintained on-site and shall be made available to Department personnel upon request. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
16. The permittee shall maintain monthly records which demonstrate the amount of VOC emitted from SN-B. These records shall be maintained in a spreadsheet, database, or other well-organized format. These records shall indicate the amount of each varnish used, the corresponding VOC content, and the total amount of VOC emissions from varnish usage. Each individual month's data and a 12-month rolling total shall be maintained on-site, shall be made available to Department personnel upon request, and shall be submitted in accordance with General Provision #7. [§19.705 of Regulation 19 and 40 CFR Part 52 Subpart E]
17. Pipeline-quality natural gas and propane shall be the only fuels combusted at SN-B. [§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]
18. The maximum allowable production of the varnish operation SN-32b is 175,200 motors during any consecutive 12 month period. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
19. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #18. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

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

[Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee must prepare and implement a Startup, Shutdown, and Malfunction Plan (SSM). If the Department requests a review of the SSM, the permittee will make the SSM available for review. The permittee must keep a copy of the SSM at the source's

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location and retain all previous versions of the SSM plan for five years. [Regulation 19, §19.304 and 40 CFR 63.6(e)(3)]

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SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated May 29, 2009.

Description	Category
Welding Stations (SN-16, SN-20)	A-7
Wastewater Evaporator (SN-15R, natural gas-fired, 0.75 MMBtu/hr)	A-1
Endplate Washer (SN-22, water vapor only)	A-13
Burn-Off Oven (SN-18, natural gas-fired, 1.5 MMBtu/hr)	A-1
Electric Oven (SN-19)	A-13
Scrap Recovery Oven (SN-23, natural gas-fired, 0.043 MMBtu/hr)	A-1
Master Ring Heater (SN-25, Electric)	A-1
Aerosol Spray Booth (SN-26)	A-9
Three Emergency Use Diesel-Fired Generators (211 HP each, to be fired no more than 300 hr/yr)	A-1
Epoxy Encapsulation Curing Oven (SN-28)	A-1
Electric Drying Oven (for SN-30)	A-13

SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26)]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will 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. [Regulation 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

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6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below:

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location;
 - ii. The process unit or emission source deviating from the permit limit;
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
 - iv. The date and time the deviation started;
 - v. The duration of the deviation;
 - vi. The average emissions during the deviation;
 - vii. The probable cause of such deviations;
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
 - ix. The name of the person submitting the report.

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

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

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

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14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

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- d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]
- a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
- 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. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
- a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

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[Regulation 18, §18.314(A), Regulation 19, §19.416(A), Regulation 26, §26.1013(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
- a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;
 - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
 - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
 - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), Regulation 26, §26.1013(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), Regulation 26, §26.1013(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]