ADEQ
MINOR SOURCE
AIR PERMIT

Permit #: 1053-AR-6

IS ISSUED TO:

Bekaert Steel Corporation
One Bekaert Drive
Rogers, AR 72756
Benton County
CSN: 04-0291

THIS PERMIT IS YOUR AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND YOUR APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 ET SEQ.) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Keith A. Michaels Date

SECTION I: FACILITY INFORMATION

PERMITTEE:	Bekaert Steel Corporation
CSN:	04-0291
PERMIT NUMBER:	1053-AR-6
FACILITY ADDRESS:	One Bekaert Drive Rogers, AR 72756
COUNTY:	Benton
CONTACT POSITION:	Environmental Coordinator - Rodney Bland
TELEPHONE NUMBER:	(501)631-7661
REVIEWING ENGINEER:	Paul Osmon
UTM North-South (X):	4023.7 km N
UTM East-West (Y):	397.6 km E
	Zone 15

SECTION II: INTRODUCTION

Summary

Bekaert Steel Corporation owns and operates a steel cord manufacturing facility in Rogers. The steel cord is used in the production of steel belted radial tires. Air emissions from this facility include particulate matter, products of combustion, copper, and zinc sulfate.

Air Permit No. 1053-AR-5 was issued to Bekaert Steel Corporation on December 10, 1999. Air Permit No. 1053-AR-5 is being modified under the De Minimis Permit change clause, per permittee's request. The facility currently has 9 OWL lines where diameter reduction on wire is completed by drawing the wire. There are currently dilute hydrochloric acid pickling baths for removal of oxidation products prior to the drawing process on seven (7) of these lines with the emissions controlled by packed tower scrubbers (SN-69, SN-70, SN-71 and SN-90). The facility plans to add dilute hydrochloric acid pickling baths for removal of oxidation products prior to the drawing process on the remaining two OWL lines. Emissions from the dilute hydrochloric acid pickling bath will be controlled by a packed tower scrubber (SN-91). Emission limits for the scrubber will be 0.1 lb/hr and 0.4 tpy of hydrochloric acid.

Process Description

Two processes are currently in use at this facility, the OLW process and the ISC process. These names are used for convenience and do not have any particular meaning. Raw products are initially used in the OLW process. The finished products from the OLW process are stored for later use in the ISC process.

OLW Process

Two ton coils of wire rod are pulled from a payoff hook, one loop at a time, by tension resulting from processes down the line. The continuously fed wire goes through a mechanical descaler where the wire is deformed to break brittle iron oxides loose. Following the descaling process, the wire travels through a hot bath of dissolved material which serves to lubricate the wire for later processes.

The wire is then pulled through a series of die chambers by a number of rotating capstans. Each die chamber contains a small die which is submerged in a dry lubricant. The dies in the series become progressively smaller in size. As the wire is pulled through the die, the lubricant carrier picks up the dry lubricant and reduces the friction in the die area. At each step, the wire diameter

becomes smaller. The wire is wound up onto large spools for storage before being used in the ISC lines.

ISC Process

Each spool of CAZ (CAZ references a dry drawing process) wire will eventually be loaded into a payoff stand for an ISC line. A large number of these spools may be loaded onto the payoff stands at one time, thus forming a continuous stream of horizontally flowing wires. The wires pass through a number of different treatment steps on the ISC process line.

Diameter reduction during the OLW process damages the grains of the wire and changes its mechanical properties. To re-establish these properties, the streams of wires pass through gas fired furnaces set at high enough temperatures so that the carbon in the steel will be reoriented. This reforms the grains lost in the drawing process. After passing through the gas fired furnaces, the wires are quenched in a fluidized bed.

Certain oxides are formed on the wires during the heating process. These oxides are brittle and will pop off if deformed. However, any residue is detrimental to the plating steps later in the process. The oxides are removed by running the wires through a hydrochloric acid bath. Emissions from the hydrochloric baths are controlled through the use of scrubbers. This step cleans the surface and prepares the wires to be coated.

The streams of wires pass through a series of in-line copper pyro-phosphate electroplating baths and rinses in order to put a coating/layer of metal(s) over the steel wire. Wires are picked up by rotating spools. When fully wound, a spool is sent to storage until needed for further processing.

Regulations

The facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Regulation 18) and the regulations of the *Arkansas State Implementation Plan for Air Pollution Control* (Regulation 19).

The following table is a summary of the facility's total emissions.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy

Bekaert Steel Corporation
Permit #: 1053-AR-6
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TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	6.6	26.4
PM_{10}	6.6	26.4
SO_2	2.2	8.8
VOC	2.2	8.8
CO	2.2	8.8
NO_x	3.3	14.3
Cu	0.5	2.0
$ZnSO_4$	0.5	2.0
HCl	1.5	6.0

SECTION III: PERMIT HISTORY

Permit No. 1053-A was issued to Bekaert Corporation on June 4, 1990 for the initial construction of the facility. The permit limits for the original facility were: PM/PM_{10} - 4.2 tpy; NO_x - 49.45 tpy; and HCl - 1.58 tpy.

Permit No. 1053-AR-1 was issued to Bekaert Corporation on November 30, 1992 for a small facility expansion. Permit Limits were PM/PM_{10} - 0.95 tpy; CO -1.08 tpy; NO_x - 5.31 tpy; and HCl - 1.2 tpy.

Permit No. 1053-AR-2 was issued to Bekaert Corporation in 1994. Another small facility expansion occurred on this permit. Permit Limits were PM/PM_{10} - 20.0 tpy; SO_2 - 8.8 tpy; VOC - 8.8 tpy; CO - 8.8 tpy; NO_x - 13.8 tpy; Cu - 1.6 tpy; $ZnSO_4$ - 1.6 tpy; and HCl - 4.4 tpy.

Permit No. 1053-AR-3 was issued to Bekaert Corporation on November 12, 1996. A small plant expansion and modification to the water baths on the ISC line 3 occurred on this permit modification. Permit Limits were PM/PM_{10} - 26.4 tpy; SO_2 - 9.6 tpy; VOC - 9.6 tpy; CO - 9.6 tpy; NO_x - 15.1 tpy; Cu - 2.0 tpy; $ZnSO_4$ - 2.0 tpy; and HCl - 5.6 tpy.

Permit No. 1053-AR-4 was issued to Bekaert Corporation on May 11, 1998. The type of control device used at SN-90 was changed to allow either a packed tower or a plate tower on this permit modification. Permit Limits were PM/PM_{10} - 26.4 tpy; SO_2 - 9.6 tpy; VOC - 9.6 tpy; CO - 9.6 tpy; NO_x - 15.1 tpy; Cu - 2.0 tpy; $ZnSO_4$ - 2.0 tpy; and HCl - 5.6 tpy.

Permit No. 1053-AR-5 was issued to Bekaert Steel Corporation on December 10, 1999. The type of control device used at SN-20 was changed from a sand bed quench unit to a water quench unit on this permit modification. Permit Limits were PM/PM_{10} - 26.4 tpy; SO_2 - 8.8 tpy; VOC - 8.8 tpy; CO - 8.8 tpy; NO_x - 14.3 tpy; Cu - 2.0 tpy; $ZnSO_4$ - 2.0 tpy; and HCl - 5.6 tpy.

SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
01	Natural Gas Furnace, ISC 1	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.2	0.4 0.4 0.4 0.4 0.9
02	Furnace Heat Exchanger Exhaust, ISC 1	Accounted for in SN-01		
03	Fluidized Bed Cooling Exchanger, ISC 1	Accounted for in SN-04		
04	Fluidized Bed, ISC 1 (Natural Gas Fired)	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.1	0.4 0.4 0.4 0.4 0.4
05	Cooling Bath, ISC 1	PM_{10}	0.1	0.4
08	Rinse Separator, ISC 1	PM_{10}	0.1	0.4
09	Ultrasonic Separator, ISC 1	PM_{10}	0.1	0.4
10	Copper Pyro-Phosphate Bath, ISC 1	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.1	0.4 0.4 0.4 0.4 0.4
11	Post Copper Pyro-Phosphate Bath, ISC 1	PM_{10}	0.1	0.4
13	Hot Rinse, ISC 1	PM_{10} SO_2	0.1 0.1	0.4 0.4

SN	Description	Pollutant	lb/hr	tpy
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.1	0.4
14	Cooling Bath, ISC 1	PM_{10}	0.1	0.4
15	Rinse Bath, ISC 1	PM_{10}	0.1	0.4
16	Separator after Hot Rinse, ISC 1	PM_{10}	0.1	0.4
17	Natural Gas Furnace, ISC 2	PM_{10}	0.1	0.4
		SO_2	0.1	0.4
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.2	0.9
18	Furnace Heat Exchanger Exhaust, ISC 2	Accounted for in SN-17		
19	Water Cooling Exchanger, ISC 2	Accounted for in SN-20		
20	Cooling Bath, ISC 2	PM_{10}	0.1	0.4
21	Cooling Bath, ISC 2	PM_{10}	0.1	0.4
24	Rinse Separator, ISC 2	PM_{10}	0.1	0.4
25	Ultrasonic Separator, ISC 2	PM_{10}	0.1	0.4
26	Copper Pyro-Phosphate Bath, ISC 2	PM_{10}	0.1	0.4
		SO_2	0.1	0.4
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.1	0.4
27	Post Copper Pyro-Phosphate Bath, ISC 2	PM_{10}	0.1	0.4
29	Hot Rinse, ISC 2	PM_{10}	0.1	0.4
		SO_2	0.1	0.4
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.1	0.4
30	Cooling Bath, ISC 2	PM_{10}	0.1	0.4

SN	Description	Pollutant	lb/hr	tpy
31	Rinse Bath, ISC 2	PM_{10}	0.1	0.4
32	Separator after Hot Rinse, ISC 2	PM_{10}	0.1	0.4
33	Natural Gas Furnace, ISC 3	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.2	0.4 0.4 0.4 0.4 0.9
34	Furnace Heat Exchanger Exhaust, ISC 3	Accounted for in SN-33		
35	Water Cooling Exchanger, ISC 3	Accounted for in SN-36		
36	Cooling Bath, ISC 3	PM_{10}	0.1	0.4
37	Cooling Bath, ISC 3	PM_{10}	0.1	0.4
40	Rinse Separator, ISC 3	PM_{10}	0.1	0.4
41	Ultrasonic Separator, ISC 3	PM_{10}	0.1	0.4
42	Copper Pyro-Phosphate Bath, ISC 3	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.1	0.4 0.4 0.4 0.4 0.4
43	Post Copper Pyro-Phosphate Bath, ISC 3	PM_{10}	0.1	0.4
45	Hot Rinse, ISC 3	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.1	0.4 0.4 0.4 0.4 0.4
46	Cooling Bath, ISC 3	PM_{10}	0.1	0.4
47	Rinse Bath, ISC 3	PM_{10}	0.1	0.4
48	Separator after Hot Rinse, ISC 3	PM_{10}	0.1	0.4
49	Natural Gas Furnace, ISC 4	PM_{10} SO_2	0.1 0.1	0.4 0.4

SN	Description	Pollutant	lb/hr	tpy
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.2	0.9
50	Furnace Heat Exchanger Exhaust, ISC 4	Accounted for in SN-49		
51	Fluidized Bed Cooling Exchanger, ISC 4	Accounted for in SN-52		
52	Fluidized Bed, ISC 4	PM_{10}	0.1	0.4
		SO_2	0.1	0.4
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.1	0.4
53	Cooling Bath, ISC 4	PM_{10}	0.1	0.4
56	Rinse Separator, ISC 4	PM_{10}	0.1	0.4
57	Ultrasonic Separator, ISC 4	PM_{10}	0.1	0.4
58	Copper Pyro-Phosphate Bath, ISC 4	PM_{10}	0.1	0.4
		SO_2	0.1	0.4
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.1	0.4
59	Post Copper Pyro-Phosphate Bath, ISC 4	PM_{10}	0.1	0.4
61	Hot Rinse after Zinc Sulfate, ISC 4	PM_{10}	0.1	0.4
		SO_2	0.1	0.4
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.1	0.4
62	Cooling Bath, ISC 4	PM_{10}	0.1	0.4
63	Rinse Bath, ISC 4	PM_{10}	0.1	0.4
64	Separator after Hot Rinse, ISC 4	PM_{10}	0.1	0.4
65	Boiler for ISC Lines 1 & 2	PM_{10}	0.1	0.4
		SO_2	0.1	0.4
		VOC	0.1	0.4

SN	Description	Pollutant	lb/hr	tpy
		CO	0.1	0.4
		NO_x	0.1	0.4
66	Boiler for ISC Lines 3 & 4	PM_{10}	0.1	0.4
		SO_2	0.1	0.4
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.2	0.9
67	2 Boilers for CAZ Area	PM_{10}	0.1	0.4
		SO_2	0.1	0.4
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.2	0.9
68	Dust Collector for CAZ Machines	PM_{10}	0.4	1.6
72	Water “Quench” Cooling Bath, ISC 3	PM_{10}	0.1	0.4
73	Natural Gas Furnace, ISC 5	PM_{10}	0.1	0.4
		SO_2	0.1	0.4
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.2	0.9
74	Water “Quench” Cooling Bath, ISC 5	PM_{10}	0.1	0.4
75	Cooling Bath, ISC 5	PM_{10}	0.1	0.4
78	Rinse Separator, ISC 5	PM_{10}	0.1	0.4
79	Ultrasonic separator, ISC 5	PM_{10}	0.1	0.4
80	Copper Pyro-Phosphate Bath, ISC 5	PM_{10}	0.1	0.4
		SO_2	0.1	0.4
		VOC	0.1	0.4
		CO	0.1	0.4
		NO_x	0.1	0.4
81	Post Copper Pyro-Phosphate Bath, ISC 5	PM_{10}	0.1	0.4
83	Hot Rinse, ISC 5	PM_{10}	0.1	0.4
		SO_2	0.1	0.4

SN	Description	Pollutant	lb/hr	tpy
		VOC CO NO_x	0.1 0.1 0.1	0.4 0.4 0.4
84	Cooling Bath, ISC 5	PM_{10}	0.1	0.4
85	Rinse Bath, ISC 5	PM_{10}	0.1	0.4
86	Separator after Hot Rinse, ISC 5	PM_{10}	0.1	0.4
87	Boiler for ISC 5	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.2	0.4 0.4 0.4 0.4 0.9
88	Boiler for CAZ Area	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.2	0.4 0.4 0.4 0.4 0.9
89	Filtrex Dust Collector for OLW Lines 8, 9, & 10	PM_{10}	0.1	0.4

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

SN	Description	Pollutant	lb/hr	tpy
01	Natural Gas Furnace, ISC 1	PM	0.1	0.4
02	Furnace Heat Exchanger Exhaust, ISC 1	Accounted for in SN-01		
03	Fluidized Bed Cooling Exchanger, ISC 1	Accounted for in SN-04		

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SN	Description	Pollutant	lb/hr	tpy
04	Fluidized Bed, ISC 1 (Natural Gas Fired)	PM	0.1	0.4
05	Cooling Bath, ISC 1	PM	0.1	0.4
06	Head Discharge for HCl Pickling Baths, ISC 1	HCl	0.1	0.4
07	Rinsing Bath after HCl ISC 1	HCl	0.1	0.4
08	Rinse Separator, ISC 1	PM	0.1	0.4
09	Ultrasonic Separator, ISC 1	PM	0.1	0.4
10	Copper Pyro-Phosphate Bath, ISC 1	PM	0.1	0.4
11	Post Copper Pyro-Phosphate Bath, ISC 1	PM Cu	0.1 0.1	0.4 0.4
12	Post Zinc Sulphate Rinse, ISC 1	$ZnSO_4$	0.1	0.4
13	Hot Rinse, ISC 1	PM	0.1	0.4
14	Cooling Bath, ISC 1	PM	0.1	0.4
15	Rinse Bath, ISC 1	PM	0.1	0.4
16	Separator after Hot Rinse, ISC 1	PM	0.1	0.4
17	Natural Gas Furnace, ISC 2	PM	0.1	0.4
18	Furnace Heat Exchanger Exhaust, ISC 2	Accounted for in SN-17		
19	Water Cooling	Accounted for in SN-20		

SN	Description	Pollutant	lb/hr	tpy
	Exchanger, ISC 2			
20	Cooling Bath, ISC 2	PM	0.1	0.4
21	Cooling Bath, ISC 2	PM	0.1	0.4
22	Head Discharge for HCl Pickling Baths, ISC 2	HCl	0.1	0.4
23	Rinsing Bath after HCl ISC 2	HCl	0.1	0.4
24	Rinse Separator, ISC 2	PM	0.1	0.4
25	Ultrasonic Separator, ISC 2	PM	0.1	0.4
26	Copper Pyro-Phosphate Bath, ISC 2	PM Cu	0.1 0.1	0.4 0.4
27	Post Copper Pyro-Phosphate Bath, ISC 2	PM	0.1	0.4
28	Post Zinc Sulphate Rinse, ISC 2	$ZnSO_4$	0.1	0.4
29	Hot Rinse, ISC 2	PM	0.1	0.4
30	Cooling Bath, ISC 2	PM	0.1	0.4
31	Rinse Bath, ISC 2	PM	0.1	0.4
32	Separator after Hot Rinse, ISC 2	PM	0.1	0.4
33	Natural Gas Furnace, ISC 3	PM	0.1	0.4
34	Furnace Heat Exchanger Exhaust, ISC 3	Accounted for in SN-33		
35	Water Cooling	Accounted for in SN-36		

SN	Description	Pollutant	lb/hr	tpy
	Exchanger, ISC 3			
36	Cooling Bath, ISC 3	PM	0.1	0.4
37	Cooling Bath, ISC 3	PM	0.1	0.4
38	Head Discharge for HCl Pickling Baths, ISC 3	HCl	0.1	0.4
39	Rinsing Bath after HCl Pickling, ISC 3	HCl	0.1	0.4
40	Rinse Separator, ISC 3	PM	0.1	0.4
41	Ultrasonic Separator, ISC 3	PM	0.1	0.4
42	Copper Pyro-Phosphate Bath, ISC 3	PM Cu	0.1 0.1	0.4 0.4
43	Post Copper Pyro-Phosphate Bath, ISC 3	PM	0.1	0.4
44	Post Zinc Sulphate Rinse, ISC 3	$ZnSO_4$	0.1	0.4
45	Hot Rinse, ISC 3	PM	0.1	0.4
46	Cooling Bath, ISC 3	PM	0.1	0.4
47	Rinse Bath, ISC 3	PM	0.1	0.4
48	Separator after Hot Rinse, ISC 3	PM	0.1	0.4
49	Natural Gas Furnace, ISC 4	PM	0.1	0.4
50	Furnace Heat Exchanger Exhaust, ISC 4	Accounted for in SN-49		
51	Fluidized Bed Cooling	Accounted for in SN-52		

SN	Description	Pollutant	lb/hr	tpy
	Exchanger, ISC 4			
52	Fluidized Bed, ISC 4	PM	0.1	0.4
53	Cooling Bath, ISC 4	PM	0.1	0.4
54	Head Discharge for HCl Pickling Baths, ISC 4	HCl	0.1	0.4
55	Head Discharge for Rinsing Bath after HCl Pickling Bath, ISC 4	HCl	0.1	0.4
56	Rinse Separator, ISC 4	PM	0.1	0.4
57	Ultrasonic Separator, ISC 4	PM	0.1	0.4
58	Copper Pyro-Phosphate Bath, ISC 4	PM Cu	0.1 0.1	0.4 0.4
59	Post Copper Pyro-Phosphate Bath, ISC 4	PM	0.1	0.4
60	Post Zinc Sulphate Rinse, ISC 4	$ZnSO_4$	0.1	0.4
61	Hot Rinse after Zinc Sulfate, ISC 4	PM	0.1	0.4
62	Cooling Bath, ISC 4	PM	0.1	0.4
63	Rinse Bath, ISC 4	PM	0.1	0.4
64	Separator after Hot Rinse, ISC 4	PM	0.1	0.4
65	Boiler for ISC Lines 1 & 2	PM	0.1	0.4
	Boiler for ISC Lines 3			

SN	Description	Pollutant	lb/hr	tpy
66	& 4	PM	0.1	0.4
67	2 Boilers for CAZ Area	PM	0.1	0.4
68	Dust Collector for CAZ Machines	PM	0.4	1.6
69	Discharge for HCl Pickling Bath, OLW Lines 3 & 4	HCl	0.1	0.4
70	Discharge for HCl Pickling Bath, OLW Lines 6 & 7	HCl	0.1	0.4
71	Discharge for HCl Pickling Bath, OLW Line 5	HCl	0.1	0.4
72	Water “Quench” Cooling Bath, ISC 3	PM	0.1	0.4
73	Natural Gas Furnace, ISC 5	PM	0.1	0.4
74	Water “Quench” Cooling Bath, ISC 5	PM	0.1	0.4
75	Cooling Bath, ISC 5	PM	0.1	0.4
76	Head Discharge for HCl Pickling Baths, ISC 5	HCl	0.1	0.4
77	Rinsing Bath after HCl Pickling, ISC 5	HCl	0.1	0.4
78	Rinse Separator, ISC 5	PM	0.1	0.4
79	Ultrasonic separator, ISC 5	PM	0.1	0.4
80	Copper Pyro-	PM	0.1	0.4

SN	Description	Pollutant	lb/hr	tpy
	Phosphate Bath, ISC 5	Cu	0.1	0.4
81	Post Copper Pyro-Phosphate Bath, ISC 5	PM	0.1	0.4
82	Post Zinc Sulphate Rinse, ISC 5	$ZnSO_4$	0.1	0.4
83	Hot Rinse, ISC 5	PM	0.1	0.4
84	Cooling Bath, ISC 5	PM	0.1	0.4
85	Rinse Bath, ISC 5	PM	0.1	0.4
86	Separator after Hot Rinse, ISC 5	PM	0.1	0.4
87	Boiler for ISC 5	PM	0.1	0.4
88	Boiler for CAZ Area	PM	0.1	0.4
89	Filtrex Dust Collector for OLW Lines 8, 9, & 10	PM	0.1	0.4
90	Pickling Bath - OLW Lines 1 & 2	HCl	0.1	0.1
91	Pickling Bath - OLW Lines 8 & 9	HCl	0.1	0.4

3. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
01, 04, 06, 07, 13, 17, 22, 23, 26, 29, 33, 38, 39, 42, 45, 49, 52, 54, 55, 58, 61, 65, 66, 67, 68, 69, 70, 71, 72, 73, 76, 77,	5%	§18.501

SN 80, 83, 87, 88, 89, 90, 91	Limit	Regulatory Citation
05, 08, 09, 10, 11, 12, 14, 15, 16, 20, 21, 24, 25, 27, 28, 30, 31, 32, 36, 37, 40, 41, 43, 44, 46, 47, 48, 53, 56, 57, 59, 60, 62, 63, 64, 74, 75, 78, 79, 81, 82, 84, 85, 86	0%	§18.501

4. 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 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.

5. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.

6. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, pipeline quality natural gas shall be the only fuel used at this facility. As all natural gas fired sources are permitted at capacity, no records are required to be kept concerning natural gas usage.

7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee may operate the facility for 8,760 hours per year. As the emissions are all based upon the facility running at capacity full time, no records are required to be kept.

SECTION V: INSIGNIFICANT ACTIVITIES

The following types of activities or emissions are deemed insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated March 14, 2001.

Description	Category
None Listed	

SECTION VI: GENERAL CONDITIONS

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.

2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.

3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department 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.

4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.

5. Pursuant to §19.705 of Regulation 19 and/or §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, records must be kept for five years which will enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

6. Pursuant to §19.705 of Regulation 19 and/or §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, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

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

7. 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.

8. 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

9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 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.

10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met:

    a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and that all reasonable measures have been taken to immediately minimize or eliminate the excess emissions.
    b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
    c. The permittee shall submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, it need not be submitted again.

11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:

    a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit
    b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act
    c. To inspect any monitoring equipment or monitoring method required in this permit
    d. To sample any emission of pollutants
    e. To perform an operation and maintenance inspection of the permitted source

12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus.

13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.

14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.

15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.

16. 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.

17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.