

ADEQ

ARKANSAS
Department of Environmental Quality

May 19, 2008

Rodney Bland
Environmental Coordinator
Bekaert Steel Corporation
One Bekaert Drive
Rogers, Arkansas 72756

Re: Notice of Administrative Amendment
AFIN: 04-00291 - Permit No.: 1053-AR-7

Dear Mr. Bland:

Enclosed is revised Permit 1053-AR-7 completed in accordance with the provisions of Section 19.407 of Regulation No. 19, *Regulations of the Arkansas Plan of Implementation for Air Pollution Control*.

The physical rearrangement and modification of ductwork has been approved. No additional emissions are anticipated from this change. In addition, the descriptions of several sources have been renamed.

Please place the revised permit in your files. If you have any questions or comments, please contact Patty Campbell, Engineer, at (479) 267-0811 ext. 19 or ADEQ Air Division - Permit Branch at (501) 682-0767.

Sincerely,



Mike Bates
Chief, Air Division

pc
Enclosure

ADEQ MINOR SOURCE AIR PERMIT

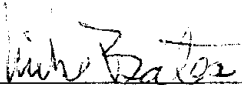
Permit #: 1053-AR-7

IS ISSUED TO:

Bekaert Steel Corporation
One Bekaert Drive
Rogers, AR 72756
Benton County
AFIN: 04-00291

THIS PERMIT IS BEKAERT STEEL CORPORATION'S 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 THE 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:



Mike Bates
Chief, Air Division

May 19, 2008

Date Amended

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Bekaert Steel Corporation

Permit #: 1053-AR-7

AFIN: 04-00291

Section I: FACILITY INFORMATION

PERMITTEE: Bekaert Steel Corporation

AFIN: 04-00219

PERMIT NUMBER: 1053-AR-7

FACILITY ADDRESS: One Bekaert Drive
Rogers, AR 72756

COUNTY: Benton

CONTACT PERSON: Rodney Bland

CONTACT POSITION: Environmental Coordinator

TELEPHONE NUMBER: (479) 621-7529

REVIEWING ENGINEER: Paul Osmon

UTM North-South (Y): Zone 15, 4023.7 km N

UTM East-West (X): Zone 15, 397.6 km E

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Section II: INTRODUCTION

Summary

Bekaert Steel Corporation owns and operates a steel cord manufacturing facility (NAICS 314992) located at One Bekaert Drive, Rogers, Benton County, Arkansas 72756 (AFIN: 04-00291). 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.

This modification is issued to change Air Permit No. 1053-AR-6 under the De Minimis Permit change clause, per permittee's request. The facility currently has 9 dilute hydrochloric acid baths which are used to remove residual oxides from the wire rod prior to processing. The facility proposes to add a 10th bath. There currently are 5 scrubbers listed in the permit which control the emissions from these acid baths. Four of the baths currently control 2 acid baths and the other controls only one bath. The new bath will be added to the scrubber which currently controls only one bath. There will be no change in emission limits.

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.

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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).

Total Allowable Emissions

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

Table 1 - Total Allowable Emissions

Total Allowable Emissions		
Pollutant	Emissions 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

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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/PM₁₀ - 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/PM₁₀ - 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/PM₁₀ - 20.0 tpy; SO₂ - 8.8 tpy; VOC - 8.8 tpy; CO - 8.8 tpy; NO_x - 13.8 tpy; Cu - 1.6 tpy; ZnSO₄ - 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/PM₁₀ - 26.4 tpy; SO₂ - 9.6 tpy; VOC - 9.6 tpy; CO - 9.6 tpy; NO_x - 15.1 tpy; Cu - 2.0 tpy; ZnSO₄ - 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/PM₁₀ - 26.4 tpy; SO₂ - 9.6 tpy; VOC - 9.6 tpy; CO - 9.6 tpy; NO_x - 15.1 tpy; Cu - 2.0 tpy; ZnSO₄ - 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/PM₁₀ - 26.4 tpy; SO₂ - 8.8 tpy; VOC - 8.8 tpy; CO - 8.8 tpy; NO_x - 14.3 tpy; Cu - 2.0 tpy; ZnSO₄ - 2.0 tpy; and HCl - 5.6 tpy.

Permit No. 1053-AR-6 was issued to Bekaert Steel Corporation on June 21, 2001. The facility added dilute hydrochloric acid pickling baths for removal of oxidation products prior to the drawing process on the remaining two OLW lines. Permit Limits were PM/PM₁₀ - 26.4 tpy; SO₂ - 8.8 tpy; VOC - 8.8 tpy; CO - 8.8 tpy; NO_x - 14.3 tpy; Cu - 2.0 tpy; ZnSO₄ - 2.0 tpy; and HCl - 6.0 tpy.

Permit No. 1053-AR-7 was issued on November 17, 2004. The facility proposed adding a new (tenth) dilute hydrochloric acid bath. The new bath was added to a scrubber which controlled only one other bath. There was no change in emission limits.

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Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee will not exceed the emission rates set forth in the following table. [§19.501 *et seq.* of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective October 15, 2007 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 2 - Criteria Pollutants

SN	Description	Pollutant	lb/hr	Tpy
01	Natural Gas Furnace, ISC 1	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
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	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
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	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
11	Post Copper Pyro-Phosphate Bath, ISC 1	PM ₁₀	0.1	0.4
13	Hot Rinse, ISC 1	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

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SN	Description	Pollutant	lb/hr	Tpy
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
31	Rinse Bath, ISC 2	PM ₁₀	0.1	0.4
32	Separator after Hot Rinse, ISC 2	PM ₁₀	0.1	0.4

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SN	Description	Pollutant	lb/hr	Tpy
33	Natural Gas Furnace, ISC 3	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
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	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
43	Post Copper Pyro-Phosphate Bath, ISC 3	PM ₁₀	0.1	0.4
45	Hot Rinse, ISC 3	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
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	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
50	Furnace Heat Exchanger Exhaust, ISC 4	Accounted for in SN-49		
51	Fluidized Bed Cooling Exchanger, ISC 4	Accounted for in SN-52		

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SN	Description	Pollutant	lb/hr	Tpy
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
		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

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SN	Description	Pollutant	lb/hr	Tpy
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
		VOC	0.1	0.4
		CO	0.1	0.4
		NO _x	0.1	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

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SN	Description	Pollutant	lb/hr	Tpy
87	Boiler for 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
88	Boiler 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
89	Filtrex Dust Collector for OLW Lines 8, 9, & 10	PM ₁₀	0.1	0.4

2. The permittee will not exceed the emission rates set forth in the following table. [§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]

Table 3 - Non-Criteria Pollutants

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		
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

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SN	Description	Pollutant	lb/hr	tpy
11	Post Copper Pyro-Phosphate Bath, ISC 1	PM	0.1	0.4
		Cu	0.1	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 Exchanger, ISC 2	Accounted for in SN-20		
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	0.1	0.4
		Cu	0.1	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

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SN	Description	Pollutant	lb/hr	tpy
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	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 Exchanger, ISC 4	Accounted for in SN-52		
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

SN	Description	Pollutant	lb/hr	tpy
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
66	Boiler for ISC Lines 3 & 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 7 & 8	HCl	0.1	0.4
71	Discharge for HCl Pickling Bath, OLW Line 5 and 6	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

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SN	Description	Pollutant	lb/hr	tpy
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-Phosphate Bath, ISC 5	PM Cu	0.1 0.1	0.4 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 9 & 10	HCl	0.1	0.4

3. Visible emissions will not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 4 - Visible Emissions

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, 80, 83, 87, 88, 89, 90, 91	5%	§18.501

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SN	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. The permittee will 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. [§18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]
5. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
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.

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as 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 September 2, 2004 and amendment dated April 28, 2008.

Table 5 - Insignificant Activities

Description	Category
Spool touch up painting process	Group A No. 13

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that 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 that 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. This permit does 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 under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [§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]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [§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]
5. The permittee must keep records for five years to 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 Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [§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]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [§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]

Bekaert Steel Corporation
Permit #: 1053-AR-7
AFIN: 04-00291

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

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or 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) existing equipment already operating according to the time frames set forth by the Department. 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 must submit compliance test results to the Department within thirty (30) days after the completion of testing. [§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]
8. The permittee will provide: [§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]
 - 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. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [§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]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will 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: [§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]
 - 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 the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.

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- 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 must 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, the information need not be submitted again.
11. The permittee will allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - 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; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit 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. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [§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]
14. This permit may be transferred. An applicant for a transfer must 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. The Department may deny a transfer on the basis of the

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information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [§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]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]