

OPERATING AIR PERMIT

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

Permit #: 1331-AOP-R1

IS ISSUED TO:

Arkansas Poly, Inc.
1248 South 28th Street
Van Buren, AR 72956
Crawford County
CSN: 17-0100

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:

February 9, 1998

and

February 8, 2003

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE: Arkansas Poly, Inc.
CSN: 17-0100
PERMIT NUMBER: 1331-AOP-R1
FACILITY ADDRESS: 1248 South 28th Street
Van Buren, AR 72956
COUNTY: Crawford
CONTACT POSITION: David Webb - Plant Engineer
TELEPHONE NUMBER: (501)474-5036
REVIEWING ENGINEER: Paul Osmon
Latitude North-South (X): 35° 25' 05"
Longitude East-West (Y): 94° 19' 55"

SECTION II: INTRODUCTION

Arkansas Poly, Inc. is a manufacturer of printed and unprinted polyethylene film and bags. The polyethylene resin pellets are pneumatically conveyed to a feed hopper mounted at the throat of a extruder machine. The extruder heats the polyethylene pellets to a drawable consistency then forces it through a circular die where it is formed into a tubular shape. The polyethylene film is cooled, collapsed, and wound on to a roll. Polyethylene film is shipped direct to customers as a finished product, sent to the printing department, or sent to the bag department where film is heat sealed into individual bags.

Permit #1331-AOP-R1 is the the first revision to the operating permit issued to Arkansas Poly, Inc. under Regulation 26. The facility proposes to move the In-line printer (SN-07) to a new location in the facility and to install a rebuilt 4 color press (SN-10, SN-08 and SN-09) where it was previously installed. The previous PAL of 247 tpy VOC from ink emissions will not be increased. The PAL for methanol will increase to 4.4 tpy (0.8 tpy increase) and the PAL for methyl isobutyl ketone will increase to 2.7 tpy (0.4 tpy increase). A summary of emissions from this facility can be found in the table below..

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM/PM ₁₀	0.5	2.4	
		SO ₂	0.5	2.4	
		VOC	83.1	249.4	
		CO	0.5	2.4	
		NO _x	0.5	2.4	

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Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
01	Six Color Flexographic Printing Press #1	VOC	25.0	*	8
		HAPs			
		Methanol	0.3	*	
		Methyl Isobutyl Ketone	0.2	*	
02	Press Dryer - Color #1	PM/PM ₁₀	0.1	0.4	12
		SO ₂	0.1	0.4	
		VOC	0.1	0.4	
		CO	0.1	0.4	
		NO _x	0.1	0.4	
03	Press Dryer - Main Tunnel #1	PM/PM ₁₀	0.1	0.4	12
		SO ₂	0.1	0.4	
		VOC	0.1	0.4	
		CO	0.1	0.4	
		NO _x	0.1	0.4	
04	Six Color Flexographic Printing Press #2	VOC	39.3	*	8
		HAPs			
		Methanol	0.4	*	
		Methyl Isobutyl Ketone	0.2	*	
05	Press Dryer - Color #2	PM/PM ₁₀	0.1	0.4	12
		SO ₂	0.1	0.4	
		VOC	0.1	0.4	
		CO	0.1	0.4	
		NO _x	0.1	0.4	

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
06	Press Dryer - Main Tunnel #2	PM/PM ₁₀	0.1	0.4	12
		SO ₂	0.1	0.4	
		VOC	0.1	0.4	
		CO	0.1	0.4	
		NO _x	0.1	0.4	
07	One Color In-Line Printer	VOC	0.5	*	8
		HAPs			
		Methanol			
		Methyl	0.1	*	
		Isobutyl Ketone	0.1	*	
08	Press Dryer - Color #2	PM/PM ₁₀	0.1	0.4	12
		SO ₂	0.1	0.4	
		VOC	0.1	0.4	
		CO	0.1	0.4	
		NO _x	0.1	0.4	
09	Press Dryer - Main Tunnel #2	PM/PM ₁₀	0.1	0.4	12
		SO ₂	0.1	0.4	
		VOC	0.1	0.4	
		CO	0.1	0.4	
		NO _x	0.1	0.4	
10	Four Color Flexographic Printing Press #3	VOC	17.9	*	8
		HAPs			
		Methanol	0.2	*	
		Methyl	0.1	*	
		Isobutyl Ketone			

* - The ton per year limits will be verified by specific conditions 2, 6, and 7. This will bubble sources 1, 4, 7, and 10 to establish a PAL for VOCs, methanol, Methyl Isobutyl Ketone.

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SECTION III: PERMIT HISTORY

The first permit, #1331-A, was issued under Arkansas Regulation 19 on August 3, 1992.

Permit #1331-AR-1, which was issued on December 7, 1992, allow an increase in VOC emissions of 28 tons per year.

Permit #1331-AR-2 was issued on January 25, 1994. This permitting action included the installation of a new six color flexographic printing press.

Permit #1331-AR-3 was issued on May 5, 1995. This permitting action included adding a second flexographic printing press, two natural gas fired dryers, and a new color in-line printer.

Permit #1331-AOP-R0 was issued on February 9, 1998 . This was the first permit issued to the facility under Regulation 26. There were no changes in the operations at the facility from the previous permit.

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SECTION IV: EMISSION UNIT INFORMATION

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SN-#01, SN-04, SN-07, and SN-10
Printing Department

Source Description

Rolls of unprinted polyethylene are routed through three different printing presses (SN-01, SN-04 and SN-10) and rewound on the other end. Press No. 1 (SN-01) and No. 2 (SN-04) can apply up to six colors to the surface of the film and Press No. 3 (SN-10) can apply up to four colors to the surface of the film.

Some customers require warning labels on their bags or rolls. Such labeling cannot be done on the printing press, so a small in-line printer (SN-07) imprints a small label on the polyethylene film.

Specific Conditions

1. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The pound per hour emission rates are based on maximum capacity and compliance with the ton per year limits will be verified by specific conditions 2, 6, and 7.

SN-#	Description	Pollutant	lb/hr	tpy
01	Six Color Flexographic Printing Press #1	VOC	25.0	*
04	Six Color Flexographic Printing Press #2	VOC	40.0	*
07	One Color In-Line Printer	VOC	0.5	*

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SN-#	Description	Pollutant	lb/hr	tpy
10	Four Color Flexographic Printing Press #3	VOC	17.9	*

2. Pursuant to §19.5 of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52 Subpart E, the permittee shall not use in excess of 247.0 tons per year of VOCs for any twelve consecutive months from the inks used in the printing presses .
3. Pursuant to §19.7 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set in Specific Condition 2 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.
4. Pursuant to 40 CFR Part 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry, the permittee chooses to commit to and meets the following criteria stated in 40 CFR 63.820, paragraph (a)(2).

40 CFR 63.820 Applicability

(a) The provisions of this subpart apply to:

(2) each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to, and meets the criteria of paragraphs (a)(2)(i) and (a)(2)(ii) of this section for purposes of establishing the facility to be an area source with respect to this subpart:

(i) Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and

(ii) Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

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40 CFR 63.829 Recordkeeping requirements.

(d) The owner or operator of each facility which commits to the criteria of §63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

40 CFR 63.830 Reporting requirements.

(b) Each owner or operator of an affected source subject to this subpart shall submit the reports specified in paragraphs (b)(1) through (b)(6) of this section to the Administrator:

(1) An initial notification required in § 63.9(b).

(i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in § 63.826(a).

(ii) Initial notifications for new and reconstructed sources shall be submitted as required by § 63.9(b).

(iii) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under § 63.9(b), provided the same information is contained in the permit application as required by § 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

(iv) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.

5. Pursuant to §18.8 of the Arkansas Air Pollution Control Code, effective July 1, 1997 (Regulation 18), the permittee shall not exceed the HAP emission rates set forth in the following table.

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SN-#	Description	Pollutant	lb/hr	tpy
01	Six Color Flexographic Printing Press #1	Methanol Methyl Isobutyl Ketone	0.3 0.2	* *
04	Six Color Flexographic Printing Press #2	Methanol Methyl Isobutyl Ketone	0.4 0.2	* *
07	One Color In-Line Printer	Methanol Methyl Isobutyl Ketone	0.1 0.1	* *
10	Four Color Flexographic Printing Press #3	Methanol Methyl Isobutyl Ketone	0.2 0.1	* *

6. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed 4.4 tons per year of methanol for any twelve consecutive months.
7. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall not exceed 2.7 tons per year of methyl isobutyl ketone for any twelve consecutive months.
8. Pursuant to §18.10 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 maintain records which demonstrate compliance with the limits set in Specific Conditions 6 and 7 and may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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SN-#02, SN-03, SN-05, SN-06, SN-08 and SN-09
 Dryers Department

Source Description

Between each color, a natural gas-fired dryer (SN-02, SN-05 and SN-08) applies heated air to dry the surface before the next color is applied. After the final coating is applied, the film passes through the main drying tunnel (SN-03, SN-06, and SN-09) where the remaining ink is dried, before the film is rewound on a roll and sent to the customer. Emissions from the following sources are from natural gas burning.

Specific Conditions

9. Pursuant to §19.5 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective July 1, 1997 (Regulation 19) and 40 CFR Part 52, Supart E, the permittee shall not exceed the emission rates set forth in the following table. The pound per hour and ton per year emission rates are based on maximum capacity.

SN-#	Description	Pollutant	lb/hr	tpy
02	Press Dryer - Color #1	PM/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
03	Press Dryer - Main Tunnel #1	PM/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	Press Dryer - Color #2	PM/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
06	Press Dryer - Main Tunnel #2	PM/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
08	Press Dryer - Color #3	PM/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
09	Press Dryer - Main Tunnel #3	PM/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

10. Pursuant to §18.5 of Regulation 18, the opacity shall not exceed 5% from the press color dryers and press main tunnel dryers (SN-02, SN-03, SN-05, SN-06, SN-08, and SN-09). The permittee will show compliance by burning only natural gas.

SECTION V: PLANTWIDE CONDITIONS

1. Pursuant to §19.4(o) of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.4(q) of Regulation 19, and 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.7 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein 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. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Two copies of the compliance test results shall be submitted to the Department within thirty (30) days after the completed testing. The permittee shall provide:
 - (1) Sampling ports adequate for applicable test methods
 - (2) Safe sampling platforms
 - (3) Safe access to sampling platforms
 - (4) Utilities for sampling and testing equipment
4. Pursuant to Regulation 19.3 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.
5. 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.
6. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants from becoming airborne.

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7. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

SECTION VI: *DE MINIMIS* EMISSION SOURCES

Pursuant to §26.3(d) of Regulation 26, the following sources are below the *de minimis* emission levels. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not *de minimis*, even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. *De minimis* emission determinations rely upon the information submitted by the permittee in an application dated July 29, 1998.

No insignificant activities were identified in this permit.

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be below the *de minimis* emission levels. Activities included in this list are allowable under this permit and need not be specifically identified.

1. Natural gas-burning equipment with a design rate less than 1 million BTU per hour.
2. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.
3. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
4. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.
5. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
6. Consumer use of office equipment and products, not including commercial printers or businesses primarily involved in photographic reproduction.
7. Janitorial services and consumer use of janitorial products.

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8. Internal combustion engines used for landscaping purposes.
9. Laundry activities, except for dry-cleaning and steam boilers.
10. Bathroom/toilet emissions.
11. Emergency (backup) electrical generators at residential locations.
12. Tobacco smoking rooms and areas.
13. Blacksmith forges.
14. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
15. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.¹
16. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface coating or products.
17. Portable electrical generators that can be "moved by hand" from one location to another.²
18. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.

¹ Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

²"Moved by hand" means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

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19. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.³
20. Air compressors and pneumatically operated equipment, including hand tools.
21. Batteries and battery charging stations, except at battery manufacturing plants.
22. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.⁴
23. Containers of less than or equal to 5 gallons in capacity that do not emit any detectable VOCs or HAPs when closed. This includes filling, blending, or mixing of the contents of such containers by a retailer.
24. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
25. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solution, provided appropriate lids and covers are used and appropriate odor control is achieved.
26. Drop hammers or presses for forging or metalworking.
27. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
28. Vents from continuous emission monitors and other analyzers.
29. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

³Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately.

⁴Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

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30. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.
31. Equipment used for surface coating, painting, dipping, or spraying operations, containing less than 0.4 lb/gal VOCs, has no hexavalent chromium, and emits no more than 0.1 tpy of all other HAPs.
32. Lasers used only on metals and other materials which do not emit HAPs in the process.
33. Consumer use of paper trimmers/binders.
34. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boiler delivering the steam.
35. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
36. Laser trimmers using dust collection to prevent fugitive emissions.
37. Bench-scale laboratory equipment used for physical or chemical analysis.
38. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
39. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
40. Hydraulic and hydrostatic testing equipment.
41. Environmental chambers not using hazardous air pollutant gases.
42. Shock chambers, humidity chambers and solar simulators.
43. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
44. Process water filtration systems and demineralizers.
45. Demineralized water tanks and demineralizer vents.

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46. Boiler water treatment operations, not including cooling towers.
47. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.
48. Oxygen scavenging (de-aeration) of water.
49. Ozone generators.
50. Fire suppression systems.
51. Emergency road flares.
52. Steam vents and safety relief valves.
53. Steam leaks.
54. Steam cleaning operations.
55. Steam and microwave sterilizers.
56. Site assessment work to characterize waste disposal or remediation sites.
57. Miscellaneous additions or upgrades of instrumentation.
58. Emissions from combustion controllers or combustion shutoff devices.
59. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units or such vehicles (i.e. antifreeze, fuel additives).
60. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
61. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
62. Residential wood heaters, cookstoves, or fireplaces.
63. Barbecue equipment or outdoor fireplaces used in conjunction with any residential or recreational use.

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64. Log wetting areas and log flumes.
65. Periodic use of pressurized air for cleanup.
66. Solid waste dumpsters.
67. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.
68. Natural gas odoring activities unless the Department determines that a nuisance may occur.
69. Emissions from engine crankcase vents.
70. Storage tanks used for the temporary containment of materials resulting from an emergency reporting of an unanticipated release.
71. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
72. Mixers, blenders, roll mills, or calenders for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.
73. The storage, handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to equipment only).
74. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
75. Tall oil soap storage, skimming, and loading.
76. Water heaters used strictly for domestic (non-process) purposes.
77. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
78. Agricultural operations, including onsite grain storage.

SECTION VII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;

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- e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Pollution Control and Ecology
Air Division
ATTN: Air Enforcement
Post Office Box 8913
Little Rock, AR 72219

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.6 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department within 24 hours of discovery of the occurrence. The initial report may be made by telephone and shall include:
- a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,
 - e. The duration of the deviation,
 - f. The average emissions during the deviation,
 - g. The probable cause of such deviations,

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- h. Any corrective actions or preventive measures taken or being take to prevent such deviations in the future, and
- i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) within 24 hours of discovery of the occurrence and such report will serve as both the initial report and full report.

- 9. Pursuant to 40 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
- 10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- 11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.
19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:

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- a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.

21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.

22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or

- d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
- 23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

AIR DIVISION

INVOICE REQUEST FORM

(9-96)

Facility Name & Address:

Arkansas Poly, Inc.
Mr. David Webb - Plant Engineer
1248 South 28th Street
Van Buren, Arkansas
72956

CSN: 17-0100

Permit No: 1331-AOP-R1

Permit Description: T5 Modification

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

Initial Fee Calculations:

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

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

Mod Fee Calculations:

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

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

F =

Fee Amount: \$ 1000.00

Engineer: Paul Osmon
Date: October 11, 2001

Public Notice

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

Arkansas Poly, Inc., 1248 South 28th Street, Van Buren Arkansas has requested a modification to their Title V Air Permit for their plastic bag manufacturing facility to add an additional reconditioned four color printing press. The new permit limits will be: PM/PM₁₀ - 2.4 tpy (0.4 tpy increase); SO₂ - 2.4 tpy (0.4 tpy increase); VOC - 249.4 tpy (0.4 tpy increase); CO - 2.4 tpy (0.4 tpy increase); NO_x - 2.4 tpy (0.4 tpy increase).

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

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp, Information Officer. Citizens desiring technical information concerning the application or permit should contact Paul Osmon, Engineer. Rhonda Sharp and can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744. Paul Osmon can be reached at the Department's NW Arkansas office, 1810 W. Sunset, Springdale, Arkansas 72766, telephone: (501)927-3257 Extension 12

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

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

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

Dated this

Randall Mathis
Director