

ADEQ OPERATING AIR PERMIT

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

Permit #: 1331-AOP-R2
Renewal No. 1
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:

and

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE:	Arkansas Poly, Inc.
CSN:	17-0100
PERMIT NUMBER:	1331-AOP-R2
FACILITY ADDRESS:	1248 South 28 th Street Van Buren, AR 72956
COUNTY:	Crawford
CONTACT POSITION:	Safety Supervisor - Ed Maestri
TELEPHONE NUMBER:	(479)474-5036
FAX NUMBER:	(479)474-3911
REVIEWING ENGINEER:	Paul Osmon
UTM North-South (Y):	3290.3 km N
UTM East-West (X):	379.3 km E
	Zone 15

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SECTION II: INTRODUCTION

Summary of Permit Activity

Permit No. 1331-AOP-R2 is the first renewal of the operating permit for Arkansas Poly, Inc. There are no changes proposed in the permit limits or the equipment and its mode of operation at the facility. The emission limits for products of combustion of natural gas in the dryers have been recalculated in this permit renewal and the plantwide limit for VOC emissions from printing has been increased from 247 tons per year to 249 tons per year.

Process Description

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 an extruder machine. The extruder heats the polyethylene pellets to a drawable consistency then forces it through a circular die where it is drawn very thin and is formed into a tubular shape. The polyethylene film is air cooled, collapsed, and wound on to a roll. Polyethylene film is shipped direct to customers as a finished product, sent to the Press Department, or sent to the Converting Department where film is heat sealed into individual bags.

Regulations

This facility is subject to regulation under the *Arkansas Air Pollution Control Code (Regulation 18)*, the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19)*, and the *Regulations of the Arkansas Operating Air Permit Program (Regulation #26)* because it emits over 100 tpy of VOC.

The facility is an area source and is subject to regulation under 40 CFR Part 63, Subpart KK--the *National Emission Standards for the Printing and Publishing Industry*. The facility is required to limit its emission of any single HAP to less than 10 tpy and total HAPS to less than 25 tpy. Material balance records must be maintained of all hazardous air pollutant usage at the facility.

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY				
Source	Description	Pollutant	Emission Rates	Cross

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			lb/hr	tpy	
Total Allowable Emissions		PM	0.6	0.6	
		PM ₁₀	0.6	0.6	
		SO ₂	0.6	0.6	
		VOC	83.6	249.6	
		CO	0.6	0.6	
		NO _x	0.6	2.6	
HAPs*		Single HAP*	-	9.0	
		Total HAP*	-	24.0	
		Methanol*	1.0	4.4	
		MIBK*	0.6	2.7	
Facility	Printing VOC PAL	VOC	-	249.0	9
Facility	Printing HAP PAL	Single HAP	-	9.0	9
		Total HAP	-	24.0	
Facility		Methanol	-	4.4	9
		MIBK	-	2.7	
01	Six Color Flexographic Printing Press No. 1	VOC	25.0	-	9
		Methanol	0.3	-	
		MIBK	0.2	-	
02	Press No. 1 Between Color Dryer	PM	0.1	0.1	13
		PM ₁₀	0.1	0.1	
		SO ₂	0.1	0.1	
		VOC	0.1	0.1	
		CO	0.1	0.1	
		NO _x	0.1	0.5	
03	Press No. 1 Main Tunnel Dryer	PM	0.1	0.1	13
		PM ₁₀	0.1	0.1	
		SO ₂	0.1	0.1	
		VOC	0.1	0.1	
		CO	0.1	0.1	
		NO _x	0.1	0.5	
04	Six Color	VOC	38.5	-	9

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
	Flexographic Printing Press No. 2	Methanol MIBK	0.4 0.2	- -	
05	Press No. 2 Between Color Dryer	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.1	0.1 0.1 0.1 0.1 0.1 0.5	13
06	Press No. 2 Main Tunnel Dryer	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.1	0.1 0.1 0.1 0.1 0.1 0.5	13
07	One Color In-Line Printer	VOC Methanol MIBK	1.7 0.1 0.1	- - -	9
08	Press No. 3 Between Color Dryer	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.1	0.1 0.1 0.1 0.1 0.1 0.3	13
09	Press No. 3 Main Tunnel Dryer	PM PM ₁₀ SO ₂ VOC CO NO _x	0.1 0.1 0.1 0.1 0.1 0.1	0.1 0.1 0.1 0.1 0.1 0.3	13
10	Four Color	VOC	17.8	-	9

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
	Flexographic Printing Press No. 3	Methanol	0.2	-	
		MIBK	0.1	-	

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

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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, allowed 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.

Permit No. 1331-AOP-R1 was issued on December 16, 1998. This permit was issued to allow a press to be added to the facility and some equipment rearrangement. Criteria pollutant emission limits remained at: PM/PM₁₀ - 2.4 tpy, SO₂ - 2.4 tpy, VOC - 249.4 tpy, CO - 2.4 tpy, and NO_x - 2.4 tpy. PAL limits for methanol and methyl isobutyl ketone were increased to 4.4 tpy and 2.7 tpy respectively.

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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 run through any of three printing presses (SN-01, SN-04, and SN-10) and rewound on the other end. Each press can apply several colors (6 colors: SN-01 and SN-04, 4 colors: SN-10) to the surface of the film. Between each color, the between-color natural gas-fired dryers apply heated air to the ink to dry the ink surface before the next color is applied. The inks contain solvents that evaporate upon heating. After the final ink color is applied, the material passes through the main drying tunnel where the remaining solvent is evaporated from the ink. The material is rewound on a roll and sent to a customer.

Some customers require warning labels such as "DANGER OF SUFFOCATION" on their bags. Such labeling cannot be done on the printing presses, so a small inline printer (SN-07) imprints a label on the polyethylene film. This printing process is usually very slow and so the inks are dried using ambient air. After the polyethylene film is printed, it then goes into a bag machine where a heat seal is applied and then the finished bags are either wound up into a roll or shipped loose in a box to a customer.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with the hourly emission rates will be demonstrated by the maximum capacity of the equipment. Compliance with the yearly limit will be demonstrated by material balance required in Specific Conditions No. 3 and 4.

SN	Description	Pollutant	lb/hr	tpy
01	Six Color Flexographic Printing Press No. 1	VOC	25.0	-
04	Six Color Flexographic Printing Press No. 2	VOC	38.5	-
07	One Color In-Line Printer	VOC	1.7	-
10	Four Color Flexographic Printing Press No. 3	VOC	17.8	-
Facility	Printing VOC PAL	VOC	-	249.0

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2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with the hourly emission rates will be demonstrated by the maximum capacity of the equipment. Compliance with the yearly limit will be demonstrated by material balance in Specific Condition No. 5.

SN	Description	Pollutant	lb/hr	tpy
01	Six Color Flexographic Printing Press No. 1	Methanol MIBK*	0.25 0.13	- -
04	Six Color Flexographic Printing Press No. 2	Methanol MIBK*	0.38 0.19	- -
07	One Color In-Line Printer	Methanol MIBK*	0.02 0.01	- -
10	Four Color Flexographic Printing Press No. 3	Methanol MIBK*	0.18 0.09	- -
Facility	Printing HAP PAL	Methanol MIBK*	- -	5.8 2.9
Facility	Printing HAPS	Single HAP Total HAP	- -	9.0 24.0

* - Methyl Isobutyl Ketone

3. Pursuant to §19.501 of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52 Subpart E, the permittee shall not exceed 249.0 tons per year of VOCs used in the printing process for any twelve consecutive months. The facility currently keeps records in 4 week increments and the sum for any consecutive 13 record periods shall not exceed 249.0 tons.
4. Pursuant to §19.705 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 3 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 the Department in accordance with General Provision 7. During 12 month summations that the

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calculated total exceeds 237.5 tons (95% of PSD threshold), the permittee will be required to submit additional record keeping to demonstrate that the accuracy of the record keeping is sufficiently accurate to assure that 250 tons could not have been exceeded.

5. Pursuant to §18.1004 of Regulation #18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall keep records which demonstrate compliance with the yearly limits established in Specific Condition No. 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 the Department in accordance with General Provision 7.
6. 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

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materials used for source categories or purposes other than printing and publishing.

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

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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.

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**SN-02, SN-03, SN-05, SN-06, SN-08, and SN-09
Dryers**

Source Description

Between each color, the between-color natural gas-fired dryers (Press 1: SN-02, Press 2: SN-05 and Press 3: SN-08) apply heated air to the ink to dry the ink surface before the next color is applied. The inks contain solvents that evaporate upon heating. After the final ink color is applied, the material passes through the main drying tunnel (Press 1: SN-03, Press 2: SN-06 and Press 3: SN-09) where the remaining solvent is evaporated from the ink. All emissions from the presses are accounted for where the material is applied. The dryer emissions are only products of natural gas combustion.

Specific Conditions

7. Pursuant to §19.501 of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with the emission rates will be demonstrated by the maximum capacity of the equipment.

SN	Description	Pollutant	lb/hr	tpy
02	Press No. 1 Between Color Dryer	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.5
03	Press No. 1 Main Tunnel Dryer	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.5
05	Press No. 2 Between Color Dryer	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.5
06	Press No. 2 Main Tunnel Dryer	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1

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SN	Description	Pollutant	lb/hr	tpy
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.5
08	Press No. 3 Between Color Dryer	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.3
09	Press No. 3 Main Tunnel Dryer	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.3

8. Pursuant to §18.801 of Regulation #18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with the emission rates will be demonstrated by the maximum capacity of the equipment.

SN	Description	Pollutant	lb/hr	tpy
02	Press No. 1 Between Color Dryer	PM	0.1	0.1
03	Press No. 1 Main Tunnel Dryer	PM	0.1	0.1
05	Press No. 2 Between Color Dryer	PM	0.1	0.1
06	Press No. 2 Main Tunnel Dryer	PM	0.1	0.1
08	Press No. 3 Between Color Dryer	PM	0.1	0.1
09	Press No. 3 Main Tunnel Dryer	PM	0.1	0.1

9. Pursuant to §18.501 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the 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.

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Arkansas Poly, Inc. is in compliance with the applicable regulations cited in the permit application. Arkansas Poly, Inc. will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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

Title VI Provisions

7. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
8. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
9. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class

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If substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

10. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

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

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SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated June 5, 2002. There are no insignificant activities listed in the application.

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

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SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 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 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000, 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 §26.406 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 CFR 70.6(a)(1)(ii) and §26.701(A)(2) 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 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) 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;

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- c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
- 6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) 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 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219
- 8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.701(C)(3)(b) of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the 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,

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- e. The duration of the deviation,
- f. The average emissions during the deviation,
- g. The probable cause of such deviations,
- h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
- i. The name of the person submitting the report.

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

- 9. Pursuant to 40 CFR 70.6(a)(5) and §26.701(E) 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 CFR 70.6(a)(6)(i) and §26.701(F)(1) 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 CFR 70.6(a)(6)(ii) and §26.701(F)(2) 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 CFR 70.6(a)(6)(iii) and §26.701(F)(3) 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

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termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.701(F)(5) 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 CFR 70.6(a)(7) and §26.701(G) of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.701(H) 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 CFR 70.6(a)(9)(i) and §26.701(I)(1) 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 CFR 70.6(b) and §26.702(A) and (B) 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.

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19. Pursuant to 40 CFR 70.6(c)(1) and §26.703(A) 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 CFR 70.6(c)(2) and §26.703(B) of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 CFR 70.6(c)(5) and §26.703(E)(3) 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 §26.704(C) of Regulation #26, nothing in this permit shall alter or affect the following:

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- 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.

APPENDIX A
40 CFR 63, Subpart KK
National Emission Standards for Printing and Publishing Industry