



ARKANSAS

ENERGY & ENVIRONMENT

January 6, 2022

Via email to: Will.rogers@us.abb.com
ty.gayeski@us.abb.com & First Class Mail

Will Rogers
HSE Manager
ABB Installation Products, Inc.
5601 East Highland Drive
Jonesboro, AR 72401

Re: Notice of Final Permitting Decision; Permit No. 1630-AR-10

Dear Mr. Rogers,

After considering the application, any public comments, and other applicable materials as required by APC&EC Reg.8.211 and Ark. Code Ann. § 8-4-101 *et seq.*, this notice of final permitting decision is provided for:

ABB Installation Products, Inc.
5601 E. Highland Drive
Jonesboro, AR 72401

Permit Number: 1630-AR-10

Permitting Decision: approval with permit conditions as set forth in final Permit No. 1630-AR-10

Accessing the Permitting Decision and Response to Comments, if any:
<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/1630-AR-10.pdf>.

Accessing the Statement of Basis:
<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/1630-AR-10-SOB.pdf>.

The permitting decision is effective on the date stated in the attached Certificate of Service unless a Commission review has been properly requested under Arkansas Pollution Control & Ecology Commission's Administrative Procedures, Regulation No. 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as

provided under Chapter Six of Regulation No. 8. Such a request shall be in the form and manner required by Reg.8.603, including filing a written Request for Hearing with the Commission secretary at 3800 Richards Rd, North Little Rock, Arkansas 72117. If you have any questions about filing the request, please call the Commission at 501-682-7890.

This permit is your authority to construct, operate, and maintain the equipment and control apparatus as set forth in your application initially received on 9/20/2021.

Sincerely,

A handwritten signature in black ink, appearing to read "William K. Montgomery", with a long horizontal flourish extending to the right.

William K. Montgomery
Associate Director, Office of Air Quality, Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure: Certificate of Service

CERTIFICATE OF SERVICE

I, Cynthia Hook, hereby certify that the final permit decision notice has been mailed by first class mail to ABB Installation Products, Inc., 5601 East Highland Drive, Jonesboro, AR, 72401, on this 6th day of January, 2022.

A handwritten signature in black ink that reads "Cynthia Hook". The signature is written in a cursive style with a large, stylized "C" and "H".

Cynthia Hook, AA, Office of Air Quality



DIVISION OF ENVIRONMENTAL QUALITY

MINOR SOURCE AIR PERMIT

PERMIT NUMBER: 1630-AR-10

IS ISSUED TO:

ABB Installation Products, Inc.
5601 E. Highland Drive
Jonesboro, AR 72401
Craighead County
AFIN: 16-00275

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DIVISION OF ENVIRONMENTAL QUALITY'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. § 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

A handwritten signature in black ink, appearing to read "William K. Montgomery", written over a horizontal line.

William K. Montgomery
Associate Director, Office of Air Quality
Division of Environmental Quality

January 6, 2022

Date

ABB Installation Products, Inc.
Permit #: 1630-AR-10
AFIN: 16-00275

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ABB Installation Products, Inc.

Permit #: 1630-AR-10

AFIN: 16-00275

List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	Arkansas DEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
HAP	Hazardous Air Pollutant
Hp	Horsepower
lb/hr	Pound Per Hour
NESHAP	National Emission Standards (for) Hazardous Air Pollutants
No.	Number
NO _x	Nitrogen Oxide
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate Matter Equal To Or Smaller Than Ten Microns
PM _{2.5}	Particulate Matter Equal To Or Smaller Than 2.5 Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

ABB Installation Products, Inc.
Permit #: 1630-AR-10
AFIN: 16-00275

Section I: FACILITY INFORMATION

PERMITTEE: ABB Installation Products, Inc.

AFIN: 16-00275

PERMIT NUMBER: 1630-AR-10

FACILITY ADDRESS: 5601 E. Highland Drive
Jonesboro, AR 72401

MAILING ADDRESS: 5601 East Highland Drive
Jonesboro, AR 72401

COUNTY: Craighead County

CONTACT NAME: Will Rogers

CONTACT POSITION: HSE Manager

TELEPHONE NUMBER: (870) 819-3629

REVIEWING ENGINEER: Bart Patton

UTM North South (Y): Zone 15: 3966596.27 m

UTM East West (X): Zone 15: 714571.37 m

Section II: INTRODUCTION

Summary of Permit Activity

ABB Installation Products, Inc. manufactures PVC-coated conduit pipe and pipe fittings at their facility at 5601 E. Highland Drive, Jonesboro, AR 72401.

In this revision, the following changes were made:

- Removed SN-51 Bosch Water Tank (Chromate)
- Removed SN-55 Plasma Cutting (Cable Tray Process Line)
- Replaced SN-09B Sulfuric Acid Dip with SN-09B Hydrochloric Acid Dip

Annual emissions increased as follows: HCl, 0.01.

Annual emissions decreased as follows: PM/PM₁₀, 8.4; NO_x, 4.5; Chromium Trioxide, 0.01.

Process Description

There are four principal operations at the facility:

- 1) Manufacture of PVC-Coated Pipe (Ocal® Pipe Line)
- 2) Manufacture of PVC-Coated Fittings (Ocal® Fitting Line)
- 3) Zinc Plating Process
- 4) Carlon® Process

The PVC-coated conduit process includes steps required to receive and process steel and aluminum conduit pipe and fittings to increase the conduit system's corrosion resistance. A variety of corrosion-resistant treatments are employed, including galvanizing, painting and PVC coating.

There are also off-line processes, including injection molding of small parts, cable tray manufacturing, and reprocessing of off-spec materials.

Ocal ® Pipe Line

The following processing steps are used in the pipe line.

1. Steel pipe and aluminum pipe conduit is received and stored on site.
2. Both ends of the steel pipe are threaded using a water-soluble cutting fluid. Threading machines are available for this step.
3. The steel pipe is bundled and cleaned in a series of dip tanks. The bundles are moved from tank to tank by crane.

4. The acid tank (SN-09B) contains 9-14% w/v hydrochloric acid, HCl, plus a 1-4% v/v fume suppressant that lowers the surface tension, creates a foam blanket on the surface, and inhibits corrosion. The HCl tank operates at ambient temperature and does not require heating or cooling. The pipes drain over the tank, and no fumes are observed escaping from the pipes. A side-draft exhaust fan continuously removes air from above the tank.
5. Periodically, approximately 1000 gallons of the tank solution is removed to reduce the iron content and recharge the solution. This removed solution is discharged to the plant wastewater system for treatment. Fume suppressant is added to the tank as needed to maintain the recommended depth of foam blanket.
6. To restore the acid strength, 31% HCl is added back to the tank. Fume suppressant is added to the 31% HCl tote to suppress fumes. The HCl is gravity-fed from the tote to the tank by an acid-resistant hose immersed under the foam blanket in the tank.
7. The steel pipe bundle is dipped in hot water to remove residual acids from the surface.
8. The steel pipe bundle is dipped in cold water to remove additional residual acids from the surface.
9. The steel pipe bundle is dipped in the flux tank (SN-09C), which contains an aqueous solution of zinc ammonium nitrate/chloride triple salt. The approximate concentration is 21%, by weight. The tank is operated at room temperature. Fumes from this operation, along with fumes from the phosphoric acid dip (SN-09A) and hydrochloric acid dip (SN-09B) are exhausted to Scrubair Scrubbers 1 and 2, and discharged through Stacks S-9 and S-10.
10. Aluminum pipe bundles are first rinsed in the hot water tank and then cleaned by dipping in a tank containing 10% phosphoric acid (SN-09A). The tank is maintained at 160-180°F using an immersion heater. After the acid dip, the aluminum pipe is dipped in hot and cold water and allowed to dry. Unlike the steel pipe, the aluminum pipe will not be galvanized and thus goes directly to the painting operation (see Step 17). Fumes from SN-09A, along with fumes from the hydrochloric acid dip (SN-09B) and the ammonium chloride dip (SN-09C) are exhausted to Scrubair Scrubbers 1 and 2, and discharged through Stacks S-9 and S-10.
11. The steel pipes are fed into the galvanizing system, one at a time, on a horizontal conveyor. The first step in the galvanizing system is a preheat oven (SN-45), which performs final drying and preheating of the pipe. The oven is equipped with a double-pane wall which draws air from the surrounding area; the air flows through a heat exchanger fired by a 0.66553 MMBtu/hr, natural gas burner. The oven operates at about 225°F and is equipped with a blower, rated at 1,177 cfm which moves the air through the heat exchanger and mixing chamber. Exhaust from the oven is directed through the ends. A collection hood on the inlet end collects the heated air and products of combustion and exhausts them through Stack S-45.

12. The pipe passes from the preheat oven down to auger-style dipping equipment and into the Molten Zinc Kettle (SN-47). The tank is maintained at a temperature of about 835°F. Two natural gas burners (SN-15) rated at 1.1942 MMBtu/hr each are fired to heat air being circulated around the Zinc Kettle. The burners are firing into the firing box and exhausted separately from the zinc fumes. The products of combustion of natural gas from the Zinc Kettle are routed to the galvanizing combustion stacks. Zinc fumes, PM, and any HAPs coming from the open top of the Zinc Kettle are exhausted through a collection hood to the batch filter dry suction system (Niederhausen baghouse), which discharges through Stack S-47. The natural gas combustion products are vented to the Niederhausen baghouse. A Back-up Galvanizing Train (SN-16) is available to operate when the primary train is down. The back-up system vents through Stack S-16. Zinc skims and dross are taken from the molten zinc in the Zinc Kettle (SN-47) and sent to the MZR-750 Metaullics Zinkoff Recovery System (SN-50), located outdoors. This device is equipped with one gas fired burner, rated at 1.76 MMBtu/hr. The products of combustion are uncontrolled. The device separates free zinc from the dross mixtures, and recovers commercially acceptable zinc to be reused in the galvanizing process. The recovered zinc is returned to the Zinc Kettle. The waste material is put in containers and sent off site for recycling.
13. The pipe is mechanically lifted from the Zinc Kettle and allowed to drain into the kettle as it is being removed. The extraction equipment includes magnetic rollers and gear wheels with drive and motors, a blowing off device using compressed air to removed excess zinc from the pipe exteriors, collection arms and magnetic plates for the blowing-out process (SN-48), and a blowing-out station with steam supply. Liquid zinc is returned to the tank. PM and zinc fumes are captured by the batch filter dry suction system (Niederhausen baghouse), which discharges through Stack S-47.
14. The pipe interiors are blown out (SN-49) with superheated steam to remove excess zinc. One end of the pipe is dropped in front of an opening in a high-velocity suction plenum. The other end is fitted with a steam blower. Superheated steam is blown through the pipe and into the suction plenum. Exhaust from the suction plenum is routed through the batch filter dry suction system (Niederhausen baghouse), which discharges through Stack S-47. Steam is generated by one of two high-pressure, natural gas-fired boilers, each rated at 8.6 MMBtu/hr (SN-17A and SN-17B). Combustion products are discharged through Stacks S-17A and S-17B. The superheater is electric and is not an emission source.
15. Both pipe ends are then heated over an open flame produced by four natural gas burners, two at each end (two burners noted as SN-21, two as SN-22), with each burner rated at 1.0 MMBtu/hr. The combustion products are vented through hoods and discharged as fugitive emissions.
16. After drying, the pipe is inspected and bundled.
17. Prior to interior painting, the pipe may be manually cleaned and blown down with compressed air to remove dust.

18. Aluminum pipe and steel pipe go to one of two lines: (i) a manual paint line, or (ii) an automated paint line. The pipe interiors are painted before the pipe undergoes the PVC-coating process. On the manual paint line, the Manual Paint Booth (SN-23) is an 8 foot x 8 foot booth into which the bundles are placed. The interior of each pipe in the bundles is painted on at a time using an air-atomized spray gun with a lanced nozzle. The manual paint booth is exhausted through Stack S-23. On the automated paint line, the Automated Paint Machine (SN-24A) consists of a smaller booth with two spray guns on long nozzles, which are guided through the conveyORIZED pipe, along with eight spray nozzles to apply primer to pipe exteriors. A two-part polyurethane paint is used for all pipe interior painting. The automated pipe interior paint machine exhausts through Stack S-24, along with the Pipe Exterior Primer Box (SN-24B).
19. After being painted, the pipe is allowed to dry and is then stored until ready for processing in the PVC coating line.
20. The pipe painted on the manual paint line is staged on a rack at the entrance of the PVC coating area. An acetone-based primer is applied to pipe exteriors by brushing. This is accomplished in a down-flow Paint Booth (SN-25B), approximately 13 feet by 8 feet, which vents as a fugitive source. The pipe painted on the automated paint line is primed in a primer box (SN-25A) with enclosed air spray, which discharges through Stack S-25.
21. The pipe on the manual paint line is then processed through either the natural gas-fired Preheat Oven (SN-26) or an electric pre-heat oven to activate the primer. The combustion products from the gas-fired oven are discharged through Stack S-26.
22. The pipe on the manual paint line is rolled into the Manual Dip Tank (SN-28A) containing liquid PVC at room temperature. The pipe is then cured in a forced-air Curing Oven (SN-28B) fired by two natural gas burners, each rated at 1.2 MMBtu/hr. The pipe is heated to between 320 and 350°F to cure the PVC coating. Minor air emissions from the Dip Tank and Curing Oven are exhausted to the Smog Hog, and discharged through Stack S-28.
23. After curing, the pipe on the manual paint line passes through a recirculating water spray to be cooled. It is allowed to dry and the ends are uncapped. The pipe is then bundled for shipping.
24. The pipe painted on the automated paint line passes into the Preheat Oven (SN-27A) and is rolled into a Dip Tank (SN-27B) containing liquid PVC at room temperature. The PVC coated pipe is treated in a Curing Oven (SN-27C) at 320-350°F. Minor emissions from the Preheat Oven, Dip Tank, and Curing Oven are exhausted to the Torit Donaldson baghouse, which discharges through Stack S-27.
25. The ends of the coated pipe from both paint lines are trimmed. The pipe is inspected; rejects are removed. The pipe is labeled, the threads are manually brushed with urethane paint in the Thread Coating operation (SN-29), and thread protectors are installed at each end. The pipe is then bundled for shipping. This process vents as a fugitive source.

Ocal® Fitting Line

The following process steps are used in the fitting line.

1. The fittings are processed in a similar fashion to the pipes, but are not galvanized. The fittings are received and disassembled.
2. Fittings are subsequently coated on one of three lines: Fittings, Mold, and Powder. The fittings to be painted on the Fittings and Mold lines are then sandblasted to remove the finish coating. The Media Blaster (SN-30) is a grit tumbling machine, equipped with a baghouse that vents indoors.
3. Fittings Line: The sandblasted fittings are painted and primed by dipping in the paint booths (SN-43) containing an acetone-based primer. After the primer is dry, the fittings are jigged (tooled) and conveyed through a Preheat Oven (SN-36) where they are heated to 320-350°F. The Preheat Oven is heated by 2 natural gas burners rated at 1.0 MMBtu/hr each. Emissions from the oven are collected by a canopy hood and discharged through Stack S-36. After preheating, the fittings are manually dipped in the liquid PVC. Fumes from the PVC tank (part of SN-36) are collected by a hood and exhausted through Stack S-36. After dipping, the fittings are cured in an oven fired by 2 natural gas burners rated at 1.0 MMBtu/hr each. The curing oven (part of SN-36) is also exhausted through Stack S-36. After curing, the fittings are cooled in a water bath, removed, and allowed to dry. They are then trimmed, dejigged (detooled), inspected, reassembled, and packaged for shipping.
4. Mold Line: Some fittings are painted and primed in a separate automated paint station (SN-38) which exhausts to Stack S-38. Some fittings are pre-heated in the Coupling Oven rated 0.1 MMBtu/hr (Warming Oven/Coupling on the Mold Line in the Insignificant Activities list). The fittings are then cured in a natural gas-fired warming oven rated at 0.1 MMBtu/hr (Warming Oven/Primer Cure in the Insignificant Activities list) and injection molded, followed by assembly and packaging for shipping.
5. Powder Line: Some of the fittings are powder coated in a fluidized bed. These fittings are jigged (tooled), preheated, dipped in the powder PVC coating, and cured. The finished parts are water cooled, reassembled, and packaged for shipping. The Pre-coat and Curing Ovens for the powder line (Category A-1 Insignificant Activities) are identical to those on the Fittings Line. They both exhaust through Stack S-37.
6. Parts for rework are soaked in an acetone tank (located remotely from the Ocal Fittings Operation; Category A-13 Insignificant Activity), stripped of their coating, and introduced to the beginning of the process.

Off-line Processes

There are several processes that are operated off-line with no point source exhaust. These include the following:

1. Injection molding machines for PVC coating of some fittings, nuts, couplings, and screws.
2. Several small machining and pipe bending operations.
3. Washing and degreasing aluminum-casting parts with a Stoelting conveyor spray-washer/degreaser unit, using a water-based cleaner (a Category A-9 Insignificant Activity). After the washing and degreasing, the parts are dried with a 400-cfm fan and ambient air.

The Carlon® Process uses 24 natural gas-fired infrared heaters (a Category A-1 Insignificant Activity), each rated at 0.1 MMBtu/hr heat input. This process vents as a fugitive source.

Zinc Plating Process

There are three plating lines (SN-01) for zinc (not chromium) electroplating of steel electrical components. Parts are brought to the loading/unloading station either mounted on racks, with the rack being processed through the plating line or loaded in a barrel by moving the barrel from tank to tank. These parts are then moved through the process by soaking and electro cleaning, followed by activation in an acid dip. The zinc plating tanks contain a very small amount of muriatic acid, which has the potential to evaporate into the atmosphere. The concentration of HCl in the zinc plating tanks is estimated to be 0.5 ounces per gallon of muriatic acid. The zinc plating tanks are open top tanks.

Emissions from all of the soak cleaning, electro cleaning, acid dip, and chromate conversion tanks will be collected by an emission management system and sent to two scrubbers, each with their own stack. Scrubber S-01A is an acid scrubber with a flow rate of 36,160 cfm, and S-01B is an alkali scrubber with a flow rate of 36,115 cfm. Both scrubbers use water as the scrubbing medium. Each of the tanks will be outfitted with “push” air and a slotted hood pick-up.

Two natural-gas fired boilers, the Plating North Boiler, Primary Service (SN-03) and the Plating South Boiler, Back-up Service (SN-04) provide heat to the plating lines. Both are rated at 6.3 MMBtu/hr.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective March 14, 2016
Rules of the Arkansas Plan of Implementation for Air Pollution Control, Rule 19, effective August 6, 2020

ABB Installation Products, Inc.
Permit #: 1630-AR-10
AFIN: 16-00275

Total Allowable Emissions

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	18.9	82.5
PM ₁₀	18.9	82.5
PM _{2.5}	See Note*	
SO ₂	1.5	2.3
VOC	N/A	99.0
CO	5.1	19.9
NO _x	4.5	22.6
HCl	0.01	0.01
Single HAP	N/A	9.9
Total HAP	N/A	24.9
Acetone	48.95	196.94

*PM_{2.5} limits are source specific, if required. Not all sources have PM_{2.5} limits.

Section III: PERMIT HISTORY

The initial permit #1630-A was issued on September 18, 1995.

The first modification, permit # 1630-AR-1, was issued on February 17, 1998. This permit modification consisted of the following changes:

- Changing the process description for the solution evaporator to more accurately describe the process.
- Changing the required emission management equipment for specified tanks in the plating process. Delete the Acid Scrubber (SN-01) and the Caustic Scrubber (SN-02) from the original permit. Add the combined emissions from these two sources going through a single manifold emission system with no controls - the Emission Management System (SN-01).
- Increasing allowable annual emissions to permit year round operations to be conducted twenty four hours per day. Hourly emission limits remained the same.

The second modification, permit #1630-AR-2 was issued on September 6, 2002. It allowed the facility to expand and add operations, which were relocated from other plants outside of Arkansas. T&B requested enforceable emissions limits of VOCs to 99.0 tpy and of 9.9 tpy for individual HAPs and 24.9 tpy for combined HAPs. Compliance is based on purchasing or production records of paint and solvent usage, with this information entered into a spreadsheet that will automatically calculate both total VOCs and individual HAPs from the maximum contents specified in the product MSDS, so that actual usage will always be below these limits.

Permit No. 1630-AR-3 was issued on January 4, 2005 which updated emission rate tables and accounted for updated stack parameters and installation of additional process equipment. The equipment included two 0.15 MMBtu/hr pipe primer pre-heat burners, a centrifuge to recover sulfuric acid used in the dip tanks, and 8.6 MMBtu/hr boiler (SN-17) to provide steam for the pipe inside and outside blow off units. The new boiler replaced Boiler #1 (formerly SN-17), Boiler #2 (SN-19), and Superheaters No. 1 and 2 (SN-18 and SN-19). T&B also requested the permit be modified to account for emissions exhausted through the vents in the Chemical Storage and Mix Rooms, from sandblasting off-spec pipe and fittings (SN-41 and SN-42), and from pipe and fitting primer application (SN-43 and SN-44). The pipe primer pre-heat burners, centrifuge, and vents were added to the Insignificant Activities list. Permitted emissions of SO₂, VOC, CO, NO_x, and Acetone increased by 1.1 tpy, 0.1 tpy, 5.2 tpy, 4.6 tpy, and 58.24 tpy, respectively. PM/PM₁₀ decreased by 18.1 tpy.

Permit No. 1630-AR-4 was issued on June 17, 2009. The permit modification replaced PVC Line #1 (SN-27). Proposed Line #1 consisted of a pre-heat oven, a PVC dip tank, a curing oven, and a baghouse. Existing Line #1 was natural gas-fired, whereas the replacement will be electric heated but will have the same limitations to potential to emit. The Sludge Dryer (SN-05), Coolant Solution Evaporator (SN-08), Automatic Pipe Paint Booth (SN-24), Fittings Paint Booth No.1 (SN-31), Fittings Paint Booth No.2 (SN-32), Fittings Paint Booth No.3 (SN-33), Fittings Paint Booth No.4 (SN-34), Off-Spec Pipe Sandblasting (SN-41), and Pipe Primer Application (SN-44) were removed. Overall, permitted emissions due to replacing the PVC line did not increase.

ABB Installation Products, Inc.

Permit #: 1630-AR-10

AFIN: 16-00275

Permit No. 1630-AR-5 was issued on December 26, 2013. In this modification, the following changes were made: 1) SN-45 through SN-52 were added. SN-52 is a filter system for SN-45, SN-47, SN-48, and SN-49, but generates no emissions of its own. 2) SN-13 through SN-16 were removed, with freedom to reuse and re-identify portions of that equipment under SN-45 through SN-52. Annual emissions changed as follows: PM/PM₁₀, + 38.1 tpy; CO, -2.5 tpy; NO_x, -3.1 tpy; and Chromium Trioxide, +0.17 tpy.

Permit No. 1630-AR-6 was issued on April 12, 2016. In this modification, the following changes were made:

- 1) Add two scrubbers to the existing Emission Management System at SN-01. The source was also renamed Plating Acid Tanks and Plating Caustic Tanks (the source of the emissions) in lieu of Emission Management System (the control system for the tank emissions). With the new controls, the source's opacity limit was set to 5%.
- 2) Recalculate emissions for SN-03 and SN-04 using the latest AP-42 emission factors.
- 3) Return SN-09C to the permit. The Ammonium Chloride Dip has been on site since the beginning. It was omitted from Specific Conditions #1 and #2 when they were re-organized at Permit #1630-AR-3, but it has been in operation continuously and remained in the Process Description.
- 4) Return SN-15 and 16 to the permit. Galvanizing Combustion Stacks No. 1 and 2 (SN-15 and 16) were modified as part of Permit #1630-AR-5, but were mistakenly replaced with SN-46 in that permit. Those sources have been re-identified as Galvanizing Kettle Furnace (SN-15) and Backup Kettle Furnace (SN-16). Specific Condition #15 has been changed to refer to SN-15, SN-16, and SN-47, the primary and back-up zinc kettles and the zinc extraction system.
- 5) Add SN-17B to the permit. SN-17A is the 8.6 MMBtu/hr natural gas-fired boiler previously designated as SN-17. SN-17B is a backup boiler of the same capacity, installed in 2009, when the previous SN-17 was replaced. The facility has stated that SN-17B has not been operated simultaneously with SN-17A, but that it is physically possible to operate both boilers simultaneously.
- 6) Correct the heat rating and emissions for SN-21 and SN-22. These sources each have two 1-MMBtu/hr burners. No heat rating was given in Specific Conditions #1 and #2 in recent permits, but emissions were calculated for less than the correct amounts.
- 7) Return SN-24 to service, and reidentify it as SN-24A and SN-24B. It was removed from the permit at Permit #1630-AR-4, when it was removed from service but kept on site.
- 8) Re-identify SN-25 as SN-25A and SN-25B. Equipment and emissions are unchanged.
- 9) Add SN-29. This source number was previously used for a different purpose and removed at Permit #1630-AR-3.
- 10) Return SN-30 to the permit. The Media Blaster process was mistakenly removed from Permit #1630-AR-3 but has been in operation continuously since then.
- 11) Re-identify SN-35 as part of SN-36. SN-36 was previously identified as a 2.4 MMBtu/hr oven, but should have been identified as a 1.2 MMBtu/hr oven. Newly identified SN-36 includes one 1.2 MMBtu/hr oven used for preheating (old SN-35) and one 1.2 MMBtu/hr oven used for curing.

- 12) Remove SN-42 from the permit. SN-42 appears to have been similar or the same as SN-30, which was restored to the permit at this revision.
- 13) Remove SN-46 from the permit. SN-46 appears to have been similar or the same as SN-15, which was restored to the permit at this revision.
- 14) Delete Specific Conditions #17 and 18 for SN-50. The facility tracks annual emissions for VOCs and HAPs as part of Specific Conditions #7 and 11. Annual emissions for other pollutants were recalculated for 8,760 operating hours per year, to match the other gas-fired sources in the permit.
- 15) Revise Specific Condition #19 for SN-51. The usage limit on chromic acid was revised, from 2,920 gallons to 100 pounds per rolling 12-month period.
- 16) Delete Specific Condition #21 for SN-51. Alternative testing data was supplied.
- 17) Add new sources SN-52, SN-53, and SN-54.
- 18) Add 24 natural gas-fired infrared heaters, 0.1 MMBtu/hr each, as an Insignificant Activity in Category A-1.
- 19) Add Coupling Oven from the Mold line of the Fittings process, and Pre-heat and Cure Ovens from the Powder line of the Fittings process, 0.1 MMBtu/hr each, as Insignificant Activities in Category A-1.
- 20) Move Warming Oven from Category A-13 to A-1 in the Insignificant Activities List.
- 21) Add Acetone Strip Tanks (existing) to Category A-13 in the Insignificant Activities List.
- 22) Revise Specific Condition #9 to allow materials of TLV equal to or greater than 1.0 mg/m³, in accordance with the most recent version of the Department's Non-Criteria Pollutant Strategy.
- 23) Delete Specific Condition #12. The TLV table in Specific Condition #9 was removed, meaning that the lb HAP/gal limit in Specific Condition #12 was no longer required.

Annual emissions changed as follows: PM/PM₁₀, + 5.0 tpy; SO₂, + 0.2 tpy; CO, + 9.8 tpy; NO_x, +7.4 tpy; Acetone, +2.19 tpy; and Chromium Trioxide, -0.16 tpy.

Permit No. 1630-AR-7 was issued on February 14, 2017. In this modification, the following changes were made: Remove and replace ovens at SN-36 and SN-37 (4 ovens, were 1.2 MMBtu/hr each, now low NO_x ovens at 1.0 MMBtu/hr each). Annual emissions decreased as follows: -0.2 tpy CO, -1.2 tpy NO_x.

Permit No. 1630-AR-8 was issued on June 18, 2018. In this modification, SN-55 Plasma Cutting (Cable Tray Process Line) was added. Annual emissions increased as follows: 8.2 tpy PM/PM₁₀, 4.5 tpy NO_x.

Permit No. 1630-AR-9 was issued on July 7, 2020. This administrative amendment added a Parts Washer/Degreaser as a category A-9 Insignificant Activity. Annual emissions were unchanged.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.19.501 *et seq.* and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Stack(s)	Description	Pollutant	lb/hr	tpy
01	S-01A	Plating Acid Tanks	PM ₁₀	0.7	3.1
	S-01B	Plating Caustic Tanks			
03	S-03	Boiler – Primary Service Plating North (6.3 MMBtu/hr)	PM ₁₀	0.1	0.3
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.6	2.4
			NO _x	0.7	2.8
04	S-04	Boiler – Backup Service Plating South (6.3 MMBtu/hr)	PM ₁₀	0.1	0.3
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.6	2.4
			NO _x	0.7	2.8
09A	S-09, S-10	Phosphoric Acid Dip	PM ₁₀ ^A	0.4	1.5
			VOC	0.2	99.0 ^B
09C		Ammonium Chloride Dip	PM ₁₀	0.2	0.1
15	S-47	Galvanizing Kettle Furnace (2 burners, 1.1942 MMBtu/hr each)	PM ₁₀	0.1	0.1
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.3	0.9
			NO _x	0.3	1.1
16	S-16	Back-up Galvanizing Kettle Furnace (2 burners, 1.1942 MMBtu/hr each)	PM ₁₀	0.1	0.1
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.3	0.9
			NO _x	0.3	1.1
17A	S-17A	Boiler – Primary Service Ocal North (8.6 MMBtu/hr)	PM ₁₀	0.1	0.3
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.8	3.2
			NO _x	0.9	3.8
17B	S-17B	Boiler – Backup Service Ocal South (8.6 MMBtu/hr)	PM ₁₀	0.1	0.3
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.8	3.2
			NO _x	0.9	3.8

SN	Stack(s)	Description	Pollutant	lb/hr	tpy
21	Fugitive	Thread Burning Burners 1 and 2 (2 burners, 1.0 MMBtu/hr each)	PM ₁₀	0.1	0.1
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.2	0.8
			NO _x	0.2	0.9
22	Fugitive	Thread Burning Burners 3 and 4 (2 burners, 1.0 MMBtu/hr each)	PM ₁₀	0.1	0.1
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.2	0.8
			NO _x	0.2	0.9
23	S-23	Manual Pipe Inside Paint Booth	PM ₁₀ VOC	1.5 5.5	6.2 99.0 ^B
24A	S-24	Automated Pipe Inside Paint Booth	PM ₁₀ VOC	1.1 4.2	4.8 99.0 ^B
24B		Automated Pipe Outside Primer Box			
25A	S-25	Machine Pipe Primer Application	VOC	21.9	99.0 ^B
25B	Fugitive	Manual Pipe Primer Application			
26	S-26	Manual PVC Preheat Oven (2 burners, 1.2 MMBtu/hr each)	PM ₁₀	0.1	0.1
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.2	0.9
			NO _x	0.3	1.1
27A	S-27	Automated PVC Line Preheat Oven	PM ₁₀ VOC	2.2 10.3	9.6 ^C 99.0 ^B
27B		Automated PVC Line Dip			
27C		Automated PVC Line Electric Curing Oven			
28A	S-28	Manual PVC Line Dip	PM ₁₀ SO ₂	0.4 0.1	9.6 ^C 0.1
28B		Manual PVC Line Curing Oven (2.4 MMBTU/hr)	VOC	30.9	99.0 ^B
			CO	0.2	0.9
			NO _x	0.3	1.1
29	Fugitive	Thread Coating Brush Paint	PM ₁₀ VOC	0.1 0.2	0.2 99.0 ^B
			30	Fugitive	Media Blaster (Fittings and Mold)

SN	Stack(s)	Description	Pollutant	lb/hr	tpy
36	S-60 through S-63	Fittings PVC Preheat Oven, Dip, and Cure Oven (2 ovens, 1.0 MMBtu/hr each)	PM ₁₀	0.1	0.1
			SO ₂	0.1	0.1
			VOC	4.6	99.0 ^B
			CO	0.2	0.8
			NO _x	0.1	0.5
37	S-64 through S-67	Powder Coating Preheat Oven, Coating Bed, and Cure Oven (2 ovens, 1.0 MMBtu/hr each)	PM ₁₀	0.1	0.1
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.2	0.8
			NO _x	0.1	0.5
38	S-38	Coupling Paint & Primer Paint Booth	PM ₁₀	1.6	6.7
			VOC	1.2	99.0 ^B
43	S-43	Fittings Primer Application/Dip	VOC	2.7	99.0 ^B
45	S-45	Galvanizing Preheat Oven (0.665553 MMBtu/hr)	PM ₁₀	0.1	0.1
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.1	0.3
			NO _x	0.1	0.3
47	S-47	Zinc Kettle (2 burners, 1.1942 MMBtu/hr each)	PM ₁₀	0.1	0.2
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.2	0.9
			NO _x	0.3	1.1
48	S-47	Pipe Exterior Blowdown	PM ₁₀	5.2	22.6
49	S-47	Pipe Interior Blowdown	PM ₁₀	4.8	20.8
50	S-50	Zinc Recovery System (1.76 MMBtu/hr)	PM ₁₀	0.1	0.1
			SO ₂	0.1	0.1
			VOC	0.1	99.0 ^B
			CO	0.2	0.7
			NO _x	0.2	0.8
52	S-52	Paint Booth	VOC	1.4	99.0 ^B
53	S-53	Paint Mix Room	PM ₁₀	0.1	0.1
			VOC	12.6	99.0 ^B
54	S-54	Zinc Metallizer	PM ₁₀	0.1	0.4
55	S-55	Removed from service at R10			
Plantwide	N/A	All sources emitting VOCs, including sources combusting natural gas and sources using paints, coatings, and solvents	VOC	N/A	99.0 ^B

^A Phosphoric Acid emissions are included in PM at SN-09A.^B The plantwide limit for total VOC is 99.0 tpy.^C Sum of total annual PM emission limit for both SN-27 and SN-28.

2. The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Stack(s)	Description	Pollutant	lb/hr	tpy
01	S-01A	Plating Acid Tanks	PM	0.7	3.1
	S-01B	Plating Caustic Tanks			
03	S-03	Boiler – Primary Service Plating North (6.3 MMBtu/hr)	PM	0.1	0.3
04	S-04	Boiler – Backup Service Plating South (6.3 MMBtu/hr)	PM	0.1	0.3
09A	S-09, S-10	Phosphoric Acid Dip	PM ^A	0.4	1.5
09B		Hydrochloric Acid Dip	HCl	0.01	0.01
09C		Ammonium Chloride Dip	PM	0.2	0.1
15	S-47	Galvanizing Kettle Furnace (2 burners, 1.1942 MMBtu/hr each)	PM	0.1	0.1
16	S-16	Back-up Galvanizing Kettle Furnace (2 burners, 1.1942 MMBtu/hr each)	PM	0.1	0.1
17A	S-17A	Boiler – Primary Service Ocal North (8.6 MMBtu/hr)	PM	0.1	0.3
17B	S-17B	Boiler – Backup Service Ocal South (8.6 MMBtu/hr)	PM	0.1	0.3
21	Fugitive	Thread Burning Burners 1 and 2 (2 burners, 1.0 MMBtu/hr each)	PM	0.1	0.1
22	Fugitive	Thread Burning Burners 3 and 4 (2 burners, 1.0 MMBtu/hr each)	PM	0.1	0.1
23	S-23	Manual Pipe Inside Paint Booth	PM Acetone	1.5 0.65	6.2 2.85
24A	S-24	Automated Pipe Inside Paint Booth	PM Acetone	1.1 0.50	4.8 2.19
24B		Automated Pipe Outside Primer Box			

SN	Stack(s)	Description	Pollutant	lb/hr	tpy
25A	S-25	Machine Pipe Primer Application	Acetone	42.00	184.00
25B	Fugitive	Manual Pipe Primer Application			
26	S-26	Manual PVC Preheat Oven (2 burners, 1.2 MMBtu/hr each)	PM	0.1	0.1
27A	S-27	Automated PVC Line Preheat Oven	PM	2.2	9.6 ^c
27B		Automated PVC Line Dip			
27C		Automated PVC Line Electric Curing Oven			
28A	S-28	Manual PVC Line Dip	PM	0.4	
28B		Manual PVC Line Curing Oven (2.4 MMBTU/hr)			
29	Fugitive	Thread Coating Brush Paint	PM	0.1	0.2
30	Fugitive	Media Blaster (Fittings and Mold)	PM	1.0	4.1
36	S-60 through S-63	Fittings PVC Preheat Oven, Dip, and Cure Oven (2 ovens, 1.0 MMBtu/hr each)	PM Acetone	0.1 0.46	0.1 2.01
37	S-64 through S-67	Powder Coating Preheat Oven, Coating Bed, and Cure Oven (2 ovens, 1.0 MMBtu/hr each)	PM	0.1	0.1
38	S-38	Coupling Paint & Primer Paint Booth	PM Acetone	1.6 0.14	6.7 0.61
42	N/A	Removed from service at R6			
43	S-43	Fittings Primer Application/Dip	Acetone	5.20	5.28
45	S-45	Galvanizing Preheat Oven (0.665553 MMBtu/hr)	PM	0.1	0.1
46	N/A	Removed from service at R6			
47	S-47	Zinc Kettle (2 burners, 1.1942 MMBtu/hr each)	PM	0.1	0.2
48	S-47	Pipe Exterior Blowdown	PM	5.2	22.6

SN	Stack(s)	Description	Pollutant	lb/hr	tpy
49	S-47	Pipe Interior Blowdown	PM	4.8	20.8
50	S-50	Zinc Recovery System (1.76 MMBtu/hr)	PM	0.1	0.1
51	Fugitive	Removed from service at R10			
53	S-53	Paint Mix Room	PM	0.1	0.1
54	S-54	Zinc Metallizer	PM	0.1	0.4
55	S-55	Removed from service at R10			
Plantwide	N/A	All sources emitting HAPs, including sources combusting natural gas and sources using paints, coatings, and solvents	Single HAP Total HAP	N/A N/A	9.9 ^B 24.9 ^B

^A Phosphoric Acid emissions are included in PM at SN-09A.

^B May not exceed 9.90 tpy of any single HAP or 24.90 tpy of combination HAP on plantwide basis.

^C Sum of total annual PM emission limit for both SN-27 and SN-28.

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

SN	Limit	Regulatory Citation
01, 09, 23, 24	20%	§19.503
03, 04, 15, 16, 17, 21, 22, 26, 27, 28, 29, 30, 36, 37, 38, 45, 47, 48, 49, 50, 53, 54	5%	§18.501

- 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 Ark. Code Ann. § 8-4-303. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Reg.18.901 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

6. The permittee shall not emit more than 99.0 tpy of VOCs total from all sources at the facility per consecutive 12-month period. [Regulation No. 19 §19.501 et seq. and 40 CFR Part 52, Subpart E]
7. The permittee shall calculate VOC emissions for each month and maintain the records in a spreadsheet or other well organized format, which demonstrate compliance with Specific Condition #6. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. [Regulation No. 19 §19.705, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee shall not exceed HAP emission rates greater than 9.9 tpy for any individual HAP or 24.9 for total HAPs. Compliance with this condition shall be demonstrated through compliance with Specific Condition #11. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
9. The permittee shall not use any paint, coating, or solvent containing any HAP with a TLV value less than 1.0 mg/m³, with the exceptions of HDI (CAS 822-06-0) and MDI (CAS 101-68-8). Compliance with this condition shall be demonstrated through compliance with Specific Condition #10. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee shall maintain records of the ACGIH TLV values as listed on current MSDS forms, or in the most recently published ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs) for each HAP-containing material used. The concentration of each HAP in lb/gal and the corresponding TLV should be noted on these records. These records shall be maintained in a spreadsheet, database, or other well organized format. These records shall be kept on-site and made available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
11. The permittee shall maintain records of the amount of HAP emissions and air contaminant emissions each month. These records shall indicate the amount of each HAP-containing material and/or air contaminant-containing material used during that month as well as the corresponding maximum HAP content and/or air contaminant content for each HAP or air contaminant in that material. The monthly emissions shall be calculated for each material by multiplying the usage by the corresponding HAP and/or air contaminant content(s). The total HAP emissions and air contaminant emissions from all products shall also be indicated on these records. A copy of the MSDS sheet for each product used shall accompany these records. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve (12) month rolling total of HAP and air contaminant emissions and each individual month's data shall be kept on-site and shall be made available to Department personnel upon request. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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12. If actual emissions exceed 95% of major source thresholds, i.e., 95 tpy of all VOCs, 9.5 tpy of any single HAP, or 23.75 tpy of combined HAPs, the facility shall demonstrate, through the accuracy of their recordkeeping, that major source thresholds have not been exceeded. [Regulation No. 19 §19.501 *et seq.*, Regulation No. 18 §18.801, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
13. The permittee shall only use pipeline quality natural gas for fuel in any combustion unit. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

SN-15, SN-16, and SN-47 Conditions

14. The permittee shall not exceed a throughput of 750 tons of zinc through the combined processes at SN-15, SN-16, and SN-47 per rolling 12-month period. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #14. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Department personnel upon request. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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Section V: INSIGNIFICANT ACTIVITIES

The Division of Environmental Quality 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 Regulation 19 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in applications dated February 9, 2009; October 10, 2014; and January 14, 2020. [Reg.19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
24 natural gas-fired infrared heaters, 0.1 MMBtu/hr each	A-1
Warming Ovens: Pre-heat (Fitting Powder Line), 0.1 MMbtu/hr Cure Oven (Fitting Powder Line), 0.1 MMbtu/hr Coupling Oven (Fitting Mold Line), 0.1 MMBtu/hr, Primer Cure Oven (Fitting Mold Line), 0.1 MMBtu/hr	A-1
Parts Washer/Degreaser	A-9
Injection Molding	A-13
Chemical Recovery Room Centrifuge Exhaust	A-13
Chemical Mix Process Exhaust	A-13
Pipe Primer Pre-Heat	A-13
Inside Pipe Blow-Out Booth No. 1 and No. 2	A-13
Acetone Strip Tanks	A-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 (Ark. Code Ann. § 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 (Ark. Code Ann. § 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 (Ark. Code Ann. § 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. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
3. The permittee shall notify the Division of Environmental Quality in writing within thirty (30) days after each of the following events: 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. [Reg.19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Reg.19.410(B) and/or Reg.18.309(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee must keep records for five years to enable the Division of Environmental Quality to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Division of Environmental Quality may use the records, at the discretion of the Division of Environmental Quality, to determine compliance with the conditions of the permit. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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 Division of Environmental Quality electronically using <https://portal.adeq.state.ar.us> or mail them to the address below. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

ABB Installation Products, Inc.

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AFIN: 16-00275

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

7. The permittee shall 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 Division of Environmental Quality. The permittee must notify the Division of Environmental Quality of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Division of Environmental Quality within sixty (60) calendar days after the completion of testing. [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall provide: [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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; and
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Reg.19.303 and/or Reg.18.1104 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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 Division of Environmental Quality may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Reg.19.601 and/or Reg.18.1101 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Division of Environmental Quality 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.

- b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, overnight delivery, or online at <https://eportal.adeq.state.ar.us>) to the Division of Environmental Quality by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Division of Environmental Quality, 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 shall allow representatives of the Division of Environmental Quality upon the presentation of credentials: [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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 Division of Environmental Quality issued this permit in reliance upon the statements and presentations made in the permit application. The Division of Environmental Quality has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- 13. The Division of Environmental Quality may revoke or modify this permit when, in the judgment of the Division of Environmental Quality, 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. [Reg.19.410(A) and/or Reg.18.309(A) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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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 Division of Environmental Quality 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 Division of Environmental Quality denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Division of Environmental Quality may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Reg.19.407(B) and/or Reg.18.307(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Reg. 18 and/or Reg. 19 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [Ark. Code Ann. § 8-1-105(c)]
19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Division of Environmental Quality approval. The Division of Environmental Quality may grant such a request, at its discretion in the following circumstances:
 - a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Reg.18.314(A) and/or Reg.19.416(A), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Division of Environmental Quality approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:

- a. Such a request does not violate a federal requirement;
- b. Such a request is temporary in nature;
- c. Such a request will not result in a condition of air pollution;
- d. The request contains such information necessary for the Division of Environmental Quality to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
- e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
- f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Reg.18.314(B) and/or Reg.19.416(B), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Division of Environmental Quality approval. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:

- a. The request does not violate a federal requirement;
- b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
- c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Reg.18.314(C) and/or Reg.19.416(C), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

22. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [Reg.18.1001, Reg.19.701, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]