



ARKANSAS
Department of Environmental Quality

DEC 26 2013

Charles Clay, Safety & Environmental Engineer
Thomas & Betts Corporation
5601 E. Highland Dr.
Jonesboro, AR 72401

Dear Mr. Clay:

The enclosed Permit No. 1630-AR-5 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 11/27/2012.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 1630-AR-5 for the construction, operation and maintenance of an air pollution control system for Thomas & Betts Corporation to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 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, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Bates", is written over a horizontal line.

Mike Bates
Chief, Air Division

ADEQ MINOR SOURCE AIR PERMIT

Permit No. : 1630-AR-5

IS ISSUED TO:

Thomas & Betts Corporation
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 DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



Mike Bates
Chief, Air Division

DEC 26 2013

Date

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE:	Thomas & Betts Corporation
AFIN:	16-00275
PERMIT NUMBER:	1630-AR-5
FACILITY ADDRESS:	5601 E. Highland Drive Jonesboro, AR 72401
MAILING ADDRESS:	5601 E. Highland Dr. Jonesboro, AR 72401
COUNTY:	Craighead County
CONTACT NAME:	Charles Clay
CONTACT POSITION:	Safety & Environmental Engineer
TELEPHONE NUMBER:	870-935-2559
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

Thomas & Betts Corporation manufactures PVC-coated conduit pipe and pipe fittings at their facility at 5601 E. Highland Drive, Jonesboro, AR 72401.

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.

Process Description

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 basically two different process lines to be installed at the facility. The first line will manufacture PVC coated conduit pipe, and the second makes PVC coated fittings. There are also off-line processes, including injection molding of small parts and reprocessing of off-spec materials.

Manufacturing of PVC-Coated Conduit Pipe (Pipe Line)

The following processing steps are used in the pipe line.

1. Pipe material is received and stored on site.
2. The pipe is cut to approximately 10-foot lengths using a water-cooled saw process.
3. The cut pipe is chamfered.
4. Both of the pipe ends are threaded using a water-soluble cutting fluid. Three threading machines are available for this step.
5. The pipe is bundled and cleaned in a series of dip tanks. The bundles are moved from tank to tank by crane. The first tank contains a 13 to 17% sulfuric acid solution with small quantities of Rodine (HCl-based material) inhibitor added. These dip tanks are maintained at 160 to 180°F with immersion heaters. A side draft exhaust is used to remove fumes from the area. The exhausts from these tanks are designated SN-09 and SN-10. The pipe is allowed to drain over the tank, prior to moving to the next step.

6. The sulfuric acid solution is recycled. Iron sulfate is recovered from the sulfuric acid solution by first chilling a side stream of the solution, and then centrifuging it to remove the iron sulfate material. This material is sold to outside companies. The centrifuged liquid is recycled to the sulfuric acid dip tanks.
7. The pipe bundle is dipped in hot water to remove residual acids from the surface.
8. The pipe bundle is dipped in cold water to remove additional residual acids from the surface.
9. The pipe bundle is dipped in the flux tank. This is an aqueous solution of zinc ammonium nitrate/chloride triple salt. The approximate concentration is 21% by weight. This tank is operated at room temperature.
10. Aluminum pipe bundles are first rinsed in the hot water tank and then cleaned in this same area by dipping in a tank containing 10% phosphoric acid. The tank is maintained at 160 to 180°F by an immersion heater. After the acid dip, aluminum pipe is dipped in hot and cold water and allowed to dry. Aluminum pipe goes straight to painting. It is not galvanized like the steel pipe.
11. The steel pipe is fed into the galvanizing system, one at a time on a horizontal conveyor. There are two identical galvanizing trains, one operating and the other on standby. The first step of the galvanizing system is a preheat oven. This oven performs final drying and pre-heating of the pipe. The oven is equipped with a double-pane wall which draws air from the open air around the furnace through the double-pane wall through a heat exchanger, which is equipped with a natural gas burner rated at 0.66553 MMBtu/hr. The oven operates at 375°F. The oven is equipped with a blower, rated at 1,177 cfm, which pushes the air through the heat exchanger and mixing chamber. Exhaust from the oven is directed through the ends. A collection hood on the inlet collects the heated air and products of combustion (SN-45). This hood is routed to the batch filter dry suction system (baghouse at SN-45).
12. The pipe passes from the pre-heat oven down to auger-style dipping equipment and into the molten zinc tank (Zinc Kettle SN-46). The tank is maintained at a temperature of 835°F. Two gas-fired burners rated at 1.1942 MMBtu/hr each are fired to heat air being circulated around the zinc kettle. The burners are fired into the firing box and exhausted (SN-46) separately from the zinc fumes. The products of combustion of natural gas from the Zinc Kettle are routed to the galvanizing combustion stacks (part of SN-46; formerly designated SN-15 and SN-16). 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.
13. Zinc skims and dross are taken from the molten zinc in the Zinc Kettle and sent to the MZR-750 Metallurgical Zinkoff Recovery System, located outdoors. This device is equipped with one gas-fired burner, rated at 1.76 MMBtu/hr. The products of combustion are uncontrolled (SN-50). 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 containerized and sent off site for recycling.
14. The pipe is mechanically lifted from the Zinc Kettle using a fully automated system 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 for removing excess zinc from the exterior of the pipes, collecting arms and magnetic plates for the blowing-out process, and a blowing-out station with team supply, traversing equipment and transfer possibility. Liquid zinc is returned to the tank. Particulate matter and zinc fumes are captured by the batch filter, dry suction system (SN-47).

15. The pipe interior is blown out 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. Steam is provided by a high pressure gas-fired boiler rated at 8.6 MMBtu/hr (SN-17).
16. Both pipe ends are then heated over an open flame natural gas burner. Each burner is rated at 150 MMBtu/hr. These burners are vented through hoods to SN-21 and SN-22.
17. For cooling, the heated pipe is then lowered into the temperature-controlled Bosch Water Tank, containing a solution of 0.49% chromic acid and 99.51% water. The pipe is allowed to dry on a rack. The tank is equipped with a chiller which maintains the tank at 55°F. Emissions of water vapor containing chromium trioxide (SN-51) occur as the solution is vaporized when coming in contact with the heated pipe. Emissions are uncontrolled.
18. After drying, the pipe is inspected and bundled.
19. Prior to interior painting, the pipe may be manually cleaned and blown down with compressed air to remove dust.
20. The pipe interior is painted in one of two areas: 1) a manual paint booth or 2) an automated paint booth. If the manual paint booth is used, the pipe's interior is painted before the pipe goes through the PVC coating process. The manual paint booth is an 8 ft x 8 ft booth into which the bundle is placed. The interior of each pipe in the bundle is painted one at a time using an air-atomized spray gun with a lanced nozzle. The manual paint booth is exhausted through SN-23. If the automated paint machine is used, it is after the pipe has gone through the PVC coating line. The automated paint machine consists of a smaller booth with up to 8 spray guns on long nozzles, which are guided through the conveyORIZED pipe. Only one of the two painting systems is used at a time. A two-part polyurethane paint is used for all pipe interior painting.
21. After being painted in the manual booth, the pipe is allowed to dry before it is stored until it is ready to be processed in the PVC coating line.
22. The pipe is staged on a rack at the entrance of the PVC coating area. An acetone-based primer is applied to the preheated exterior of the pipe by brushing. This is accomplished in a down flow paint booth, approximately 13 ft x 8 ft. This booth is exhausted through SN-25.
23. The pipe is then processed through either the gas fired oven or the electrical heated oven to apply liquid PVC coating.
24. In the gas fired oven, pipe passes into the pre-heat oven and is rolled into a dip tank containing liquid PVC at room temperature. Some minor smoking occurs at the PVC dip tank, which is collected in a hood and exhausted to a baghouse (SN-28). The pipe is cured in a forced air oven. The oven has two natural gas burners, each rated at 1.2 MMBtu/hr. The pipe is heated between 320 and 350°F to cure the PVC coating material. Fumes from the curing oven are exhausted to a baghouse (SN-28).
25. After curing, the pipe is passed through a re-circulated spray water cooler. It is allowed to dry, and then the ends are uncapped. The pipe is then bundled for shipment.
26. In the electrical PVC coating and curing oven, pipe passes into the pre-heat oven and is rolled into a dip tank containing liquid PVC at room temperature. Some minor smoking occurs at the PVC dip tank, which is collected in a hood and exhausted to a baghouse (SN-

- 27). The pipe is heated between 320 and 350°F to cure the PVC coating material. Fumes from the curing oven are exhausted through a baghouse (SN-27).
27. If the automated paint booth is to be used for painting the pipe's interior, the bundle is moved to the paint line.
28. First, the ends of the pipe are trimmed and the pipe is inspected. Rejects are removed. The pipe is then labeled, and the threads are brush painted with urethane paint and thread protectors are installed at each end. The pipe is then bundled for shipment.
29. Off-line, pipe that is off-spec after galvanizing is returned to a sandblaster. Grit blast is used to remove the excess zinc from the pipe's exterior, and the pipe is then re-processed through the PVC coating train. The exhaust from the sandblaster passes through a baghouse and is then vented indoors.

Manufacturing of PVC-Coated Pipe Fittings (Fitting Line)

The following process steps are used in the fitting line.

1. The fittings are processed in a similar fashion but are not galvanized. First they are received and disassembled.
2. They are sandblasted to remove finish coating. The sand blaster is a grit/tumble machine. The unit is equipped with a baghouse that is vented indoors.
3. The fitting's interiors and exteriors are then painted in one of four paint booths. Each paint booth has a 2-ft-high by 6-ft 6-in-wide opening. Manual, air-atomized paint guns are used. The paint used is the same two-part polyurethane used to paint the pipe's interior.
4. The fittings are heated to 410 °F in an oven with a hanging conveyor. The oven is equipped with one 1.2 MMBtu/hr forced air, direct fired into the duct system natural gas burner. The oven is exhausted through a canopy hood to SN-35.
5. Pipe couplings are painted in a separate mechanized paint station with exhaust to SN-38.
6. Fittings are then dipped in the same acetone-based primer as is used in the pipe system. The dipping process occurs in one of the fitting paint booths.
7. After the primer has been dried, the fittings are jigged and placed in a pre-heat oven and heated to 320 to 350 °F. The pre-heat oven with a hanging conveyor is heated by a forced air, direct fired into the duct system natural gas burner rated at 1.2 MMBtu/hr. The oven is vented through a canopy hood covering the entire oven to SN-36, along with the fitting PVC coating curing oven.
8. After pre-heating, the fitting is manually dipped in PVC coating material. The dipping occurs in the same vicinity as the preheat oven. Any fumes generated are collected by the hood and removed to SN-36.
9. After dipping, the fittings are cured in a natural gas-fired forced air curing oven with a hanging conveyor. The oven has one burner rated at 1.2 MMBtu/hr and is exhausted to SN-36 through the combined hood covering the front of the two ovens.
10. After curing, the fittings are cooled in a water tank, removed, and allowed to dry. They are then trimmed, dejigged, inspected, reassembled, and packaged for shipping.
11. Some of the fittings are coated with a fluidized bed powder coat process. The fittings are pre-heated, dipped in the powder coat, and cured. The fitting powder coat pre-cure and

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curing oven are identical to the fitting PVC pre-coat and curing oven. They have a combined stack exhausting to SN-37.

12. Pipe nipples are painted off-line in two paint booths. The booths have an opening that is 2-ft high and 4-ft wide. The booths are exhausted through SN-39/40. These booths utilize the same two-part polyurethane paint that is painted on the fitting's interiors.

Off-line Processes

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

1. Four injection molding machines for PVC coating of some fittings, nuts, couplings, and screws.
2. Three machines for grinding the plastic scrap into recyclable pellets.
3. Several small machining and pipe bending operations.
4. Three band saws for cutting coated pipes.
5. One thread cleaning machine.
6. Two threaders for the bending machines.
7. A cleaning station using water-based cleaning process consisting of three tanks each with an 800-gallon capacity.

Existing Operations

There are three plating lines 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 a single manifold emission collection system. Each of the tanks will be outfitted with "push" air and a slotted hood pick-up. The exhaust will be provided by a single Dual blower. The rated discharge of the blower is 24,000 cfm at the stack. This stack is designated as SN-01. There will be no controls on the emission point.

Two natural-gas fired boilers, the primary service (SN-03) and the back-up service (SN-04) provide heat to the plating lines. Both are rated at 6.3 MMBtu/hr.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 27, 2013

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	21.2	77.7
PM ₁₀	21.2	77.7
SO ₂	1.3	2.1
VOC	82.1	99.0
CO	2.9	10.3
NO _x	4.5	16.4
Chromium Trioxide	0.05	0.17
Single HAP	25.66	9.9
Total HAP	25.71	24.9
Acetone	48.45	194.75

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.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table.
[Regulation 19 §19.501 et seq. and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Emission Management System	PM ₁₀	0.7	3.1
03	Boiler – Primary Service (6.3 MMBtu/hr)	PM ₁₀	0.1	0.3
		SO ₂	0.1	0.5
		VOC	0.1	99.0 ^B
		CO	0.2	0.6
		NO _x	0.7	2.8
04	Boiler – Backup Service (6.3 MMBtu/hr)	PM ₁₀	0.1	0.3
		SO ₂	0.1	0.5
		VOC	0.1	99.0 ^B
		CO	0.2	0.6
		NO _x	0.7	2.8
09	Sulfuric Acid Dip (2) Tanks	PM ₁₀ ^A	0.4	1.5
		VOC	0.2	99.0 ^B
10	Phosphoric Dip & (2) Hot Water Tanks	PM ₁₀ ^A	0.1	0.2
13	Galvanizing Dip Tanks (2) Preheat Ovens (2) (1.2 MMBtu/hr each)	Removed from service		
14	Galvanizing Pipe Blowouts (2)	Removed from service		
15	Galvanizing Combustion Stack No. 1 (4.0 MMBtu/hr)	Removed from service		
16	Galvanizing Combustion Stack No. 2 (4.0 MMBtu/hr)	Removed from service		
17	Boiler No. 1 (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
21	End of Pipe Line Heater No. 1	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	99.0 ^B
		CO	0.1	0.2
		NO _x	0.1	0.2

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SN	Description	Pollutant	lb/hr	tpy
22	End of Pipe Line Heater No. 2	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	99.0 ^B
		CO	0.1	0.2
		NO _x	0.1	0.2
23	Pipe Inside Paint Booth No. 1	PM ₁₀	1.5	6.2
		VOC	5.5	99.0 ^B
25	Pipe Primer Application	VOC	21.9	99.0 ^B
26	Primer Curing Oven	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
27	PVC Line #1 PVC Coating and (1) Electric Curing Oven (Baghouse 90%)	PM ₁₀	2.2	9.6 ^C
		VOC	10.3	99.0 ^B
28	PVC Line #2 PVC Coating and (1) Curing Oven 2.4 MMBTU/hr Natural Gas -Fired (Baghouse 90%)	PM ₁₀	2.2	9.6 ^C
		SO ₂	0.1	0.1
		VOC	30.8	99.0 ^B
		CO	0.2	0.9
		NO _x	0.3	1.1
35	Fittings Preheat / Paint Cure Oven (1.2 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	3.9	99.0 ^B
		CO	0.1	0.5
		NO _x	0.2	0.6
36	Fitting PVC Preheat, Dip, and Cure (2.4 MMBtu/hr)	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	4.6	99.0 ^B
		CO	0.2	0.9
		NO _x	0.3	1.1
37	Powder Coating Preheat and Cure (2.4 MMBtu/hr)	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
38	Coupling/Nipple Paint Booth	PM ₁₀	1.6	6.7
		VOC	1.2	99.0 ^B
42	Fittings Sandblasting	PM ₁₀	1.2	5.1
43	Fittings Primer Application/Dip	VOC	2.7	99.0 ^B

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SN	Description	Pollutant	lb/hr	tpy
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
46	Zinc Kettle (2.3884 MMBtu/hr)	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
47	Zinc Kettle, Extraction Equipment	PM ₁₀	0.1	0.1
48	Pipe Exterior Blowdown	PM ₁₀	5.2	22.6
49	Pipe Interior Blowdown	PM ₁₀	4.8	20.8
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	0.2
		NO _x	0.2	0.2

^A Phosphoric or Sulfuric Acid Emissions are included.

^B The plantwide limit for total VOC is 99.0 tpy

^C Sum of total annual PM₁₀ emission limit for both SN-27 and SN-28

2. The permittee shall not exceed the emission rates set forth in the following table.
[Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Emission Management System	PM	0.7	3.1
03	Boiler – Primary Service (6.3 MMBtu/hr)	PM	0.1	0.3
04	Boiler – Backup Service (6.3 MMBtu/hr)	PM	0.1	0.3
09	Sulfuric Acid Dip (2) Tanks	PM ^A	0.4	1.5
		HAPs	0.12	24.90 ^B
10	Phosphoric Dip & (2) Hot Water Tanks	PM ^A	0.1	0.2
13	Galvanizing Dip Tanks (2) Preheat Ovens (2) (1.2 MMBtu/hr each)	Removed from service		
14	Galvanizing Pipe Blowouts (2)	Removed from service		
15	Galvanizing Combustion Stack No. 1 (4.0 MMBtu/hr)	Removed from service		

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SN	Description	Pollutant	lb/hr	tpy
16	Galvanizing Combustion Stack No. 2 (4.0 MMBtu/hr)	Removed from service		
17	Boiler No. 1 (8.6 MMBtu/hr)	PM	0.1	0.3
21	End of Pipe Line Heater No. 1	PM	0.1	0.1
22	End of Pipe Line Heater No. 2	PM	0.1	0.1
23	Pipe Inside Paint Booth No. 1	PM HAPs Acetone	1.5 3.92 0.65	6.2 24.90 ^B 2.85
25	Pipe Primer Application	HAPs Acetone	14.66 42.00	24.9 ^B 184.00
26	Primer Curing Oven	PM	0.1	0.1
27	PVC Line #1 PVC Coating and (1) Electric Curing Oven (Baghouse 90%)	PM HAPs	2.2 0.35	9.6 ^C 24.90 ^B
28	PVC Line #2 PVC Coating and (1) Curing Oven 2.4 MMBTU/hr Natural Gas -Fired (Baghouse 90%)	PM HAPs	2.2 1.06	9.6 ^C 24.90 ^B
35	Fittings Preheat / Paint Cure Oven (1.2 MMBtu/hr)	PM HAPs Acetone	0.1 2.74 0.46	0.1 24.90 ^B 2.01
36	Fitting PVC Preheat, Dip, and Cure (2.4 MMBtu/hr)	PM HAPs	0.1 0.16	0.1 24.90 ^B
37	Powder Coating Preheat and Cure (2.4 MMBtu/hr)	PM	0.1	0.1
38	Coupling Paint Booth	PM HAPs Acetone	1.6 0.84 0.14	6.7 24.90 ^B 0.61
42	Fittings Sandblasting	PM	1.2	5.1
43	Fittings Primer Application/Dip	HAPs Acetone	1.81 5.20	24.90 ^B 5.28
45	Galvanizing Preheat Oven (0.665553 MMBtu/hr)	PM	0.1	0.1
46	Zinc Kettle (2.3884 MMBtu/hr)	PM	0.1	0.1
47	Zinc Kettle, Extraction Equipment	PM	0.1	0.1
48	Pipe Exterior Blowdown	PM	5.2	22.6
49	Pipe Interior Blowdown	PM	4.8	20.8

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SN	Description	Pollutant	lb/hr	tpy
50	Zinc Recovery System (1.76 MMBtu/hr)	PM	0.1	0.1
51	Bosch Water Tank (chromic acid dip)	Chromium Trioxide	0.05	0.17

A Phosphoric or Sulfuric Acid emissions are included.

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. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
01, 09, 10, 23, 24	20%	§19.503
All Other Sources	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 A.C.A. §8-4-303. [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18 §18.901 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 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]
- 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]
- 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 Conditions #11 and 20. [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 exceed the formulation of HAPs for the given minimum TLV in the following table in any HAP containing compound used at the facility. Compliance with this table shall be demonstrated through compliance with Specific Conditions #10 and #11. [Regulation No. 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Minimum Allowable TLV (mg/m ³)	Maximum Allowable Single HAP Content (lb/gal) ^a
>290	8.33
290	8.33
278.5	8.00
208.9	6.00
139.3	4.00
69.6	2.00
34.8	1.00
31.3	0.90
27.9	0.80
24.4	0.70
20.9	0.60
17.4	0.50
13.9	0.40
10.4	0.30
7.0	0.20
3.5	0.10

^a Chemicals such as HDI (CAS 822-06-0) and MDI (CAS 101-68-8) are not expected to rapidly volatilize and are emitted at a rate of less than 1.0 tpy shall be exempt from this table.

NOTE: Emissions of chromium trioxide or any other form of hexavalent chromium are not allowed under this table. All allowable emissions of that HAP are from SN-51, and compliance is to be demonstrated under Specific Condition #19.

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 each month. These records shall indicate the amount of each HAP-containing material used during that month as well as the corresponding maximum HAP content for each HAP in that material. The monthly emissions shall be calculated for each material by multiplying the usage by the corresponding HAP content(s). The total HAP 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

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total of HAP 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]

12. The permittee shall limit the maximum HAP concentration of all coatings as applied to 8.33 lb/gal. Compliance with this table 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]
13. 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]
14. 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-47 Conditions

15. The permittee shall not exceed a throughput of 750 tons of zinc through SN-46 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]
16. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #15. 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]

SN-50 Conditions

17. The permittee shall not exceed 2,190 operating hours at SN-50 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]
18. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #17. 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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SN-51 Conditions

19. The permittee shall not exceed a usage of 2,920 gallons of 100% (pure) chromic acid at SN-51 per rolling 12-month period. [Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
20. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #19. 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 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
21. The permittee shall complete the installation and stack construction for SN-51, test the vertical gas exit velocity, and submit this information to the Department.
 1. The installation and stack construction for SN-51, in accordance with the following table, shall be considered a condition for final issuance of this permit.

Source Number	Description	Minimum Height	Minimum Inside Diameter	Minimum Velocity	Velocity Type
SN-51	Bosch Water Tank (chromic acid)	30 ft	0.5 ft	650 ft/s	Vertical

2. Within 30 days of final permit issuance, the permittee shall test the vertical gas exit velocities from SN-51. Testing shall be conducted in accordance with EPA-approved methods.
3. Within 30 days of testing, the permittee shall submit these test results to the Department. If the vertical gas exit velocity is found to be less than previously reported to the Department, the permittee shall have the opportunity to demonstrate with refined air dispersion modeling that the facility does not violate the Department's Non-Criteria Pollutant Strategy or any other applicable standard. [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 Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated February 9, 2009.

Description	Category
Injection Molding	A-13
Warming Ovens	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

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19 §19.704 and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19 §19.410(B) and/or Regulation 18 §18.309(B) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19 §19.705 and/or Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19 §19.705 and/or Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor

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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 Department. The permittee must notify the Department 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 Department within thirty (30) calendar days after the completion of testing. [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee shall provide: [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §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. [Regulation 19 §19.303 and/or Regulation 18 §18.1104 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19 §19.601 and/or Regulation 18 §18.1101 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and

nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19 §19.410(A) and/or Regulation 18 §18.309(A) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19 §19.407(B) and/or Regulation 18 §18.307(B) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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

[Regulation 18 §18.314(A), Regulation 19 §19.416(A), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 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 Department approval. Any such emissions shall be included in the facilities total emissions and reported as such. The Department 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 Department 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.

[Regulation 18 §18.314(B), Regulation 19 §19.416(B), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

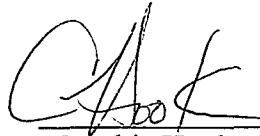
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21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant 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.

[Regulation 18 §18.314(C), Regulation 19 §19.416(C), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

CERTIFICATE OF SERVICE

I, Cynthia Hook, hereby certify that a copy of this permit has been mailed by first class mail to
Thomas & Betts Corporation, 5601 E. Highland Dr., Jonesboro, AR, 72401, on this
26th day of December, 2013.

A handwritten signature in dark ink, appearing to read 'C. Hook', is written over a horizontal line.

Cynthia Hook, ASIII, Air Division