

ADEQ MINOR SOURCE AIR PERMIT

Permit No. : 1668-AR-1

IS ISSUED TO:

J.V. Manufacturing, Inc.
701 Butterfield Coach Road
Springdale, AR 72765
Washington County
AFIN: 72-00320

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

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: J.V. Manufacturing, Inc.

AFIN: 72-00320

PERMIT NUMBER: 1668-AR-1

FACILITY ADDRESS: 701 Butterfield Coach Road
Springdale, AR 72765

MAILING ADDRESS: P.O. Box 229
Springdale, AR 72765

COUNTY: Washington

CONTACT POSITION: Brian LeBlanc

TELEPHONE NUMBER: (479) 751-7320

REVIEWING ENGINEER: Ann Sudmeyer

UTM North South (Y): Zone 15: 4004.2

UTM East West (X): Zone 15: 401.71

Section II: INTRODUCTION

Summary of Permit Activity

J. V. Manufacturing, Inc. owns and operates a facility located at 702 State Highway 265 Spur in Springdale which manufactures equipment for the handling of solid waste (balers, compactors, containers and transfer stations) and paints the equipment when manufacturing process has been completed. This permitting action is necessary to:

1. Increase the VOC content limit of the paint;
2. Increase the HAP content limit of the paint;
3. Permit acetone usage;
4. Replace specific HAP content limits with a TLV table;
5. Establish federally enforceable emission limits of hazardous air pollutants below major source thresholds;
6. Permit the emissions from the plasma cutting table (SN-02);
7. Permit the facility as a minor source; and
8. Make changes to the insignificant activities list.

The total permitted annual emission rate limit increases associated with this modification include: 15.0 tons per year (tpy) PM/PM₁₀, 8.5 tpy VOC, 6.2 tpy NO_x, and 10.00 tpy acetone. The permitted annual Total HAP emission rate limit is decreasing by 27.75 tpy.

Since the facility has established federally enforceable HAP emission rate limits below major source thresholds, the facility is not subject to 40 CFR Part 63, Subpart M – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*.

Process Description

Steel stock is received and stored on-site before being transferred to the metal working operations. The metal is cut with hand torches and a plasma cutting table (SN-02). The metal parts also go through washing, grinding, drilling, bending, and welding operations. The equipment is then coated in a paint booth and air dried in an adjacent drying room. Touch up painting may occur in other areas of the facility. All surface coating operations are listed under SN-01. Some of the finished equipment is then fitted with hydraulic mechanisms and controls.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective May 28, 2006

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	3.5	15.1
PM ₁₀	3.5	15.1
VOC	88.0	60.0
NO _x	1.4	6.2
Single HAP	55.00	9.50
Total HAP	55.00	23.75
Acetone	33.00	10.00

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Section III: PERMIT HISTORY

Permit #1668-A was issued to J.V. Manufacturing, Inc. on January 29, 1996. This was the initial permit for this facility. Criteria pollutant emission limits of 0.1 tons per year of PM/PM10 and 51.5 tons per year of VOC were set with permit #1668-A. Hazardous air pollutant emission rates of 41.7 tons per year of xylene, 0.8 tons per year of toluene, and 0.3 tons per year of ethylbenzene were also set with permit #1668-A.

Permit No. 1668-AOP-R0 was issued to J. V. Manufacturing on September 29, 1997. This was the initial operating permit for this facility. Criteria pollutant emission limits of 52.5 tons per year of VOC were set. Hazardous air pollutant emission rates of 52.5 tons per year of total HAPs were also set.

Permit No. 1668-AOP-R1 was issued on December 5, 2002. This permit renewal was issued as the first modification to their initial operating air permit. There were no changes to the facility or its processes with the issuance of this permit.

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., effective May 28, 2006 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Painting Operations	VOC	88.0	60.0
02	Plasma Cutting Table	PM ₁₀	3.5	15.1
		NO _x	1.4	6.2

2. The permittee shall not exceed the emission rates set forth in the following table. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Painting Operations	Single HAP	55.00	9.50
		Total HAP	55.00	23.75
		Acetone	33.00	10.00
02	Plasma Cutting Table	PM	3.5	15.1

3. 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 A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
02 ^A	20%	§18.501 and A.C.A.

A. As observed from the building openings near the plasma cutting table.

4. 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 A.C.A. §8-4-304 and §8-4-311]
5. 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 A.C.A. §8-4-304 and §8-4-311]

Plantwide Conditions

- 6. The permittee shall not use any VOC-containing material at the facility which has a VOC content greater than 8.0 lb/gal. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 7. The permittee shall not use any HAP-containing material at the facility which has a total HAP content greater than 5.0 lb/gal. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 8. The permittee shall not use any material at the facility which has an acetone content greater than 3.0 lb/gal. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 9. The permittee shall not use any HAP-containing materials at the facility which do not meet the requirements of the following table. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Minimum Allowable TLV of Each HAP (mg/m³)	Maximum Allowable Individual HAP Content (lb/gal)
500	5.00
400	4.00
300	3.00
200	2.00
100	1.00
10	0.10
1	0.01

- 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 at the facility. The concentration of each HAP in lb/gallon 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. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
- 11. The permittee shall not emit more than 60.0 tons of VOC from this facility in any consecutive 12-month period. The permittee shall maintain monthly records to demonstrate compliance with this specific condition. These records shall include the following:
 - a. The name of each VOC-containing material used;

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- b. The amount (gallons) of each VOC-containing material used during each month;
- c. The VOC content (lb/gal) of each VOC-containing material used, as documented by manufacturer's MSDS sheets or equivalent documentation;
- d. The weight (tons) of the total VOC emitted during each month; and
- e. The twelve month rolling total of the VOC emissions from the facility in tons per year.

The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee shall keep the records onsite, and make the records available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

- 12. The permittee shall not emit more than 9.5 tons of any single HAP from this facility in any consecutive 12-month period. [§19.405(B) of Regulation 19, §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 13. The permittee shall not emit more than 23.75 tons of any combination of HAPs from this facility in any consecutive 12-month period. [§19.405(B) of Regulation 19, §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 14. The permittee shall maintain monthly records to demonstrate compliance with Specific Conditions #12 and #13. These records shall include the following:
 - a. The name of each HAP-containing material used;
 - b. The amount (gallons) of each HAP-containing material used during each month;
 - c. The HAP content (lb/gal) of each individual HAP for each HAP-containing material used, as documented by manufacturer's MSDS sheets or equivalent documentation;
 - d. The weight (tons) of each individual HAP emitted during each month;
 - e. The weight (tons) of the total HAP emitted during each month; and
 - f. The twelve month rolling total of the HAP emissions (individual HAP and total HAPs) from the facility in tons per year.

The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee shall keep the records onsite, and make the records available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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15. The permittee shall not emit more than 10.00 tons of acetone from this facility in any consecutive 12-month period. The permittee shall maintain monthly records to demonstrate compliance with this specific condition. These records shall include the following:
- a. The name of each acetone-containing material used;
 - b. The amount (gallons) of each acetone-containing material used during each month;
 - c. The acetone content (lb/gal) of each acetone-containing material used, as documented by manufacturer's MSDS sheets or equivalent documentation;
 - d. The weight (tons) of the total acetone emitted during each month; and
 - e. The twelve month rolling total of the acetone emissions from the facility in tons per year.

The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee shall keep the records onsite, and make the records available to Department personnel upon request. [§18.1004 of Regulation 18 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 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 July 12, 2006 and correspondence received on August 18, 2006, September 21, 2006, and September 27, 2006.

Description	Category
Water Heater for Power Washer (0.355 BTU input)	A-1
Diesel Fuel Tank (400 gallons)	A-3
Used Oil Tank (400 gallons)	A-3
Hydraulic Oil Tank (1,800 gallons)	A-3
Electric Arc Welding	A-13
Hydraulic Hose Cutting Station (vented through wall)	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 A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913

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Little Rock, AR 72219

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee will provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - 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,

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

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16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §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 A.C.A. §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)]