

## RESPONSE TO COMMENTS

### ANTHONY FOREST PRODUCTS COMPANY (LAMINATING PLANT) PERMIT #1675-AR-6 AFIN: 70-00068

On September 14, 2012, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, written comments on the draft permitting decision were submitted by Mr. Kelly Olivier on behalf of Anthony Forest Products. The Department's response to these issues follows.

*Note: The following page numbers and condition numbers refer to the draft permit. These references may have changed in the final permit based on changes made during the comment period.*

**Comment #1: On page 7 of the draft permit, in the Total Allowable Emissions table, the annual emission rates for PM and PM<sub>10</sub> are indicated erroneously as 29.0 tpy each. This should be corrected to 63.2 tpy each.**

**Response to Comment #1: The Department concurs. The emission rates in the Total Allowable Emissions table on page 7 have been corrected to match the sums of the emission levels in Specific Conditions #1 and #2 on page 9 of the draft permit.**

**Comment #2: On page 10 of the draft permit, in the table listing opacity limits by source in Specific Condition #3, the opacity limit for SN-09 should be 10% in lieu of 5%.**

**Response to Comment #2: The Department concurs. The opacity limit for SN-09 has been corrected in the table in Specific Condition #3, to match the permit application and the Department's approval letter dated July 24, 2012.**

# ADEQ

ARKANSAS  
Department of Environmental Quality

OCT 29 2012

Kelly Olivier, Environmental Health & Safety Coordinator/Engineer  
Anthony Forest Products Company (Laminating Plant)  
Cooper Drive and Mims Drive  
El Dorado, AR 71730

Dear Mr. Olivier:

The enclosed Permit No. 1675-AR-6 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 7/3/2012.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 1675-AR-6 for the construction, operation and maintenance of an air pollution control system for Anthony Forest Products Company (Laminating Plant) 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,



Mike Bates  
Chief, Air Division

# ADEQ MINOR SOURCE AIR PERMIT


Permit No. : 1675-AR-6

IS ISSUED TO:

Anthony Forest Products Company (Laminating Plant)  
Cooper and Mims Drives  
El Dorado, AR 71730  
Union County  
AFIN: 70-00068

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

OCT 29 2012  
\_\_\_\_\_  
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 <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Smaller Than Ten Microns
SO <sub>2</sub>	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: Anthony Forest Products Company (Laminating Plant)

AFIN: 70-00068

PERMIT NUMBER: 1675-AR-6

FACILITY ADDRESS: Cooper and Mims Drives  
El Dorado, AR 71730

MAILING ADDRESS: Cooper Drive and Mims Drive  
El Dorado, AR 71730

COUNTY: Union County

CONTACT NAME: Kelly Olivier

CONTACT POSITION: Environmental Health & Safety Coordinator/Engineer

TELEPHONE NUMBER: 870-962-3206

REVIEWING ENGINEER: Bart Patton

UTM North South (Y): Zone 15: 3669487.37 m

UTM East West (X): Zone 15: 551467.44 m

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## Section II: INTRODUCTION

### Summary of Permit Activity

Anthony Forest Products Company, Laminating Plant (“Lam Plant”), located in El Dorado, Union County, Arkansas, produces laminated beams and laminated logs for use in building construction. The Lam Plant has been operating under Minor Source Air Permit number 1675-AR-5, issued on September 28, 2004.

This permit modification includes the following changes:

- 1) Lamination Building Baghouse (proposed SN-02) replaces existing Wood By-Product Transfer Cyclone (existing SN-02),
- 2) Specialty Products Building Baghouse (proposed SN-03) replaces existing Wood By-Product Transfer Cyclone for Special Products (existing SN-03), and
- 3) Cyclone (proposed SN-09) replaces existing Wood By-Products Transfer Cyclone (Hogging Process; existing SN-09), and Grinder will replace existing Hogger.

With these changes, the facility’s intention is to comply with the National Fire Protection Association’s combustible dust standards, as administered by the Occupational Safety and Health Administration.

The NAICS code for the facility was corrected in the statement of basis. The facility submitted a statement affirming that they are below the major source threshold for Greenhouse Gas emissions. Some permit condition wording was changed to match current ADEQ usage (“rolling twelve-month period” in lieu of “consecutive twelve-month period”). Opacity limits for SN-02, SN-03, and SN-09 were updated to match current Department guidance. Conditions for compliance with NESHAP CCCCCC were added for SN-06.

Emissions plant-wide changed as follows: PM<sub>10</sub>/PM decreased by 30.0 tpy.

### Process Description

Raw materials used at this site are dimensioned pine lumber, laminating glue and glue additives. Lumber is brought into the plant and unloaded in the raw materials storage building.

The first step in the assembly of the laminated beams is grading for beam lay-up and measuring for moisture content. Boards are moved by forklift to the grading building where they are graded and cut to length. To ensure a quality product, boards must have a moisture content of 16 percent or less. Boards with moisture content greater than 16 percent are sent to the kiln for drying and then retested. Approximately 30 percent of the lumber is sent to the kiln before processing. Emissions from the kiln are designated SN-01, which has been determined to be insignificant.

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The boards are then routed to the laminating building. Finger joints are cut in the ends of the board. Glue is applied to the finger joints and boards are joined together end to end. The resulting boards are cut to desired length. The boards are conveyed from the finger joint station to the glue station. Here boards are glued to one another to produce a beam of the desired thickness and width. The beam is placed in a Raybond press to hold it together and cure it. Excess glue from the finger joining operation is allowed to drip onto paper sheeting, which is then rolled up and placed in waste containers. Depending on which brand of glue is being used in the laminating process, the excess glue from the beam laminating process is either collected in a catch basin and recycled back to the glue reservoir, or it is collected in a five-gallon container and allowed to solidify. Fugitive emissions from gluing operations are designated SN-04.

Once the glue has dried, the beam is run through a planer to produce a clean, smooth surface and it is then trimmed to length. Cuttings from the grading and laminating process are ground to produce a marketable product and sold. Emissions from the grinding process are routed to the facility's cyclone system, SN-02 and SN-03.

Sawdust, sander dust, and shavings from the cutting and planing operations are conveyed to storage instead of being processed through the grinder. Emissions from the grinding process have been routed to the Cyclone (SN-09). Fugitive particulate emissions from loadout operations and the grinder are designated SN-05.

After planing and trimming, the dimensioned and surfaced beams are transferred to the finish building where they are covered with protective waterproof paper wrapping and marked with dimensions and destination. Finished beams are stored in the finish building, the grading building, and outside in the area south of the lamination building.

Repair and maintenance of equipment and vehicles are provided in a shop building. Floors are cleaned up with dry floor sweep. Materials from floor cleaning are transported to solid waste containers. Used oil is collected and returned to the dealer for recycling. Fuel for vehicles is stored in one diesel and one gasoline tank. The gasoline tank has been assigned vent designation SN-06; the diesel tank has been assigned vent SN-07. SN-07 has been designated insignificant according to item A-3 of the insignificant activities list in Regulation 19.

### 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 9, 2012
40 CFR Part 63, Subpart CCCCCC – <i>National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities</i>



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### 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	25.9	63.2
PM <sub>10</sub>	25.9	63.2
VOC	54.6	50.4
Acetaldehyde	5.0	9.5
Ethylene Glycol	11.0	9.5
Formaldehyde	5.4	5.4
MIBK	22.5	9.5
Methanol	28.8	9.5
Phenol	5.7	9.3
Total HAP	--	23.5

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### Section III: PERMIT HISTORY

The first permit, 1675-A, was issued to this facility on August 6, 1996.

On November 18, 1997, a draft version of 1675-AR-1 was issued. This permit increased production and added a new glue formulation. Comments on this draft included a request that the permit be permitted as a Regulation 18 permit. A second draft was issued in May, 1998. No additional comments were submitted. On June 29, 1998, permit 1675-AR-1 was finalized.

1675-AR-2 allowed an increase in production as well as allowed a new glue formulation to be used. The permit was issued on May 21, 2000.

1675-AR-3 covered a slight increase in particulate emissions due to the addition of a hog (SN-05), which processed trimmings that were previously disposed of offsite. A new glue was used at the facility in keeping with Specific Condition 8. The permit was issued on December 4, 2000.

1675-AR-4 allowed the installation of a new wood by-product transfer cyclone, SN-09. Emissions from the hogging process were routed to this new source. Sawdust, sander dust, and shavings from the cutting and planing operations are conveyed to storage instead of being processed through the hammer hog. The permit was issued April 17, 2001.

1675-AR-5 allowed an alternate compliance mechanism for the Glueing Operations (SN-04). Previously a condition limited the glue HAPs on a content basis. This modification allowed the permittee to track HAP emissions and verify on a monthly basis compliance with SN-04 emission limits. Emission changes were also allowed at SN-04 with this modification. Some HAP ton per year limits were increased to a maximum of 9.5 tons per year and acetaldehyde, a HAP that was previously not permitted, was included at the source. Total HAPs were limited to 23.5 tons per year. Various pound per hour limits were also increased. The permit was issued September 28, 2004.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- 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
02	Lamination Building Baghouse	PM <sub>10</sub>	5.8	25.2
03	Specialty Products Building Baghouse	PM <sub>10</sub>	5.2	22.5
04	Gluing Operations	VOC	50.0	50.0
05	Loadout Operations	PM <sub>10</sub>	13.7	13.7
06	Gasoline Storage Tank	VOC	4.6	0.4
09	Cyclone	PM <sub>10</sub>	1.2	1.8

- 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
02	Lamination Building Baghouse	PM	5.8	25.2
03	Specialty Products Building Baghouse	PM	5.2	22.5
04	Gluing Operations	Acetaldehyde	5.0	9.5
		Ethylene Glycol	11.0	9.5
		Formaldehyde	5.4	5.4
		MIBK	22.5	9.5
		Methanol	28.8	9.5
		Phenol	5.7	9.3
		Total HAPs	--	23.5
05	Loadout Operations	PM	13.7	13.7
09	Cyclone	PM	1.2	1.8

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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 §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
02	5%	§18.501 and A. C. A.
03	5%	§18.501 and A. C. A.
05	20%	§19.503 and A. C. A.
09	10%	§18.501 and A. C. A.

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 §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 §8-4-304 and §8-4-311]
6. The permittee shall not process more than 54,750,000 board feet of product at the facility in any rolling 12-month period. [§19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee shall maintain monthly records 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. A twelve month rolling total and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request. [§19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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8. The permittee shall maintain monthly calculations based on a mass balance of actual glue usage and amount of each type of glue used in order to demonstrate compliance with SN-04 pound per hour and ton per year HAP limits listed in Specific Condition 2. A rolling twelve-month total of each HAP emission will be used to determine compliance with the annual limits. A rolling twelve-month total of all HAPs will be used to determine compliance with the 23.5 ton per year cap on all HAPs. When the calculations are updated each month, the actual hours of lamination operating hours from that month will be used to calculate the monthly average pound per hour to determine compliance with the pound per hour limits. Records shall be updated by the fifteenth day of the month following the month to which the records pertain, shall be kept on-site, and shall be made available to Department personnel upon request. [§18.1004 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 operate the equipment whose emissions are controlled by the Cyclone (SN-09) more than 8 hours per day and 2,920 hours per year. The Cyclone (SN-09) shall be operated whenever the equipment it controls is also operated. [§18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee shall maintain daily records which demonstrate compliance with Specific Condition 9. These records shall be kept on site, and shall be made available to Department personnel upon request. [§18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
11. The permittee shall not process more than 50,000 gallons of gasoline at the facility in any rolling 12 month period. [§19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
12. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition 10. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request. [§19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

#### NESHAP CCCCCC Conditions

13. The permittee is subject to and shall comply with the applicable provisions of 40 CFR Part 63, Subpart CCCCCC – *National Emission standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities* (Appendix C). *Gasoline dispensing facility (GDF)* is defined in §63.11132 as any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, non-road vehicle, or non-road engine, including a non-road vehicle or non-road engine used solely for competition. The facility, an area source, is a GDF. SN-06 is an existing affected source to which this subpart applies. The permittee must comply with the standards in 40 CFR 63 Subpart

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CCCCCC no later than January 10, 2011. [40 CFR 63 Subpart CCCCCC and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

14. The permittee shall not exceed a throughput of 10,000 gallons of gasoline per individual month. [40 CFR 63 Subpart CCCCCC and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. The permittee shall maintain documentation (e.g., purchase orders or receipts) and monthly records which 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 monthly data shall be maintained on-site and made available to Department personnel upon request. Records shall be kept for a period of five years. [40 CFR 63 Subpart CCCCCC and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
16. The permittee must comply with the requirements in §63.11116 because it has a monthly throughput of less than 10,000 gallons of gasoline. Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline are as follows:
  - a. The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
    - i. Minimize gasoline spills;
    - ii. Clean up spills as expeditiously as practicable;
    - iii. Cover all open gasoline containers and all gasoline storage tanks fill-pipes with a gasketed seal when not in use; and
    - iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
  - b. The permittee is not required to submit notifications or reports as specified in §63.11125, §63.11126, or subpart A of Part 63, but the permittee must have records available within 24 hours of a request by the Department to document your gasoline throughput.
  - c. The permittee must comply with the requirements of 40 CFR 63 Subpart CCCCCC by the applicable dates specified in §63.11113.
  - d. Portable gasoline containers that meet the requirements of 40 CFR Part 59, subpart F, are considered acceptable for compliance with this. [40 CFR 63 Subpart CCCCCC 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 September 25, 1998.

Description	Category
SN-01 Dry Kiln (3 MMBTU/hr)	A-1
SN-07 Diesel Storage Tank	A-3

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## 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

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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]