

# ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1966-A

IS ISSUED TO:

Van Buren Bridge Company  
600 South 28<sup>th</sup> Street  
Van Buren, AR 72956  
Crawford County  
CSN: 17-0016

THIS PERMIT IS YOUR 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 YOUR 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:

\_\_\_\_\_  
Keith A. Michaels

\_\_\_\_\_  
Date

## SECTION I: FACILITY INFORMATION

PERMITTEE: Van Buren Bridge Company  
CSN: 17-0016  
PERMIT NUMBER: 1966-A

FACILITY ADDRESS: 600 South 28<sup>th</sup> Street  
Van Buren, AR 72956

COUNTY: Crawford

CONTACT POSITION: Plant Manager  
TELEPHONE NUMBER: (501) 474-1975

REVIEWING ENGINEER: Nancy Spencer Rogers

UTM North-South (Y): 3921.1  
UTM East-West (X): 379.1

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## **SECTION II: INTRODUCTION**

### **Summary**

Van Buren Bridge Company located at 600 South 28<sup>th</sup> Street, Van Buren, Crawford County, Arkansas, manufactures structural steel members. The facility was purchased from the Fort Smith Structural Steel Company. This is the initial air permit for the facility.

### **Process Description**

Raw steel is cut and formed into structural steel members. Two shotblasters with baghouses (SN-02, SN-03) are used to surface treat the metal surfaces. The capacity of the baghouses is 7600 cfm (SN-02) and 17,200 cfm (SN-04). After treatment, the steel members proceed to the spray painting operations (SN-01). There, they are surface coated by four hand held spray guns (hourly flow rate of each gun 0.46 gal/min). Finished steel members are shipped to customers.

### **Regulations**

The facility is subject to regulations under the *Arkansas Pollution Control Code* (Air Code) and the regulations of the *Arkansas Plan of Implementation for Air Pollution Control* (SIP).

The following table is a summary of the facility's total emissions.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	4.3	18.7
PM <sub>10</sub>	4.3	18.7
VOC	248.4	50.0
Total HAP	248.4	22.5
Single HAP	248.4	9.0

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### **SECTION III: PERMIT HISTORY**

Permit #1966-A is the initial air permit for this facility.

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**SECTION IV: EMISSION UNIT INFORMATION**

**Specific Conditions**

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
01	Spray Painting Operations	VOC	248.4	50.0
02	Wheelbrator Shotblaster (Baghouse)	PM <sub>10</sub>	1.3	5.7
03	Pangborn Shotblaster (Baghouse)	PM <sub>10</sub>	3.0	13.0

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
01	Spray Painting Operations	Total HAP	284.4	22.5
		Single HAP	284.4	9.0
02	Wheelbrator Shotblaster (Baghouse)	PM	1.3	5.7
03	Pangborn Shotblaster (Baghouse)	PM	3.0	13.0

3. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
01	10%	§ 18.501
02	10%	

4. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause or permit the emission of air contaminants,

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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.

5. Pursuant to §18.901 of Regulation 18, 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.
6. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 883.2 gallons of coatings at the facility per day.
7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain daily records which demonstrate compliance with Specific Condition #6. These records shall be kept on site, and shall be made available to Department personnel upon request.
8. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the VOC content for any coating product used in the Spray Painting Operations (SN-01) as outlined in the following table.

Product	VOC Content (lb/gal)
All coatings	6.75 lb/gal

9. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the HAP content for any coating product used in the Spray Painting Operations (SN-01) as outlined in the following table.

Minimum HAP TLV (mg/m <sup>3</sup> )	Maximum Individual HAP Content (lb/gal)
944.0	6.75
839.1	6.0
699.3	5.0
559.4	4.0
419.6	3.0
279.7	2.0

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Minimum HAP TLV (mg/m <sup>3</sup> )	Maximum Individual HAP Content (lb/gal)
139.9	1.0
69.3	0.5
14.0	0.1

The American Conference of Governmental Industrial Hygienists (ACGIH), “Threshold Limit Values (TLVs) and Biological Exposure Indices (BEI’s), shall be used to determine the current TLVs. The TLVs shall be updated by March 1 of every year. These substitution values shall be documented, maintained on site, and provided to Department personnel upon request and may be used by the Department for enforcement purposes.

10. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, records of the monthly VOC emissions shall be recorded in the format of Table A in Appendix A or equivalent. 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.
11. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, records of the monthly HAP emissions shall be recorded in the format of Table B in Appendix B or equivalent. 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.

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#### **SECTION V: INSIGNIFICANT ACTIVITIES**

The following types of activities or emissions are deemed 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 October 24, 2000.

**No activities were submitted.**



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## **SECTION VI: GENERAL CONDITIONS**

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall 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 thereunder.
3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §19.705 of Regulation 19 and/or §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, records must be kept for five years which will 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 records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

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6. Pursuant to §19.705 of Regulation 19 and/or §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, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
Post Office Box 8913  
Little Rock, AR 72219

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
  - a. Sampling ports adequate for applicable test methods
  - b. Safe sampling platforms
  - c. Safe access to sampling platforms
  - d. Utilities for sampling and testing equipment
9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall 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:
  - 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 that all reasonable measures have been taken 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 shall 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, it need not be submitted again.
  
11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
  - 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
  - e. To perform an operation and maintenance inspection of the permitted source

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12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued 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.
13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall 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. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.

## **APPENDIX A**

## **APPENDIX B**

## **APPENDIX C**

# INVOICE REQUEST FORM

PDS-\_\_\_\_\_

Date October 12, 2001

<input checked="" type="checkbox"/>	Air
<input type="checkbox"/>	NPDES
<input type="checkbox"/>	Stormwater
<input type="checkbox"/>	State Permits Branch
<input type="checkbox"/>	Solid Waste

CSN 17-0016

Facility Name Van Buren Bridge Company

Invoice Mailing Address PO Box 231

Little Rock, Arkansas 72203-0231

<input checked="" type="checkbox"/>	Initial
<input type="checkbox"/>	Modification
<input type="checkbox"/>	Annual

Permit Number 1966-A

Permit Description Minor Source

Permit Fee Code A

Amount Due \$ 956.00

Engineer Nancy Spencer Rogers

Paid? GNo GYes Check # \_\_\_\_\_

Comments: Air Permit Fee Calculation



## Public Notice

Pursuant to A.C.A. §8-4-203, and the regulations promulgated thereunder, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Van Buren Bridge Company (CSN: 17-0016) located at 600 South 28<sup>th</sup> Street, Van Buren, Crawford County, Arkansas, manufactures structural steel members. The facility was purchased from the Fort Smith Structural Steel Company. This is the initial minor source air permit for the facility.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Suzanne Carswell, Information Officer. Citizens desiring technical information concerning the application or permit should contact Nancy Spencer Rogers, Engineer. Both Suzanne Carswell and Nancy Spencer Rogers can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Fort Smith Public Library, 61 South Eighth, Fort Smith, Arkansas, 72901. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Suzanne Carswell. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8).

Dated this

Richard A. Weiss  
Interim Director