

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation No. 26:

Permit No. : 2111-AOP-R0

IS ISSUED TO:

Crane Composites, Inc.

Jonesboro, AR 72401

Craighead County

AFIN: 16-00222

**THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO
INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION
UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE
FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:**

July 26, 2006 AND July 25, 2011

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates
Chief, Air Division

July 26, 2006

Date

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Table 1 - List of Acronyms

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
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate matter
PM ₁₀	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur dioxide
SSMP	Startup, Shutdown, and Malfunction Plan
tpy	ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: Crane Composites, Inc.

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PERMIT NUMBER: 2111-AOP-R0

FACILITY ADDRESS: 8500 CW Post Road
Jonesboro, AR 72401

MAILING ADDRESS: 8500 CW Post Road
Jonesboro, AR 72401

COUNTY: Craighead County

CONTACT POSITION: Debra Ainley, Safety Coordinator

TELEPHONE NUMBER: 870-933-5302

REVIEWING ENGINEER: Charles Hurt

UTM Zone: 15

UTM North - South (Y): 719.10

UTM East - West (X): 3965.30

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Section II: INTRODUCTION

Summary of Permit Activity

Crane Composites, Inc. (Crane), formerly Kemlite, operates a facility located at 8500 CW Post Road, Jonesboro, Arkansas 72401. Crane produces reinforced plastic composite panels made with fiberglass reinforcement in a thermoset polymer resin matrix. This is the first permit issued to Crane Composite, Inc. – Jonesboro under the Title V Operating Air Permit Program. Styrene accounts for approximately 95% of VOC emissions. Crane is permitted to emit 1.7 tpy PM/PM₁₀, 0.1 tpy SO₂, 36.1 tpy VOC, 7.5 tpy CO, 9.2 tpy NO_x, and 35.96 tpy HAP.

Process Description

The Jonesboro facility operates two wide production lines (Line 5 and Line 8). Gel coat (a coating resin) and core resin (a body resin) are the two main types of resin applied at the lines. Raw resin material is received by trucks, and it is stored in nine aboveground tanks located inside the building. Each tank has a capacity of approximately 12,000 gallons. The tanks vent to the atmosphere during filling/emptying and for safety purposes.

The resin is piped directly into the resin room to be blended or mixed with other ingredients such as powdered filler material in batching tanks. The batching tanks and carts used in the mixing room are discharged to the atmosphere through the Mixing Room ventilation system (SN-08). Carts and tanks are kept covered or closed to minimize emissions.

Filler is delivered by truck and unladed into the silo using a blower and bin vent filter combination (SN-02), with the discharge air vented to the atmosphere. The filler is transferred to the mix room on demand, directly to a filter/receiver at each batch/mix tank. Discharge air from each of the filter/receivers is vented through a common vent (SN-07) to the atmosphere. Pigments, promoters, and peroxide initiators may be added during the mixing operation, or injected at the line just prior to introduction onto the production line.

At the upstream ‘wet end’ of the production line, activated resin mix is pumped onto a carrier polyester film and spread into a thin layer by doctor blade. Chopped or woven fiberglass or nylon fibers are then applied and squeezed into the resin layer as it moves downstream. The resulting resin/fiberglass composition is then “sandwiched” by an upper layer of polyester film. The polyester film, both top and bottom, is used to contain the resin/fiberglass laminate and suppress volatile emission while it is in a liquid state. The wet end of the production line is vented to the RTO (SN-01).

For some products, a thin gel coat is applied to the upper film for extended weathering on the side of the panel that will be exposed to the elements. The gel coat is partially cured by passing through a series of ovens before the top film is inverted to sandwich the gel coat/core resin/fiberglass composite laminate. The gel coat dispensing and ovens are vented to the RTO.

From the wet end, the laminate composition passes through two sets of natural gas-fired ovens, where curing by an exothermal process continues to harden the resin/fiberglass combination.

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The first set is the gel oven, and the second set is the cure oven. The ovens are vented to the RTO. Depending upon whether flat or corrugated product is being manufactured, the product passes over forming shoes (for corrugated products) or pulled by edge rollers (for flat products), which are located in the upstream ovens. Heat is carefully controlled in each of the oven zones to maintain the desired panel shape and curing rate.

After exiting the curing oven, the rigid laminate panel passes through a cooling station to lower the temperature and prevent dulling of the surface appearance when the upper and lower polyester films are removed at the rewind stations. Finished laminate is then trimmed to the correct width using fluid jet cutters and cut to length as specified by the customers using a cross-cut fluid jet shear. Fluid jet cutters do not create airborne particulate emissions. Finally, the panel is inspected, then stacked on skids or rolled into coils, banded, and processed for shipment.

VOCs that are emitted from the gel coating, wet ends, and ovens are collected and passed through the RTO to be destroyed. The RTO is designed to destroy VOCs by raising the temperature of the contaminated gas stream to achieve at least 95% destruction at 1,400 °F.

Regulations

The following table contains the regulations applicable to this permit.

Table 2 – Regulations

Source No.	Regulation Citations
Facility	Regulation 18, <i>Arkansas Air Pollution Control Code</i>
Facility	Regulation 19, <i>Regulations of the Arkansas Plan of Implementation for Air Pollution Control</i>
Facility	Regulation 26, <i>Regulations of the Arkansas Operating Air Permit Program</i>
Facility*	40 CFR Part 63, Subpart WWWW – <i>National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production</i>
SN-01	40 CFR Part 63, Subpart SS – <i>National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process</i>

* Subpart WWWW specifically references 40 CFR 63, Subpart SS.

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The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

Table 3 – Emission Summary

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	0.4	1.7	N/A
		PM ₁₀	0.4	1.7	
		SO ₂	0.1	0.1	
		VOC	8.5	36.1	
		CO	1.7	7.5	
		NO _x	2.1	9.2	
Total Allowable Hazardous Air Pollutant Emissions		HAP*	8.39	35.96	N/A
01	RTO (95 % VOC Destruction)	PM/PM ₁₀	0.2	0.9	10
		SO ₂	0.1	0.1	
		VOC	8.2	35.1	
		CO	1.7	7.5	
		NO _x	2.1	9.2	
		HAP	8.15	35.03	
02	Filler Silo Vent (Fabric Filter 99.9%)	PM/PM ₁₀	0.1	0.4	15
07	Mix Room Filer Vent (Fabric Filter 99.9%)	PM/PM ₁₀	0.1	0.4	15
08	Mixing and Storage Tanks	VOC	0.3	1.0	17
		HAP	0.24	0.93	

* HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

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Section III:PERMIT HISTORY

This is the first permit issued to Crane Composites, Inc.

Section IV: SPECIFIC CONDITIONS

SN-01

Regenerative Thermal Oxidizer (RTO)

Description

VOC that is emitted from the production lines is collected and passed through the RTO to be destroyed. The VOC capture system is a permanent total enclosure (PTE), and it is designed to capture 100% of the VOC emitted from gelcoating, wet ends, and ovens. Through the RTO and the PTE, an overall control efficiency of 95% is achieved. The VOC emission from the RTO is approximately 95% styrene, and the remaining 5% of VOC are methyl methacrylate, vinyl acetate, xylene, ethyl benzene, and 2-phenoxyethanol, in decreasing amounts.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through performance testing for VOC and compliance with Specific Condition #4. Compliance with PM₁₀, SO₂, CO, and NO_x emission limits is inherent based on the equipment's maximum natural gas combustion rate. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 4 – RTO Maximum Criteria Emission Limit

Pollutant	lb/hr	tpy
PM ₁₀	0.2	0.9
SO ₂	0.1	0.1
VOC	8.2	35.1
CO	1.7	7.5
NO _x	2.1	9.2

2. The permittee shall not exceed the emission rates set forth in the following table. Compliance with the PM emission limit is inherent based on the equipment's maximum natural gas combustion rate. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 5 – RTO Maximum Non-Criteria Emission Limits

Pollutant	lb/hr	tpy
PM	0.2	0.9
HAP	8.15	35.03

3. Visible emissions may not exceed 5% opacity at SN-01. The permittee will conduct weekly observations, by personnel trained but not necessarily certified in EPA Reference Method 9, and keep a record of these observations. If the permittee detects visible emissions above 5%, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the

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- permittee shall conduct a full EPA Reference Method 9 and must document the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep the records onsite and make the records available to Department personnel upon request. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
4. The maximum allowable resin throughput for the production lines (Line 5 and Line 8) controlled by SN-01 shall not exceed 105,120,000 lb of core resin with a VOC or HAP content greater than 40.9% nor shall it exceed 18,921,600 lb of gel coat resin with a VOC or HAP content greater than 25.3% per consecutive 12 month period. Resin throughputs greater than these amounts are permitted provided there is a corresponding decrease in VOC and/or HAP content. [40 CFR §70.6, Regulation No. 19 §19.705, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 5. The permittee will maintain daily records to demonstrate compliance with Specific Condition #4. The permittee will maintain a twelve month rolling total and each individual month's data shall be maintained on-site, made available to Department personnel upon request. These records shall be submitted in a semiannual report in accordance with General Provision 7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E, 40 CFR §63.5880 (c)]
 6. The permittee shall keep MSDS or equivalent information for each formula used in manufacturing including cleaning solvents. This information shall be maintained by database, spreadsheet, or other well organized format. Required data to be tracked includes formula name, type of resin (gel coat, core resin, *etc.*), composition, threshold limit value of each constituent, and raw material density. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]
 7. The permittee shall not use any material with a threshold limit value less than 5.0 mg/m³. Compliance with this condition shall be demonstrated through compliance with Specific Condition #6. [Regulation No. 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 8. The permittee shall install, operate, and maintain according to manufacturer's specifications and the requirements specified in 40 CFR Part 63, Subpart SS, a RTO with a minimum VOC destruction efficiency of 95%. The minimum VOC destruction efficiency shall be maintained at all times including periods of startup, shut down, and/or malfunction. Any deviation shall be reported to the Department in accordance with General Provision #8. [Regulation No. 19 §19.601 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 9. Any access door which is not intended to be a natural draft opening shall remain closed during production except when parts and equipment are moving through them. [Regulation No. 19 §19.303 A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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MACT Requirements

10. The permittee operates a facility that is an affect source of 40 CFR Part 63, Subpart WWWW – *National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composite Production*. The permittee is engaged in continuous lamination operations, mixing, cleaning of equipment used in reinforced plastic composites manufacture, and HAP-containing materials storage. The permittee shall comply with all applicable requirements of the subpart including but not limited to the requirements specified by Specific Conditions #11 through #18. [Regulation No. 19 §19.304 and 40 CFR §63.5790]
11. The permittee shall, through the use of an add on control device, demonstrate that a 95 percent reduction of all organic HAP emissions is achieved. The add-on control device shall be monitored and operated according to the procedures in 40 CFR Part 63, Subpart SS. [Regulation No. 19 §19.304 and 40 CFR §63.5820 (c)]
12. The permittee shall conduct initial and subsequent performance tests for SN-01 using Method 25A of Appendix A to 40 CFR Part 60 to demonstrate compliance with the limits in Specific Condition #11. The permittee shall assume all gaseous organic emissions measured as carbon are organic HAP emissions. The performance test must be conducted according to the requirements of §63.7 (e)(1), 40 CFR §63.995 (b), and paragraphs (e),(f), and (d) of §63.5850. Subsequent tests shall be conducted no later than five years after the previous test. [Regulation No. 19 §19.304 and 40 CFR §63.5850 (d)]
13. The permittee shall maintain records which demonstrate that the design and proposed operation of the permanent total enclosure meet the requirements specified in EPA Method 204 of Appendix M to 40 CFR Part 51. These records shall be kept onsite and made available to Department personnel upon request. [Regulation No. 19 §19.304 and 40 CFR §63.5875 (a)]
14. The permittee shall record daily the usage of each formula/end product combination on each line in order to determine the amount of neat resin plus and neat gel coat plus applied. This is to be recorded at each changeover in formula or product and at the end of each shift. Daily usage shall be determined using in house records which track formula usage by end product/thickness combinations. These records shall be kept on site and be made available upon request to Department personnel. [Regulation No. 19 §19.304 and 40 CFR §63.5880]
15. The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. [Regulation No. 19 §19.304 and 40 CFR §63.5805]
16. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing

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- materials storage tanks may be vented as necessary for safety. [Regulation No. 19 §19.304 and 40 CFR §63.5805]
17. The permittee shall submit an initial compliance report and, thereafter, a compliance report semiannually coinciding with the six month periods ending on June 30 and December 31 as specified in §63.5910. The reports are due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. The permittee will send the report to both EPA Region VI and ADEQ. [Regulation No. 19 §19.304 and 40 CFR §63.5910]
 18. The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) according to the provisions in §63.6 (e)(3). The SSMP shall be kept on site and be made available to Department Personnel upon request. Any deviation from the SSMP must be reported according to Table 14 of Subpart WWWW and included in the semiannual report for the reporting period the deviation occurred. [Regulation No. 19 §19.304 and 40 CFR §63.5835 (d)]
 19. The permittee is an affected source of 40 CFR Part 63, Subpart SS – *National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process* because it is subject to 40 CFR Part 63, Subpart WWWW which specifically references the subpart. The permittee shall comply with all applicable requirements of the subpart including but not limited to the requirements specified by Specific Conditions #20 through #24. [Regulation No. 19 §19.304 and 40 CFR §63.980]
 20. The permittee shall perform an initial inspection of the permanent total enclosure for leaks immediately after startup. The initial inspection and subsequent annual inspections shall be performed while the permanent total enclosure is in service according to the procedures specified in §63.983 (c). The permittee shall conduct such inspections according to EPA Method 21 of 40 CFR Part 60, Appendix A. [Regulation No. 19 §19.304 and 40 CFR §63.983]
 21. Records of the inspections required in Specific Condition #20 shall be generated and must contain the information specified in §63.998 (d)(1). The records shall be kept on site and made upon request. [Regulation No. 19 §19.304 and 40 CFR §63.983]
 22. The permittee shall install, calibrate, operate, and maintain according to manufacturer's specification, a continuous parameter monitoring system (CPMS) to monitor the temperature of the combustion chamber of the RTO. [Regulation No. 19 §19.304 and 40 CFR §63.996 (c)]
 23. The CPMS shall measure the temperature at least once every 15 minutes and record the measurements according to the requirements of §63.998 (b) and §63.998 (c). [Regulation No. 19 §19.304 and 40 CFR §63.998].

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24. The permittee shall submit all notifications and reports required by §63.999. [Regulation No. 19 §19.304 and 40 CFR §63.997 (e)(2)(iii)(C)]

SN-02 and SN-07

Filler Silo and Baghouse

Description

Filler is delivered by truck and unladed into the silo using a blower and bin vent filter combination (SN-02), with the discharge air vented to the atmosphere. The filler is transferred to the mix room on demand, directly to a filter/receiver at each batch/mix tank. Discharge air from each of the filter/receivers is vented through a common vent (SN-07) to the atmosphere. Pigments, promoters, and peroxide initiators may be added during the mixing operation, or injected at the line just prior to introduction onto the production line.

Specific Conditions

25. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through recordkeeping of filler throughput. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 7 – Maximum Criteria Emission Limits

Source Number	Pollutant	lb/hr	tpy
02	PM ₁₀	0.1	0.4
07	PM ₁₀	0.1	0.4

26. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through recordkeeping of filler throughput. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 8 – Maximum Non-Criteria Emission Limits

Source Number	Pollutant	lb/hr	tpy
02	PM	0.1	0.4
07	PM	0.1	0.4

27. The permittee shall not receive more than 2,100 tons of filler per consecutive 12-month period. [40 CFR §70.6, Regulation No. 19 §19.705, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
28. The permittee will maintain monthly records to demonstrate compliance with Specific Condition #27. The permittee will maintain a twelve month rolling total and each individual month's data shall be maintained on-site, made available to Department personnel upon request. These records shall be submitted in a semiannual report in accordance with General Provision 7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

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29. Visible emissions may not exceed 5% opacity at SN-02 and SN-07. The permittee will conduct monthly observations while the fabric filters are in service, by personnel trained but not necessarily certified in EPA Reference Method 9, and keep a record of these observations. If the permittee detects visible emissions above 5%, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee shall conduct a full EPA Reference Method 9 and must document the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep the records onsite and make the records available to Department personnel upon request. [Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SN-08

Mixing and Storage Tanks

Description

The resin is piped directly into the resin room to be blended or mixed with other ingredients such as powdered filler material in batching tanks. The batching tanks and carts used in the mixing room are discharged to the atmosphere through the Mixing Room ventilation system (SN-08). Carts and tanks are kept covered or closed to minimize emissions.

There are nineteen above ground tanks, and they are located indoors. Listed below are the tanks, their service, and capacity.

Tank	Service	Capacity (gallons)
Batch No. 1	Mixing tank for core resin for Line 8	12,000
Batch No. 2	Mixing tank for core resin for Line 8	12,000
Gel Coat	Storage tank for gel resin	12,000
Tank 1	Storage tank for core resin	12,000
Tank 2	Storage tank for core resin	12,000
Tank 3	Storage tank for core resin	12,000
Tank 4	Storage tank for core resin	12,000
Tank 5	Storage tank for core resin	12,000
Tank 7	Storage tank for styrene	12,000
Mix Tank 1	Mixing tank for core resin for Line 5	1,000
Mix Tank 2	Mixing tank for core resin for Line 5	1,000
Core Hold 1	Holding tank for core resin for Line 5	500
Core Hold 2	Holding tank for core resin for Line 5	500
Core Hold 3	Holding tank for core resin for Line 5	500
Core Hold 4	Holding tank for core resin for Line 5	500
Gel Hold 1	Holding tank for gel resin	500
Gel Hold 2	Holding tank for gel resin	500
Gel Hold 3	Holding tank for gel resin	500
Gel Hold 4	Holding tank for gel resin	500

Specific Conditions

30. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Specific Conditions #4 and #32. [Regulation No. 19 §19.501 *et seq.* effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Table 9 – Mixing and Storage Tank Maximum Criteria Emission Limits

Pollutant	lb/hr	tpy
VOC	0.3	1.0

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31. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition through compliance with Specific Conditions #4 and #32. [Regulation No. 18 §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 10 – Mixing and Storage Tank Maximum Non-Criteria Emission Limits

Pollutant	lb/hr	tpy
HAP	0.24	0.94

* HAPs included in the VOC totals.

32. The permittee shall not receive at the facility more than 504,000 gallons of styrene per consecutive 12-month period. Raw materials, as received, which contain styrene as a solvent do not count towards this limit. [40 CFR §70.6, Regulation No. 19 §19.705, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
33. The permittee will maintain monthly records to demonstrate compliance with Specific Condition #32. The permittee will maintain a twelve month rolling total and each individual month's data shall be maintained on-site, made available to Department personnel upon request. These records shall be submitted in a semiannual report in accordance with General Provision 7. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

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Section V: COMPLIANCE PLAN AND SCHEDULE

Crane Composites, Inc. will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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Section VI: PLANT WIDE CONDITIONS

1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No. 19 §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must 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) New Equipment or newly 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) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. 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 will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No. 19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation No. 19 §19.702 and/or Regulation No. 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; and
 - d. Utilities for sampling and testing equipment.
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No. 19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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Title VI Provisions

7. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
 - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
8. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
9. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

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10. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

11. The permittee can switch from any ozone-depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

Permit Shield

12. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in Table 11 - Applicable Regulations of this condition.
 - a. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated .

Table 11 - Applicable Regulations

Source No.	Regulation	Description
Facility	Regulation No. 19	Regulations of the Arkansas Plan of Implementation for Air Pollution Control
Facility	Regulation No. 26	Regulations of the Arkansas Operating Air Permit Program
Facility*	40 CFR Part 63, Subpart WWWW	National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
SN-01	40 CFR Part 63, Subpart SS	National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process

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Section VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated **12/29/2005**.

Table 9 - Insignificant Activities

Description	Category
Diesel Storage Tank, 300 gallon	A #3
Lab Hood, One	A #5

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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Section VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 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.[40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective September 26, 2002]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation No. 26 §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and

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- f. The operating conditions existing at the time of sampling or measurement.
- 6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]
- 7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26 §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26]

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

- 8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location,
 - ii. The process unit or emission source deviating from the permit limit,
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs,
 - iv. The date and time the deviation started,
 - v. The duration of the deviation,
 - vi. The average emissions during the deviation,
 - vii. The probable cause of such deviations,

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- viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
- ix. The name of the person submitting the report.

The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

- b. For all deviations, the permittee will report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a. above. The semi-annual report must include all the information as required in the initial and full report required in 8a. [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]
9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]
 10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]
 11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]
 12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]

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13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]
14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]
17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;

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- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]
- e. The identification of each term or condition of the permit that is the basis of the certification;
 - f. The compliance status;
 - g. Whether compliance was continuous or intermittent;
 - h. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - i. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
22. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]
- j. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - k. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - l. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,
 - m. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

APPENDIX A

***40 CFR Part 63, Subpart WWWW – National Emission Standards for Hazardous Air
Pollutants: Reinforced Plastic Composites Production***

APPENDIX B

40 CFR Part 63, Subpart SS – National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process

APPENDIX C

APPENDIX D