

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. : 2132-AOP-R0
IS ISSUED TO:
Drew Foam Companies, Inc.
1093 Highway 278 East
Monticello, AR 71655
Drew County
AFIN: 22-00057

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:

AND

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates
Chief, Air Division

Date

Drew Foam Companies, Inc.

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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
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
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Drew Foam Companies, Inc.

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PERMIT NUMBER: 2132-AOP-R0

FACILITY ADDRESS: 1093 Highway 278 East
Monticello, AR 71655

MAILING ADDRESS: 1093 Highway 278 East
Monticello, Arkansas 71655

COUNTY: Drew

CONTACT POSITION: Steve Pigott

TELEPHONE NUMBER: (870) 723-4375

REVIEWING ENGINEER: Wesley Crouch

UTM North South (Y): Zone 15: 611.26

UTM East West (X): Zone 15: 3743.22

SECTION II: INTRODUCTION

Summary of Permit Activity

Drew Foam Companies, Inc., has purchased a manufacturing facility located at 1093, Highway 278 East and plans to install new production equipment. Drew will install and operate a new expander, molder, backup boiler, drying oven, and hot melt glue lamination process. This modification will allow the facility to comply with a plantwide VOC limit through mass balance and recordkeeping. The maximum allowable pentane content in the beads has been raised to 6.8%. The permitted emission rates are 0.9 tpy PM/PM₁₀, 0.3 tpy SO₂, 245.35 tpy VOC, 7.0 tpy CO and 8.1 tpy NO_x.

Process Description

Polystyrene beads are delivered by truck to the bead storage area (SN-01) in supersacks. Drew Foam receives approximately 43,000 pounds of beads per shipment. The beads contain maximum pentane contents by weight of 6.8%.

The stored polystyrene beads are dumped from the shipping container into a transfer hopper and augured into the expander (SN-02). Low pressure steam is used to expand the beads to a desired density before they are dried with ambient air in a fluidized bed. The dried beads are routed from the bed dryer to storage bags (SN-03) through a transfer piping system. The beads are cured in the storage bags for up to three days.

The transfer piping system is used to convey the expanded polystyrene beads from the storage bags to the mold (SN-04). Low pressure steam is used to fuse the beads into a 37" x 50" x 288" billet.

The billets are transferred from the mold to the billet drying/storage area (SN-05). In this area the billets are either dried by radiant heat generated from the natural gas boilers (SN-08 and SN-10) or by ambient air. The billets are typically dried for two to three days prior to processing.

The dried billets are moved from the storage area to various cutting machinery (SN-06), which consists of high resistance electrical wires and band saws. The machinery sizes the product to fulfill customer specifications. Billets, which do not meet customer demands, and scrap billet pieces generated from processing activities are sent to a grinder (SN-06). The grinder cuts the off-specification material and scrap into small pieces (i.e., regrind material) for recovery and reuse. The regrind material is conveyed through the transfer piping system to a bag storage area (SN-07).

The facility employs a primary natural gas boiler (SN-10), rates at 10.5 MMBtu/hr to supply steam to the expander, mold and radiant drying operations. The facility is also equipped with a backup natural gas fired boiler rates at 77.9 MMBtu/hr (SN-11). The backup boiler is only operated when the primary unit is down for maintenance or repairs.

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The facility is also equipped with a small natural gas fired drying oven (SN-12) that is used as a drying system for the non-regulated base coating operation. This oven is rated at less than 1.0 MMBtu/hr.

Drew Foam uses hot melt adhesives to apply decorative surface material to its foam substrates (SN-13).

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective May 28, 2006
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
40 CFR Part 60, Subpart Dc – <i>Standards of Performance for Small Industrial Commercial Institutional Steam Generating Units</i>

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	0.8	0.9
		PM ₁₀	0.8	0.9
		SO ₂	0.3	0.3
		VOC	293.2	245.35
		CO	7.5	7.0
		NO _x	8.9	8.1

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SN	Description	Pollutant	lb/hr	tpy
01 03 05 06 07 14	Polystyrene Bead Storage EPS Bead Storage Billet Drying/Storage Billet Processing Regrind Storage Finished Product Storage	VOC	5.7	245.35*
02	Expander	VOC	286.6	
04	Molder			
13	Laminator	VOC	0.2	
10	Primary Boiler (10.5 MMBtu/hr)	PM	0.1	0.3
		PM ₁₀	0.1	0.3
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.9	2.3
		NO _x	1.1	2.7
11	Backup Boiler (77MMBtu/hr)	PM	0.6	0.5
		PM ₁₀	0.6	0.5
		SO ₂	0.1	0.1
		VOC	0.5	0.4
		CO	6.5	4.6
		NO _x	7.7	5.5
12	Drying Oven (0.2 MMBtu/hr)	PM	0.1	0.1
		PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.1
		NO _x	0.1	0.1

*Plantwide VOC limit.

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SECTION III: PERMIT HISTORY

This is the initial permit for this facility.

SECTION IV: SPECIFIC CONDITIONS

SN-01, 03, 05, 06, 07 and 14

Polystyrene Bead Storage, EPS Bead Storage, Billet Drying/Storage, Billet Processing, Regrind Storage, and Finished Product Storage

Source Description

Approximately 43,000 pounds per shipment of virgin polystyrene beads are received and situated at the bead storage area (SN-01).

Beads are routed from the bed dryer to storage bags (SN-03) through a transfer piping system. The beads are cured in storage bags up to three days.

The billets are transferred from the mold to the billet storage area (SN-05). The billets are either dried by radiant heat from the natural gas boilers or ambient air. The billets are typically dried for two to three days before being processed.

The billets are moved from the storage area to various cutting machinery (high resistance electrical wires or band saws) where the product is sized to customer specifications (SN-06). Billets that do not meet customer specifications and pieces of billets cut to meet consumer demands are processed through a grinder which cuts the material into small pieces. The regrinds material is recovered and reused.

Regrind material is conveyed through a transfer piping system to a bag storage area (SN-07). The material is reused to produce billets which meet customer specifications.

Products that meet specification are stored until they are shipped to the customer (SN-14).

Drew Foam estimates that the following percentages of plantwide pentane emissions are emitted at these sources 1% at SN-01, 3% at SN-03, 4% at SN-05, 1% at SN-06, 1% at SN-07 and 1% at SN-14.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Conditions 7 and 8. [Regulation 19, §19.501 et seq., effective May 28, 2006 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	5.7	245.35*

* Plantwide VOC limit

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SN-02 and 04
Expander and Molding Operation

Source Description

Stored polystyrene beads are dumped from shipment containers into a transfer hopper and augured in to the expander. Low pressure steam is used to expand the beads to a desired density before they are dried with ambient air in fluidized bed. The dried beads are routed from the bed dryer to storage bags through a transfer piping system.

An estimated 80% of plantwide pentane emissions are emitted as non stack emissions from the expander (SN-02).

Expanded polystyrene beads are routed from the storage bags through a transfer piping system to the mold. Low pressure steam is used to fuse the beads into a 37" x 50" x 288" billet.

An estimated 10% of plantwide pentane emissions are emitted as non stack emissions from the molding operation (SN-04).

Specific Conditions

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Conditions 7 and 8. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
02 & 04	VOC	283.6	245.35*

*Plantwide VOC limit

Natural Gas Fired Sources (SN-10, 11, & 12)
Primary Boiler, Backup Boiler, & Base Coat Drying Oven

Source Description

The primary natural gas boiler (SN-10) will supply the steam required for the expander, mold, and radiant drying operations. The boiler has a maximum firing rate of 10.5 MMBTU/hr.

The facility is also equipped with a backup natural gas fired boiler rated at 77.9 MMBtu/hr (SN-11). The backup boiler is only operated when the primary unit is down for maintenance or repairs.

SN-12 is a small natural gas fired drying oven that is used as a drying system for the non-regulated base coating operation. This oven is rated at less than 1.0 MMBtu/hr.

Specific Conditions

3. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 6. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Pollutant	lb/hr	tpy
10	PM ₁₀	0.1	0.3
	SO ₂	0.1	0.1
	VOC	0.1	0.2
	CO	0.9	2.3
	NO _x	1.1	2.7
11	PM ₁₀	0.6	0.5
	SO ₂	0.1	0.1
	VOC	0.5	0.4
	CO	6.5	4.6
	NO _x	7.7	5.5
12	PM ₁₀	0.1	0.1
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.1	0.1

	NO _x	0.1	0.1
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4. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 6. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Pollutant	lb/hr	tpy
10	PM	0.1	0.3
11	PM	0.6	0.5
12	PM	0.1	0.1

5. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated through compliance with Specific Condition 6. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
10	5	Regulation 18, §18.501
11		
12		

6. The permittee shall maintain use only natural gas as fuel at these sources. [Regulation 18, §18.1004, Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR Part 70.6]
7. The Primary Boiler (SN-10) and the Backup Boiler (SN-11) are considered an affected source under 40 CFR Part 60, Subpart Dc. The permittee shall maintain records of the amount of natural gas combusted at these sources. These records shall be maintained on a monthly basis and updated by the 15th day of the month after the month which the records represent. These records shall be kept on site and be made available to Department personnel upon request. Reports of these records shall be submitted in accordance with General Provision 7. The permittee is required to maintain these records for at least two years. [Regulation 19, §19.304 and 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*]

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SN-13
Laminator

Source Description

Hot melt adhesives which contain VOC are used to apply decorative surface material to its foam substrates.

Specific Conditions

8. The permittee shall not exceed the emission rates set forth in the following table. Hourly emission rates are based on the maximum capacity of the equipment. The permittee shall demonstrate compliance with the annual rate through compliance with Plantwide Condition 8. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
VOC	0.2	245.35*

*Plantwide VOC limit

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

This is the initial permit for the Drew Foam Companies, Inc., (AFIN: 22-00057). The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall 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 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §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 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 shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; 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 shall maintain the equipment in good condition at all times. [Regulation 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 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The beads used at this facility shall not exceed a pentane content of 6.8%. [Regulation 19, §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 not exceed a plantwide VOC emission rate of 245.35 tons/yr, based upon a 12-month rolling total. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]
9. The permittee shall maintain monthly records which demonstrate compliance with Plantwide Conditions 7 and 8. The facility shall calculate the annual VOC emissions using a mass balance and shall assume all of the pentane contained in the beads received at this facility is emitted. The permittee shall maintain monthly records of the amount of polystyrene beads processed at the facility and plantwide VOC emissions. The calculations shall indicate bead usage and shall include MSDS or equivalent documentation to support pentane content limits. The records shall be updated no later than the 10th day of the month following the month which the update reflects. The records, along with supporting purchase records and MSDS sheets for all materials, shall be kept on site and made available to Department personnel upon request.

The monthly VOC records shall include a monthly emission total, as well as a twelve-month rolling total (the sum of the current month's emission totals combined with the previous eleven). The twelve month rolling total shall be the basis for compliance with the annual permitted limit.

An annual VOC emission report shall be submitted to the Department, compiled from the monthly records. The first reporting period shall end on the twelve-month anniversary date of the permit. The report shall be due within 30 days of the end of the reporting period. [Regulation 19, §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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SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated January 12, 2007.

Description	Category
Empty 300,000 gallon #6 oil tank	A, 13
250 gallon used oil tank	A, 2

SECTION VIII: GENERAL PROVISIONS

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. [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 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 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 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
 - 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 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 Regulation 26, §26.701(C)(3)(a)]

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

8. The permittee shall 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, § 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,
 - 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 shall 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 shall 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 by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

- 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), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §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 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 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 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 26, §26.701(F)(3)]
- 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 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 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 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 26, §26.701(H)]
 17. If the permit allows different operating scenarios, the permittee shall, 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 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 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 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 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 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;
 - 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 shall 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

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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 26, §26.703(E)(3)]

- a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. 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;
 - e. and 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 26, §26.704(C)]
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. 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 A.C.A. §8-4-304 and §8-4-311]

APPENDIX A