

ADEQ DRAFT MINOR SOURCE AIR PERMIT

Permit No. : 0926-AR-6

IS ISSUED TO:

EZ Loader Custom Boat Trailers, Inc.
6533 Highway 126 North
Midway, AR 72651
Baxter County
AFIN: 03-00070

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. § 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Stuart Spencer
Associate Director, Office of Air Quality

Date

EZ Loader Custom Boat Trailers, Inc.

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List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: EZ Loader Custom Boat Trailers, Inc.

AFIN: 03-00070

PERMIT NUMBER: 0926-AR-6

FACILITY ADDRESS: 6533 Highway 126 North
Midway, AR 72651

MAILING ADDRESS: 6533 Highway 126 N.
Midway, AR 72651

COUNTY: Baxter County

CONTACT NAME: Linda Tuhacek

CONTACT POSITION: Safety and Compliance Coordinator

TELEPHONE NUMBER: (870) 481-5138

REVIEWING ENGINEER: Andrea Sandage

UTM North South (Y): Zone 15: 4025521.94 m

UTM East West (X): Zone 15: 548565.27 m

Section II: INTRODUCTION

Summary of Permit Activity

EZ Loader Custom Boat Trailers, Inc. owns and operates a boat trailer manufacturing facility located at 6533 Highway 126 North in Midway, Arkansas 72651. With this de minimis application, the facility proposes to increase the VOC content in primer coatings (SN-02 and SN-09).

The total permitted emission increases include 8.8 tpy of VOC.

Process Description

Raw materials in the form of rectangular steel tubing, angle, and flat stock are received at the facility and temporarily stored until requested by the cutting area. In the cutting area the steel stock is cut and bent to form the various pieces of the trailer.

From the cutting area the parts are sent to the jig welding area. In this area the cut and bent parts are fitted into jigs and welded together. The emissions at the facility from Gas Metal Arc Welding (GMAW), formerly known as MIG welding, are less than one ton per year and therefore insignificant. Welding emission factors were taken from EPA's AP-42 *Compilation of Air Pollutant Emission Factors Section 12.19*, "Electric Arc Welding."

Trailer assemblies are then sent to the wash area where they are cleaned using a phosphate wash system, and then dried using infrared heat and compressed air. Galvanized parts are sandblasted prior to the paint or primer operations. Two Kelco dust collectors (SN-07 and SN-08) remove dust from the sandblasting area.

Trailer assemblies are primed in Primer Booth (SN-09), and are dried under infrared heaters, and painted in Paint Booth (SN-10). These booths (SN-09 and SN-10) each employ natural gas fired, 1.95 mm BTU/Hr air make-up systems. The emissions associated with the natural gas combustion are considered insignificant activities. There are two additional stand-alone spray booths (SN-02 and SN-03) which are used for priming and spraying trailers with a poly urea coating. After primer and paint, the trailers are dried using infrared heaters. Once the paint is cured, the trailer assemblies are moved to the Finishing Area. In the Finishing Area the wheels are mounted, the lights and wiring are installed, and any required touch-up painting is performed. The finished trailer leaves the Finishing Area ready for loadout.

Acetone, various solvents and HAP-containing solvents are used throughout the facility as

cleaning agents and thinners. Miscellaneous facility-wide, equipment cleaning operations and thinners are covered under a plantwide emissions bubble.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective March 14, 2016
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective March 14, 2016

Total Allowable Emissions

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	0.6	1.5
PM ₁₀	0.6	1.5
PM _{2.5}	See Note*	
VOC	22.7	58.7
Single HAP	27.29	9.5
Combined HAP	27.29	23.75
Acetone	10.10	20.00

*PM_{2.5} limits are source specific, if required. Not all sources have PM_{2.5} limits.

Section III: PERMIT HISTORY

An air permit (926-A) was initially issued to this facility under the name TI Trailers, Inc. on February 1, 1989.

An Air Permit Modification (926 AR-1) was issued July 25, 1995, to list the eight sources and to quantify and qualify their emissions.

This air permit modification (0926-AR-2) was issued on May 9, 1997 to more accurately reflect the actual emissions of the facility. The VOC emissions have been reduced due to the facility's paint supplier reformulating to lower VOC paint and primer mixtures. This permit also lists the VOC Hazardous Air Pollutants (VHAPs). Emissions were permitted at: 1.5 tpy PM/PM₁₀, 69.1 tpy of VOCs, and 8.8 tpy total VHAP. The VOC predominate hazardous air pollutant (VHAP) is 3.4 tons per year of Ethylene Glycol Monobutyl Ether Acetate, CAS# 112-07-2. Emissions from the welding operation are less than one tpy and are insignificant.

Air Permit #0926-AR-2 was amended on April 7, 2003. The Sandblasting Room control equipment was updated with the removal of two existing dust collectors and replacement with two Kelco Model N-1 dust collectors (SN-07 and 08).

Air Permit #0926-AR-2 was revised on November 29, 2005 to reflect a name change from TI Trailers, Inc. to EZ Loader Custom Boat Trailers, Inc. No change of ownership occurred.

Air Permit #0926-AR-3 was issued on April 5, 2006. The following modifications were made: (1) removal of one existing paint booth (SN-01), (2) installation of a new dual process system, primer booth (SN-09) and paint booth (SN-10), (3) addition of acetone as a regulated emission, (4) transfer of all natural gas-fired burners to the insignificant activities list, and (5) relocation of two existing paint booths (SN-02 and SN-03). Total facility emissions were permitted at: 1.5 tpy of PM/PM₁₀, 73.7 tpy VOC, 9.50 tpy Single HAPs, 23.75 tpy Combined HAPs, and 20.00 tpy Acetone.

Air Permit #0926-AR-4 was issued on December 14, 2006. With this permitting action EZ Loader requested the following modifications to its air permit: (1) to be allowed to emit any HAP in De Minimis (trace) amounts, specifically trace amounts of 1,6 Hexamethylene Disocyanate (HMDI), an ingredient of the paint activator, and (2) to remove Primer Booth #1 and its associated exhaust fans (SN-04, 05, and 06). These modifications are covered by the existing facility-wide emissions "bubble". There are no increases in permitted emissions associated with these modifications.

0926-AR-5 was issued on August 7, 2007. With this permitting action EZ Loader requested the following modifications to its air permit: (1) combine permitted emissions from the

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paint booths (SN-03 & 10), (2) combine permitted emissions from the primer booths (SN-02 & 09), and (3) add the clarifying phrase “ready-to-spray” following the pounds per gallon for emission calculations of materials containing VOCs or HAPs (SC# 6, 7, and 8). In the prior permit the VOC total was incorrectly stated. This math error has been corrected and permitted VOCs are 49.9 tpy, a decrease of 23.8 tpy. There were no increases in permitted emissions associated with these modifications.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.19.501 *et seq.* and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	#1 Paint Spray Booth	Removed from Service		
02 & 09	Two Primer Spray Booths (PM Filter each)	VOC	11.9	32.0
03 & 10	Two Paint Spray Booths (PM Filter each)	VOC	10.8	26.7
04, 05, & 06	#1 Primer Spray Booth (1 booth, 3 vents, PM Filter)	Removed from Service		
07 & 08	Sandblasting Room (2 dust collectors)	PM ₁₀	0.6	1.5
Facility-wide	Equipment Cleaning Operations and Thinner Usage	VOC	*	*

* Annual VOC emissions from these activities are included in the emission limits for SN-02, 03, 09 and 10.

- The permittee shall not exceed the emission rates set forth in the following table.
 [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	#1 Paint Spray Booth	Removed from Service		

SN	Description	Pollutant	lb/hr	tpy
02 & 09	Two Primer Spray Booths (PM Filter each)	Single HAP Combined HAPs	8.55 8.55	* **
03 & 10	Two Paint Spray Booths (PM Filter each)	Single HAP Combined HAPs	10.6 4 10.6 4	* **
04, 05, & 06	#1 Primer Spray Booth (1 booth, 3 vents, PM Filter)	Removed from service		
07 & 08	Sandblasting Room (2 dust collectors, PM Filter)	PM	0.6	1.5
Facility-wide	Equipment Cleaning Operations and Thinner Usage	Acetone Single HAP Combined HAPs	10.1 0 8.1 8.1	20. 00 * **
Facility-wide	Total Annual HAP Emissions	Single HAP Combined HAPs		*9. 50 **2 3.7 5

* Summary Single HAP tpy

**Summary Combined HAPs tpy.

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Limit	Regulatory Citation
02, 03, 09 & 10	10%	§18.501 of Regulation 18
07 & 08	20%	§18.501 of Regulation 18

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation 18, if the emission of the air contaminant constitutes air pollution within the meaning of Ark. Code Ann. § 8-4-303. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Reg.18.901 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-03 and 10 Conditions

6. The permittee shall not use any paint at the facility that contains VOCs or HAPs in excess of 3.8 pounds per gallon ready-to-spray. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-02 and 09 Conditions

7. The permittee shall not use any primer at the facility that contains VOCs in excess of 6.5 pounds per gallon ready-to-spray or HAPs in excess of 3.8 pounds per gallon ready-to-spray. [Reg.19.705 and/or §18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Facility-Wide Conditions

8. The permittee shall not use solvent, as cleaning agent, thinner, and top coat, at the facility that contains VOCs or HAPs in excess of 5.4 pounds per gallon ready-to-spray. [Reg.19.705 and/or §18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
9. The permittee shall maintain monthly records and calculations of the VOC emissions from all paints, primers, cleaning solvents, thinners, and top coats used at this facility, which demonstrate compliance with Specific Conditions #1, #6, #7, and #8. These records shall list chemicals by name and product number. These records shall indicate the amount of each paint and primer used, the respective VOC content of each gallon of material (lbs/gal), and the resulting emissions from the usage of each material (lbs/mo). A consecutive twelve-month rolling total and each individual month's data shall be maintained in a spreadsheet, database, or other well-organized format. These records shall be maintained on-site, and made available to Department personnel upon request. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

10. The permittee shall maintain monthly records and calculations of the HAP emissions from paints, primers, solvents, cleaning agents, thinners, and top coats used at this facility, which demonstrate compliance with Specific Conditions #2, #6, #7, and #8. These records shall list chemicals by name and product number. These records shall indicate the amount of each paint, primer, solvent, cleaning agent, thinner and top coat used, the respective HAP content of each gallon of material (lbs/gal), and the resulting emissions from the usage of each material (lbs/mo). A consecutive twelve-month rolling total and each individual month's data shall be maintained in a spreadsheet, database, or other well-organized format. These records shall be maintained on-site, and made available to Department personnel upon request. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain.
[Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
11. The permittee shall not use more than 7,200 gallons of acetone at the facility during any consecutive 12-month period. A consecutive twelve month rolling total and each individual month's data of the amount of acetone used shall be maintained. The permittee shall not use more than 4.5 gallons per hour of acetone (as a monthly average) facility-wide. The permittee shall not use more than 1.5 gallons per hour of HAP- containing solvent (as a monthly average) facility-wide. The permittee shall maintain records of the amount of acetone and HAP-containing solvent used per month and the hours of operation per month of the facility. These records shall be used to calculate the average hourly individual and summary total rate of acetone and HAP-containing solvent consumption. This value shall be determined by dividing the monthly quantity of acetone and HAP-containing solvent consumed by the total hours of facility operation. These records shall be maintained on-site and made available to Department personnel upon request. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. All equipment cleaning operations and thinner usage in the facility are covered under a plant-wide "emissions bubble."
[Reg.19.705 and/or §18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
12. The permittee shall not use any paints, primers, solvents, cleaning agents, thinners, and top coats at the facility which contain any HAP or air contaminant which exceeds the TLV value as shown in the following table. Paints, primers, and solvents may be used which contain HAPs not specifically listed in this permit as long as the content of the HAP in the paint, primer, or solvent used falls below the content limits as presented in the following TLV Table. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Table 4 – TLV Limit

Maximum Content (lbs/gal)*		Minimum TLV (mg/m ³)
Paint & Primer	Solvents (Cleaning Agent, Thinner, Top Coat	
3.8	5.4	16.2
3.0	4.25	12.8
2.0	2.85	8.6
1.0	1.42	4.3
2.1	0.71	2.1
0.1	0.14	0.4
0.01	0.01	**

* HMDI (822-06-0) and other low TLV substances which are not able to comply with this table may be used if they comply with Specific Condition #14.

** Single HAP concentrations which occur in De Minimis trace amounts (less than 1.0 wt%) are not required to demonstrate compliance with this table. Instead compliance shall be demonstrated through compliance with Specific Condition #14.

13. The permittee shall maintain records of the ACGIH TLV values as listed on current MSDS forms, or in the most recently published ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs) for each HAP and/or air contaminant-containing material used at the facility. The TLV for each HAP and/or air contaminant (in mg/m³) should be noted on these records. These records shall be maintained in a spreadsheet, database, or other well organized format. These records shall be updated as necessary whenever a new paint and/or primer is used on-site, and made available to Department personnel upon request. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
14. Certain HAP containing materials that are unable to meet the requirements of Table 6 may be exempted provided that all of the following conditions are met. Any exemptions that are claimed must be noted on the HAP records required by Specific Condition #13. [Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

- a. Emissions of the exempted pollutants will not exceed 200 lb of any single HAP during any one month.
 - b. This exemption may only be claimed if the source material of the HAP is used as an activator, as touch-up or other small quantity application. This exemption may not be claimed for any HAP emissions resulting from the usage of bulk process materials (such as paints) that are used in large quantities on a regular basis. The Department will reserve the right to determine whether a material qualifies under this condition.
 - c. Total emissions of any single HAP that are claimed as an exemption may not exceed 1 tpy and the combined HAP emissions that are claimed as an exemption may not exceed 2.5 tpy.
15. The permittee will use only pipeline quality natural gas as fuel. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 16. The permittee shall allow no open burning of any material at this facility. There shall not be any disposal of VOC containing scrap and/or waste by evaporation or incineration. All scrap paints, primers, activators, accelerators, and solvents are classified as hazardous waste. [Reg. 18.602 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and Regulation 19 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated September 13, 2006 and May 7, 2007. [Reg.19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
Welding	A-7
#2 Primer Drying Booth Burner (SN-09) (1.95 mm BTU/hr, natural gas)	A-1
#4 Paint Drying Booth Burner (SN-10) (1.95 mm BTU/hr, natural gas)	A-1
Crossdraft Bake Oven Tunnel (SN-11) (0.98 mm BTU/hr, natural gas-fired)	A-1

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 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 (Ark. Code Ann. § 8-4-101 *et seq.*). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after each of the following events: commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Reg.19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Reg.19.410(B) and/or Reg.18.309(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Arkansas Department of Environmental Quality

Office of Air Quality
ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

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

- b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.
- 11. The permittee shall allow representatives of the Department upon the presentation of credentials: [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
- 12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- 13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Reg.19.410(A) and/or Reg.18.309(A) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- 14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the

new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Reg.19.407(B) and/or Reg.18.307(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Reg. 18 and/or Reg. 19 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [Ark. Code Ann. § 8-1-105(c)]
19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
 - a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Reg.18.314(A) and/or Reg.19.416(A), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
 - a. Such a request does not violate a federal requirement;

- b. Such a request is temporary in nature;
- c. Such a request will not result in a condition of air pollution;
- d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
- e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
- f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Reg.18.314(B) and/or Reg.19.416(B), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Reg.18.314(C) and/or Reg.19.416(C), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

22. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [Reg.18.1001, Reg.19.701, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]