DIVISION OF ENVIRONMENTAL QUALITY

DRAFT MINOR SOURCE AIR PERMIT

PERMIT NUMBER: 1571-AR-13

IS ISSUED TO:
Hermann Companies, Inc. d/b/a Anchor Packaging Division of Hermann Companies, Inc.
2211 North 12th Avenue
Paragould, AR 72450
Greene County
AFIN: 28-00101

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 DIVISION OF ENVIRONMENTAL QUALITY'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:

William K. Montgomery
Associate Director, Office of Air Quality
Division of Environmental Quality

Date

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List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	Arkansas DEQ 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

Section I: FACILITY INFORMATION

PERMITTEE: Hermann Companies, Inc. d/b/a Anchor Packaging Division of Hermann Companies, Inc.

AFIN:	28-00101
PERMIT NUMBER:	1571-AR-13
FACILITY ADDRESS:	2211 North 12th Avenue Paragould, AR 72450
MAILING ADDRESS:	2211 North 12th Avenue Paragould, AR 72450
COUNTY:	Greene County
CONTACT NAME:	Bryan Thompson
CONTACT POSITION:	Safety/Environmental Director
TELEPHONE NUMBER:	(870) 597-4646
REVIEWING ENGINEER:	Elliott Marshall
UTM North South (Y):	Zone 15: 3996420.76 m
UTM East West (X):	Zone 15: 728061.38 m

Section II: INTRODUCTION

Summary of Permit Activity

Anchor Packaging Division of Herman Companies Inc. (Anchor Packaging) owns and operates a plastic packaging manufacturing facility at 2211 North 12th Avenue, Paragould, Greene County. The plant manufactures semi-rigid plastic containers used primarily in the food industry for packaging. This application was submitted to add two new Inline Machines as IL-77 (SN-40) and IL-78 (SN-41) to produce packaging from polypropylene. Permitted emissions are increasing by 8.6 tpy PM/PM_{10}, 1.2 tpy VOC, 0.40 tpy Acetone and 0.02 Total HAPs.

Process Description

Extrusion Sheetline (SL)

There are five extrusion Sheetline machines. These machines release emissions that are vented through ceiling and/or wall mounted exhaust fans without controls and ductwork, and these produce large rolls of different widths and thicknesses (e.g., 30 inches wide by 0.04 inches thick) of semi-rigid plastic sheet stock of various compounds {Polypropylene (PP), Polystyrene (PS), Polyvinylchloride (PVC) and Amorphous Polyethylene Terephthalate (APET) used exclusively in Sheetline SL11}. There is one pelletizer machine that reduces plastic scrap to small bead form for reprocessing. Also, associated with this department is a small laminator used to layer multiple sheets before processing through a thermoformer.

Thermoforming (TF)

The sheetline products (rolls) are stored for later use by the thermoforming (TF) process. There are 11 thermoforming lines that produce a multitude of various sized and shaped containers. The containers are stacked and packed into corrugated boxes for shipment. Emissions are vented through five ceiling and/or wall mounted exhaust fans without controls and without ductwork.

Inline (IL) Machines

There are 16 Inline machines. An inline machine is essentially an extrusion sheetline and a thermoformer tied together for a continuous process, i.e., the sheetline stock is converted to containers immediately upon forming. Emissions are vented through 11 ceiling and/or wall mounted exhaust fans without controls and without ductwork.

Pollution Prevention

Anchor's processes are generally characterized as using stable, non-hazardous chemicals. Manufacturing machines are purchased from OEMs or Vendors, and are common in the plastics industries. No production painting, metal coating or chemical treating, or other processes that are typically associated with industries with a high potential to pollute are performed.

Processes that require heating utilize electric heat. Noncontact cooling water or air is used in processes that require cooling. Fossil based fuels (e.g. natural gas) are used only for space heating. No boilers are utilized.

Most of the plastic scraps and/or finished goods that don't meet quality standards are simply reground and then reprocessed.

Emission stacks are simple exhaust fans whose primary purpose is the exhausting of excess process generated heat to improve employee working conditions, flues for the natural gas fired space heaters (for winter months), and dedicated exhaust for the breaker-plate cleaner. No control devices are used for these sources. There is a baghouse on one storage silo.

Thirteen exterior silos are used for material storage. No below ground chemical storage tanks are used.

Regrinds Material Handling and Storage System

The RMH&SS is a system of metallic tubing, surge bins/cyclones, vacuum pumps and canisters, and storage silos, with the necessary electrical components. The purpose of this system is to semi-automatically collect a portion of the regrinds being generated by the thermoforming scrap grinders and store them in exterior silos. Then, as needed, the RMH&SS will pneumatically deliver the regrinds to the demanding sheetline machine for reprocessing.

The three exterior storage silos are loaded with top mounted vacuum receivers and therefore don't require baghouses. Associated vacuum pumps are located in the interior, ported to the interior, and have inline filters.

Emission Stacks

The majority of the designated stacks (SNs) are simple roof or wall mounted exhaust fans or baghouses.

The fans of interest are SN-0l through 03, 11 through 13, 21 through 25, and 30 through 41 which are mounted in the inline process area, and SN-04, 05, 10, 18, and 19 mounted in the sheetline process areas. These twenty-eight fans are used to clear the production areas of gassed chemicals rising from the extruders' die areas, and to induce fresh air and rid the areas of excess heat generated by the production machines for employee comfort.

Additional stacks are baghouses attached to the powder type storage silos: SN06 on the top of bead Silo-0l (this silo used to contain a powdered RPVC compound, thus the baghouse). The purpose of this baghouse is to clean the pressurized air emitted from the silo's interior of airborne compound particles during the silos' filling process (air from the railcar unloader blower). The sheetline drawing systems deliver to vacuum canisters that deliver to and are purged (blown down) to material hoppers.

Insignificant Sources

There are emissions from parts washers (one in the Maintenance area, one in the Setup area, one in the Machine Shop). These emissions are fugitive in that they are not associated with a specific exhaust fan or stack.

The 8 Inline extruders are equipped with 10 regrind surge bin bag filters. These emissions are exhausted to the plant air and are exempt.

There are 3 ink jet printers located in the Inline Department which are used to periodically print day-codes on some products for quality control tracking purposes.

There is an electric breaker plate cleaning oven used to clean material from breaker plates between uses. Emissions are exhausted to the atmosphere and are controlled with a water muffler.

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 October 10, 2019

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	18.1	78.9
PM_{10}	18.1	78.9
$PM_{2.5}$	See Note*	
VOC	9.5	41.1
CO	17.8	78.2

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
NO_x	2.0	8.5
Acetone	0.10	0.40
Vinyl Chloride	0.57	2.40
Total HAPs	0.02	0.02

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

Section III: PERMIT HISTORY

Permit #1571-A was the first permit issued to Anchor Packaging's Paragould facility.

Permit #1571-AR-1 was issued on September 9, 1996, to document the vinyl chloride emissions and to base the emission rates on the permitted throughput.

Permit#1571-AR-2 was issued on February 11, 1998. This permit documented the addition of a new blown film line, a new railcar unloading machine, and additional blown film mixer, and a new ESO tank. The throughput limits in the specific conditions were also corrected.

Permit #1571-AR-3 was issued on December 9, 1999. This permit allowed for the replacement of a sheetline extruder machine, modification of an existing extruder machine, addition of a minor product additive to some sheetline products, and the addition of two exterior silos and a railcar unloader. At a later date, the permittee decided not to install the railcar unloader as allowed under permit #1571-AR-3.

Permit #1571-AR-4 was issued on June 2, 2000. This permit allowed the following modifications:

- Addition of a new extrusion line;
- Modification of an existing extrusion line;
- Addition of a railcar unloader and silo which will process plastic pellets;
- Addition of 2 regrind dryers; and
- Laminator with no associated emissions.

Permit #1571-AR-5 was issued on March 8, 2001. This permit allowed the following modifications:

- A new thermoformer, trim press, and scrap grinder with insignificant emissions;
- Addition of a railcar unloader, silo, and materials handling system which process plastic pellets and are also insignificant activities;
- An additional extruder sheetline;
- An additional parts washers;
- An increase in permitted emissions to accommodate business growth; and
- No new raw materials were used at the facility; however, the permit throughput limits were increased over those in Permit # 1571-AR-4.

Permit #1571-AR-6 was issued on December 3, 2001. This facility's total emission limits were permitted at: 41.05 tons/yr PM/PM10, 24.79 tons/yr VOC, 50.41 tons/yr CO, 5.51 tons/yr NO_X, 0.96 tons/yr Vinyl Chloride, and 2.51 tons/yr HCl. This permit allowed the following modifications:

- Addition of three (3) inline thermoformer/extruders;
- Regrind bag filters were classified as Insignificant Activities;
- All blown film extruders were removed from the facility;
- The railcar unloader was removed from the facility; and

- Three (3) parts washers (formerly SN-20) were classified as Insignificant Activities.

Permit #1571-AR-7 was issued on November 16, 2005. This permit modification allowed Anchor Packaging to add one (1) thermoformer/ extruder inline machine, thus operating a total of five (5) inline machines. Inline material throughput was be increased from 76,042,901 pounds/yr to 77,642,901 pounds per year. Total facility emissions was permitted at: 42.3 tons/yr PM/PM_{10}, 25.0 tons/yr VOCs, 0.96 tons/yr Vinyl Chloride, 50.8 tons/yr CO, 5.6 tons/yr NO_X and 2.6 tons/yr HCl. Anchor Packaging discontinued the use of a baghouse (SN-06) on an exterior silo because PVC is no longer being received in powdered form. Specific Conditions #1 and #2 were grouped with common emission sources, one for the inline process area (SN-01-03, 11-13) and another for the extrusion sheetline/thermoforming process area (SN-04, 05, 10, 18, 19).

Permit #1571-AR-8 was issued on September 18, 2006. This permit modification allowed Anchor Packaging to install one (1) thermoformer/extruder inline machine, thus operating a total of six (6) inline machines. Inline material throughput was increased from 77,642,901 pounds/yr to 97,670,971 pounds per year. Total facility emissions were permitted at: 47.6 tons/yr PM/PM_{10}, 27.8 tons/yr VOCs, 0.96 tons/yr Vinyl Chloride, 55.1 tons/yr CO, 6.3 tons/yr NO_X and 2.6 tons/yr HCl. This will result in a permitted emission increase of 5.6 tons/yr PM/PM_{10}, 2.8 tons/yr VOC, 4.3 tons/yr CO and 0.7 tons/yr NO_X.

Permit #1571-AR-9 was issued on January 26, 2005. This permit was modified to allow Anchor Packaging to install an 8th Extrusion Line (Sheetline - SL11), which exclusively uses amorphous polyethylene terephthalate (APET). Associated with installation was the relocation of an SL10 blender to the area of SL11. Anchor then converted a PVC silo and railcar unloader to handle APET pellets. Emissions from this Sheetline (SL11) are released primarily through roof mounted exhaust fans (SN-18 and SN-19).
Sheetline material throughput increased from 184,679,194 pounds per year to 219,719,194 pounds per year. This increase in Sheetline throughput was a result of a projected use of 35,040,000 pounds per year of APET. The permitted emissions increase for PM/PM_{10} and VOC was less than 0.1 tpy.

Permit #1571-AR-10 was issued on April 21, 2008. With this de minimis modification to the permit, Anchor installed a new Inline production Line (Inline #67) which consisted of an extrusion line and thermoforming line in sequence. The new line processed an additional throughput of 16,573,920 pounds of inline material and 33,288 pounds of product additive, annually. This source was the 7th production line in the Inline Group and the emissions from the new line were vented through five stacks (SN-21 through SN-25). The requested throughput increases resulted in overall annual permitted emissions increases of 3.43 tons of PM/PM_{10}, 1.64 tons of VOC, 3.21 tons of CO, and 0.35 tons of NO_X.

Permit #1571-AR-11 was issued June 13, 2011. With this modification to the permit, Anchor added eight additional inline machines. The new inline machines were designated Inline #69 through 76. This modification updated the permit to include new facilities constructed in November of 2008 and its emissions stacks. The new equipment was installed in the new building over a period of three to five years. They added ten new emission stacks (SN-30

through 39) located in the new building in the form of exhaust fans to allow for the circulation of air and the reduction of process generated heat. Two exhaust fans (SN-40 and SN-41) were installed in the original facility to alleviate high ambient temperatures.

The emissions calculations for this modification were based upon the following expected production mix: six of the new production lines produce part made from Polypropylene (PP) and two will produce part made from APET. Four of the six new production lines manufacturing PP components were of the same configuration as previous (standard) installations and have the same emissions and emissions rates. The two remaining PP lines are larger and each line produces twice the emissions of the standard machines. The two new APET lines produce approximately the same annual volume as each of the PP lines but with the expected APET emissions.

The non-criteria pollutant HCl associated with the manufacture of PVC sheet is no longer recorded due to the elimination of PVC production. The listing of HCl and respective limitations were removed from the permit. Breaker Plate Cleaner and Silo Baghouse (formerly SN-06) were removed from the permit as well. Additionally, Anchor requested that the singular reporting for Inline #67 be included in the plant totals to eliminate the current separate reporting requirements. The total permitted annual emission rate limit changes associated with this modification included: +19.2 tpy PM/PM_{10}, +10.2 tpy VOC, +19.8 tpy CO, +1.9 tpy NO_X, -2.51 tpy HCl, and +1.34 tpy Vinyl Chloride.

Permit #1571-AR-12 was issued March 22, 2018. This permitting action was necessary to install an electric breaker plate cleaning oven to the facility's A-13 Insignificant Activities list.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. 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
01-03, 11-13, 21-25, 30-35, & 39	Inline (IL) Process Area, 14 Machines and 13 Stacks	PM_{10} VOC CO NO_x	10.8 6.0 11.6 1.3	47.4 26.1 51.0 5.6
36-38	2 Inline APET Machines (IL-75 & 76) and 3 Stacks	PM_{10} VOC	0.1 0.2	0.5 0.8
04, 05, & 10	Sheetline and Thermoforming, 7 Sheetlines and 3 Stacks	PM_{10} VOC CO NO_x	4.9 2.8 6.2 0.7	21.3 12.1 27.2 2.9
18 & 19	APET Sheetline (SL-11) and 2 Stacks	PM_{10} VOC	0.3 0.2	1.1 0.9
40	Inline Machine #77	PM_{10} VOC	1.0 0.2	4.3 0.6
41	Inline Machine #78	PM_{10} VOC	1.0 0.2	4.3 0.6

2. 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
01-03, 11-13, 21-25, 30-35, & 39	Inline Process Area, 14 Machines and 13 Stacks	PM Vinyl Chloride	10.8 0.4	47.4 1.6
36-38	2 Inline APET Machines (IL-75 & 76) and 3 Stacks	PM	0.1	0.5
04, 05, & 10	Sheetline and Thermoforming, 7 Sheetlines and 3 stacks	PM Vinyl Chloride	4.9 0.17	21.3 0.74
18 & 19	APET Sheetline (SL-11) and 2 stacks	PM	0.3	1.1
40	Inline Machine #77	PM Acetone Total HAPs	1.0 0.05 0.01	4.3 0.20 0.01

SN	Description	Pollutant	lb/hr	tpy
41	Inline Machine #78	PM Acetone Total HAPs	1.0 0.05 0.01	4.3 0.20 0.01

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
01-05,10-13, 18, 19, 21-25, 30-41	20%	19.501

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]

Plant-wide Conditions

6. The permittee will not process more than 263,410,171 pounds of inline materials, 94,467,840 pounds of inline APET materials, 140,646,194 pounds of sheetline materials, and 35,040,000 pounds of sheetline APET materials at the facility per consecutive 12-month period. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #0. The permittee will maintain a twelve month rolling total and each individual month's data on-site and make 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. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

8. The permittee will not process more than 140,664 pounds of Sheetline Product Additive and 602,960 pounds of Inline Product Additive at the facility per consecutive 12-month period. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

9. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #8. The permittee will maintain a twelve month rolling total and each individual month's data on-site and make 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. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

10. The permittee may process alternative raw materials for product development and/or improvement under the following conditions: [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
    1. Anchor Packaging will not test more than 20 tons of any specific raw materials without notifying the Department within 10 working days.
    2. All alternative raw materials being tested must have the following information on site and ready to be made available to Department personnel upon request: dates of testing period, name and MSDS of material(s), name and telephone number of project manager, and process and machine where the test was performed.
    3. Before any new plastics are put into production they must be tested to verify that they meet all permit limits and that no new HAP's are produced. If new HAP's are emitted or if existing permitted HAP limits increase, the permittee must apply for a permit modification.

11. The permittee will not throughput more than 35,040,000 pounds of APET materials to be used exclusively in Sheetline # 11 (SL11) and 33,147,840 pounds of APET materials to be used exclusively in Inline # 75 & 76 (IL75 & IL76) at the facility per consecutive 12-month period. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

12. The permittee will maintain monthly records which demonstrate compliance with specific Condition #11. The permittee will maintain a twelve month rolling total and each individual month's data on-site and make 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. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Section V: INSIGNIFICANT ACTIVITIES

The Division of Environmental Quality 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 March 13, 2006 and March 1, 2018. [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
Three (3) Parts Washers (formerly SN-20)	A-13
Breaker Plate Cleaning Oven	A-13

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 Division of Environmental Quality 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 Division of Environmental Quality to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Division of Environmental Quality may use the records, at the discretion of the Division of Environmental Quality, 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 Division of Environmental Quality electronically using https://eportal.adeq.state.ar.us or mail them to 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]

   Division 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 Division of Environmental Quality. The permittee must notify the Division of Environmental Quality 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 Division of Environmental Quality 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 Division of Environmental Quality 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 Division of Environmental Quality 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, overnight delivery, or online at https://eportal.adeq.state.ar.us) to the Division of Environmental Quality by the

end of the next business day after the occurrence or the discovery of the occurrence.

c. The permittee must submit to the Division of Environmental Quality, 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 Division of Environmental Quality 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 Division of Environmental Quality issued this permit in reliance upon the statements and presentations made in the permit application. The Division of Environmental Quality 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 Division of Environmental Quality may revoke or modify this permit when, in the judgment of the Division of Environmental Quality, 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 Division of Environmental Quality 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 Division of Environmental Quality denies the request to transfer within thirty (30) days of the receipt of the

disclosure statement. The Division of Environmental Quality 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 Division of Environmental Quality approval. The Division of Environmental Quality 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 Division of Environmental Quality approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Division of Environmental Quality 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 Division of Environmental Quality 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 Division of Environmental Quality approval. The Division of Environmental Quality 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]