DIVISION OF ENVIRONMENTAL QUALITY

DRAFT MINOR SOURCE AIR PERMIT

PERMIT NUMBER: 2455-A

IS ISSUED TO:
MoistureShield, Inc.
801 Jefferson Street
Springdale, AR 72764
Washington County
AFIN: 72-01616

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 RULES PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

David Witherow, P.E.
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
COMS	Continuous Opacity Monitoring System
HAP	Hazardous Air Pollutant
Hp	Horsepower
lb/hr	Pound Per Hour
NESHAP	National Emission Standards (for) Hazardous Air Pollutants
No.	Number
NO_x	Nitrogen Oxide
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate Matter Equal To Or Smaller Than Ten Microns
$PM_{2.5}$	Particulate Matter Equal To Or Smaller Than 2.5 Microns
SO_2	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	MoistureShield, Inc.
AFIN:	72-01616
PERMIT NUMBER:	2455-A
FACILITY ADDRESS:	801 Jefferson Street Springdale, AR 72764
MAILING ADDRESS:	801 Jefferson Street Springdale, AR 72764
COUNTY:	Washington County
CONTACT NAME:	Byron Novillo
CONTACT POSITION:	EH&S Manager
TELEPHONE NUMBER:	(479) 203-5154
REVIEWING ENGINEER:	Sarah Neoh
UTM North South (Y):	Zone 15: 4005906.4 m
UTM East West (X):	Zone 15: 398973.06 m

Section II: INTRODUCTION

Summary of Permit Activity

MoistureShield, Inc. (MoistureShield) manufactures plastic and wood composite building products, e.g., decking, at a facility located at 801 North Jefferson Street, Springdale, Washington County, Arkansas. MoistureShield manufactures products for the building industry including plastic and wood composite decking, decking accessories, door and window components, and industrial flooring. This is the first permit for the existing facility. Permitted emissions are as follows: 31.3 tpy PM, 30.3 tpy PM_{10}, 1.3 tpy SO_2, 80.1 tpy VOC, 29.4 tpy CO, 26.7 tpy NO_x, 0.1 tpy acetone, and 9.44 tpy total HAPs.

Process Description

MoistureShield manufactures products for the building industry including plastic and wood composite decking, decking accessories, door and window components, and industrial flooring. The products are made primarily with recycled wood and recycled polyethylene. The original recycled plastic processing plant was opened in Springdale, Arkansas in 1997 (later designated "Springdale North"). Recycled wood processing, extrusion and milling functions were later added to the Springdale North plant. A new extrusion plant ("Springdale South") with recycled wood processing capacity was constructed in Springdale at 802 N. Huntsville in 2005. These two plants are interconnected, passing raw materials and intermediate products back and forth.

Springdale South

Wood fiber for recycling is delivered by truck and received via a dump pit (SN-S-01). The received fiber is conveyed through a bucket elevator and cyclone to Hammermill 1 (SN-S-02). The fiber then passes through a series of process cyclones to the Fiber Dryer (SN-S-03). Dried fiber is either transported through two cyclones to a Dried Fiber Hopper (SN-S-06), or to a large baghouse. The baghouse bottoms are transported to a filter receiver and Fuel Dust Tank (SN-S-05), which provides fuel for the Fiber Dryer Burner (SN-S-04). The Fiber Dryer Burner combusts wood dust and has a natural gas-fired burner to provide supplemental heat.

From the Dried Fiber Hopper (SN-S-06), wood fiber is screened in the Blue Rotex (SN-S-07). Accepts are transferred through an auxiliary hopper into Fiber Silos #1 and #2 (SN-S-11). Overs are transported to a Holding Bin (SN-S-08), which feeds Hammermills #2 (SN-S-09) and #3 (SN-S-10). Unders are transported to the Fuel Dust Tank. The fiber passes from Hammermills #2 and #3 into two cyclones; the exhaust from these cyclones passes to the Torit Baghouse, and the bottoms to the Green Rotex (SN-S-12). The Torit Baghouse bottoms are transported to the Fuel Dust Tank.

The Green Rotex further screens the fiber. Accepts are transferred to Fiber Silos #1 and #2. Overs are transported through two holding bins (SN-S-13, S-14) into Hammermill #4 (SN-S-15). Fiber from Hammermill #4 is transported to a cyclone, and into Fiber Silos #1 and #2. Exhaust

from the cyclone is transferred to a second large baghouse; the bottoms from this baghouse are transferred to Fiber Silos #1 and #2.

Emissions from the process of sizing, drying, and transferring the wood fibers are controlled with baghouses and high-efficiency cyclones. Once sized, dried, and stored, the dry fiber in Fiber Silos #1 and #2 is transferred as needed to a filter receiver and then to the Line 5 Mixers (SN-S-17) for use as described below, or to a filter receiver to Add Cell 1 (SN-N-03) for use as described in the Springdale North plant description.

Plastics and dry finished fiber are loaded into the Add Cells (SN-S-13) and processed in an extrusion line. Here the materials are mixed in two Line 5 Mixers (SN-S-17) and heated using electric dryers. The heated, mixed material at each line is then fed into mixer extruders, and then into choppers, which extrude and chop the loosely bound mixture into small segments for loading into bags. The Add Cells and Mixers exhaust into a baghouse. The remainder of the extrusion process does not generate particulate matter emissions.

Intermediate and milled product (flooring and decking boards, for example) is received from Springdale North and South and is finished on the Springdale South LPC Line (SN-S-18/18A). Boards are conveyed down the line and air sprayed with primer in a primer booth, then dried in an oven. The boards are then roll coated in a topcoat booth to simulate woodgrain and dried in a second oven. The boards then have their edges printed and finishing touches added with two sets of additional printers, clear coated, then dried in a third oven. The edge and finish printers directly apply coating using rollers and no coating is atomized or sprayed. All emissions from these coating processes are included in the Regenerative Thermal Oxidizer VOC emissions control; non-spray applications such as the roll-on printed paints are included in the 10% of non-captured emissions.

Springdale North

Plastic pellets received for recycling are fed into a hopper, which in turn feeds a reducer which grinds the pellets to appropriate sizes and stores them in one of three plastics silos (SN-N-01). The silos are controlled by a baghouse. Dry finished wood fiber from the South plant, regrind fiber from the Regrind process, and plastics from the North plant silos are metered into the Add Cells (SN-N-03). The Add Cells are small receiving tanks which use a set of four high-efficiency filter receivers to separate fiber/plastic from the conveying air stream. From the Add Cells, plastics and fiber are transferred to the Hold Cells (SN-N-04), a second set of holding tanks; any materials reground at the end of this process (as described below) is returned to the process here.

The Hold Cells feed material to one of four production lines. Line 1 has a set of four mixers, and Lines 2-4 have two mixers each. The wood/plastic material is mixed and heated using non-contact natural gas-fired hot oil heaters (SN-N-05, N-06, N-07, N-08). The heated, mixed material at each line is then fed into hoppers. The material is then transferred into choppers, which chop the loosely bound mixture into segments sufficiently small enough for the extruders to extrude into boards. These extruded raw boards are the intermediate product. The mixers exhaust to a baghouse. The extrusion process does not generate particulate matter emissions. The oil heaters exhaust products of combustion to atmosphere.

The intermediate product is sent to a grooving system (SN-N-09), where the raw boards are grooved and trimmed to size. Any particulate matter (dust) generated by grooving is blown to the Primary Collection Cyclone, which acts as a separator. The bottoms are sent to the Regrind Silos #1, #2, and #3 (SN-N-11), where material is fed as needed to the Hold Cells. The Regrind Silos also receive off-spec product that is sent through the Regrind/Rework (SN-N-10) process. Off-spec product is loaded using front-end loaders into hoppers which feed the material into a regrind process; once ground down to appropriate size, the material is blown into a cyclone. The bottoms from the cyclone are sent to the Regrind Silos #1, #2, and #3. The Regrind Silos are controlled by a single filter receiver.

Miscellaneous Sources

A 0.8 MMBtu/hr ACE Oven is used to burn off and clean the extrusion line dies (IA A-1). The North plant has a cooling tower (IA A-13). The facility also has a 300-gallon diesel tank (IA A 3) stationed at the South plant.

Rules and Regulations

The following table contains the rules and regulations applicable to this permit.

Rules and Regulations
Arkansas Air Pollution Control Code, Rule 18, effective March 14, 2016
Rules of the Arkansas Plan of Implementation for Air Pollution Control, Rule 19, effective May 6, 2022

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	7.7	31.3
PM_{10}	7.5	30.3
$PM_{2.5}$	See Note*	
SO_2	0.6	1.3
VOC	18.5	80.1

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
CO	6.3	26.8
NO_x	5.5	23.6
Total HAPs	2.17	9.44

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

Section III: PERMIT HISTORY

Permit #2455-A is the first permit for this facility. Permitted emissions were as follows: 31.3 tpy PM, 30.3 tpy PM_{10}, 1.3 tpy SO_2, 80.1 tpy VOC, 29.4 tpy CO, 26.7 tpy NO_x, 0.1 tpy acetone, and 9.44 tpy total HAPs.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. [Rule 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
S-01	Wood Fiber Pit (Baghouse)	PM_{10}	0.7	3.0
S-02	Hammermill #1 (Baghouse)			
S-03A	Fiber Dryer (Material Handling Emissions) (Baghouse)			
S-03B	Fiber Dryer (Combustion Emissions)	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.1 0.1	0.1 0.1 0.1 0.4 0.5
S-04	Wood Combustor	PM_{10} SO_2 VOC CO NO_x	0.7 0.3 0.2 5.1 4.2	2.8 1.0 0.7 22.3 18.2
S-05	Fuel Dust Tank (Baghouse)	PM_{10}	0.4	1.5
S-06	Dried Fiber Hopper (Baghouse)	PM_{10}	0.4	1.5
S-07	Blue Rotex (Baghouse)			
S-08	Holding Bin #1 (Baghouse)	PM_{10}	0.2	0.8
S-09	Hammermill #2 (Baghouse)			
S-10	Hammermill #3 (Baghouse)			
S-11	2 Fiber Silos (Baghouse)	PM_{10}	0.2	0.8
S-12	Green Rotex (Baghouse)	PM_{10}	0.2	0.8
S-13	Holding Bin #2 (Baghouse)	PM_{10}	0.2	0.8
S-14	Holding Bin (Baghouse)			

SN	Description	Pollutant	lb/hr	tpy
	#3			
S-15	Hammermill (Baghouse) #4			
S-16	4 Add Cells (Baghouse)	PM_{10}	0.4	1.4
S-17	Line 5 Mixers (Baghouse)			
S-18	LPC Line (Combustion Emissions)	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.8 0.9	0.3 0.1 0.3 3.2 3.8
S-18A	LPC Line (Coating Emissions)	VOC	18.0	78.9
N-01	Plastic Storage Silos (Baghouse)	PM_{10}	0.2	0.8
N-02	Add Cells (Baghouse)	PM_{10}	0.1	0.4
N-03	Hold Cells (Baghouse)	PM_{10}	0.1	0.4
N-04	Line 1 (2.5MMBtu/hr) Oil Heater/Mixer (Baghouse)	PM_{10} SO_2 VOC CO NO_x	0.1 0.1 0.1 0.3 0.3	0.5 0.1 0.1 0.9 1.1
N-05	Line 2 (2.5MMBtu/hr) Oil Heater/Mixer (Baghouse)			
N-06	Line 3 (2.5MMBtu/hr) Oil Heater/Mixer (Baghouse)			
N-07	Line 4 (2.5MMBtu/hr) Oil Heater/Mixer (Baghouse)			
N-08	Extrusion Groovers (Cyclone)	PM_{10}	1.6	6.8
N-09	Regrind/Rework (Cyclone)	PM_{10}	1.6	6.8
N-10	Regrind Silos (Baghouse)	PM_{10}	0.2	0.8

2. The permittee shall not exceed the emission rates set forth in the following table. [Rule 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
S-01	Wood Fiber Pit (Baghouse)	PM	0.7	3.0

SN	Description	Pollutant	lb/hr	tpy
S-02	Hammermill #1 (Baghouse)			
S-03A	Fiber Dryer (Material Handling Emissions) (Baghouse)			
S-03B	Fiber Dryer (Combustion Emissions)	PM Total HAPs	0.1 1.93E-03	0.1 8.44E-03
S-04	Wood Combustor	PM Total HAPs	0.9 0.32	3.8 1.40
S-05	Fuel Dust Tank (Baghouse)	PM	0.4	1.5
S-06	Dried Fiber Hopper (Baghouse)	PM	0.4	1.5
S-07	Blue Rotex (Baghouse)			
S-08	Holding Bin #1 (Baghouse)	PM	0.2	0.8
S-09	Hammermill #2 (Baghouse)			
S-10	Hammermill #3 (Baghouse)			
S-11	2 Fiber Silos (Baghouse)	PM	0.2	0.8
S-12	Green Rotex (Baghouse)	PM	0.2	0.8
S-13	Holding Bin #2 (Baghouse)	PM	0.2	0.8
S-14	Holding Bin (Baghouse) #3			
S-15	Hammermill (Baghouse) #4			
S-16	4 Add Cells (Baghouse)	PM	0.4	1.4
S-17	Line 5 Mixers (Baghouse)			
S-18	LPC Line (Combustion Emissions)	PM Total HAPs	0.1 0.02	0.3 0.07
S-18A	LPC Line (Coating Emissions)	Total HAPs	1.8	7.88
N-01	Plastic Storage Silos (Baghouse)	PM	0.2	0.8
N-02	Add Cells (Baghouse)	PM	0.1	0.4
N-03	Hold Cells (Baghouse)	PM	0.1	0.4

SN	Description	Pollutant	lb/hr	tpy
N-04	Line 1 Oil Heater/Mixer (Baghouse)	PM	0.1	0.5
N-05	Line 2 Oil Heater/Mixer (Baghouse)			
N-06	Line 3 Oil Heater/Mixer (Baghouse)			
N-07	Line 4 Oil Heater/Mixer (Baghouse)			
N-08	Extrusion Groovers (Cyclone)	PM	1.6	6.8
N-09	Regrind/Rework (Cyclone)	PM	1.6	6.8
N-10	Regrind Silos (Baghouse)	PM	0.2	0.8

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
Facility	5%	§18.501 and Ark. Code. Ann.

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 Rule 18, if the emission of the air contaminant constitutes air pollution within the meaning of Ark. Code Ann. § 8-4-303. [Rule 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. [Rule 18.901 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-S-04 Conditions

6. The permittee shall not exceed the throughput limits specified in the following table of this permit

SN	Limit	Raw Material, Product, Fuel, Etc.
S-04	10,853,640 lbs per rolling 12-month period	Wood Combusted

7. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #6. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Division personnel upon request.

SN-S-18A Conditions

8. The permittee shall not exceed the limits specified in the following table of this permit

SN	Limit	Raw Material, Product, Fuel, Etc.
S-18A	166,966 gal per rolling 12 month period	Coatings
	8.00 lb VOC/gal	Maximum VOC Content
	0.80 lb HAP/gal	Maximum HAP Content

9. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #8. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Division personnel upon request. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

10. The permittee shall verify that the minimum combustion zone temperature of the Regenerative Thermal Oxidizer shall not be less than 1400 ˚F while operating. [Rule19.705, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 70.6]

11. The permittee shall install and maintain a device to continuously measure and record the combustion zone temperature of the RTO in order to demonstrate compliance with Specific Condition #10. [Rule19.703, 40 C.F.R. § 52 Subpart E, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

12. The permittee shall test the Regenerative Thermal Oxidizer for SN-S-18 for 98% destruction efficiency using Method 18, 25A, or a method approved by the Division in advance. The permittee must demonstrate that the emissions for SN-S-18 comply with a destruction efficiency of 98% across the RTO. This test shall take place in accordance with General Condition #7. Testing shall be conducted with the source operating at least at 90% of its permitted capacity. Emission testing results shall be extrapolated to correlate with 100% of the permitted capacity to demonstrate compliance. Failure to test within this range shall limit the permittee to operating within 10% above the tested rate. The permittee shall measure the operation rate during the test and if testing is conducted below 90% of the permitted capacity, records shall be maintained at all times to demonstrate that the source does not exceed

operation at 10% above the tested rate. [Rule 19.702 and/or Rule 18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

13. The permittee shall maintain current MSDS information for all materials received by the facility containing VOCs, HAPs, and/or air contaminants. The facility shall update MSDS records as material shipments arrive. The records shall demonstrate that the materials do not contain any HAP with a TLV less than 1.0 mg/m^3. [Rule 18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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 Rule 18 and Rule 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 October 27, 2022. [Rule 19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
0.8 MMBtu/hr Natural Gas-Fired ACE Oven	A-1
300-gal Diesel Storage Tank	A-3
North Cooling Tower	A-13

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Rule 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 Rule 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 Rule 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 rules 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. [Rule 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. [Rule 19.410(B) and/or Rule 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. [Rule 19.705 and/or Rule 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. [Rule 19.705 and/or Rule 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. [Rule 19.702 and/or Rule 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: [Rule 19.702 and/or Rule 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. [Rule 19.303 and/or Rule 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: [Rule 19.601 and/or Rule 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 rules promulgated the Arkansas Water and Air Pollution Control Act. [Rule 19.410(A) and/or Rule 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. [Rule 19.407(B) and/or Rule 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. [Rule 18 and/or Rule 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 Rule 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.

    [Rule 18.314(A) and/or Rule 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.

[Rule 18.314(B) and/or Rule 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.

    [Rule 18.314(C) and/or Rule 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. [Rule 18.1001, Rule 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]