

RESPONSE TO COMMENTS

CMC Steel Fabricators Inc. dba CMC Joist & Deck

AFIN#: 29-00090

Permit #: 1092-AOP-R6

On September 21st 2009 the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, one interested party submitted written comments, data, views, or arguments on the draft permitting decision. The Department's response to these issue is as follows:

Comment #1: (Specific Condition #31)

On page 21, specific condition 31 (d) states to maintain records of "the total monthly amount of paint consumed by SN-06 in tons". Instead of tracking the paint in tons, it seems more practical to track it in gallons. CMC requests a change in tracking paint use by maintaining records of "the total monthly amount of paint consumed by SN-06 in gallons

Response #1: Specific Condition #31 requires the amount of paint used at SN-06 to be tracked and kept on record. Changing the units tracked from tons/month to gallons/month would still fulfill the requirements of the condition. This requested change is accepted.

ADEQ

ARKANSAS
Department of Environmental Quality

December 2, 2009

Marcus Redburn
V.P. & Regional Operations Manager
CMC Steel Fabricators, Inc. dba CMC Joist and Deck
3565 Hwy 32 North
Hope, AR 71801

Dear Mr. Redburn:

The enclosed Permit No. 1092-AOP-R6 is issued pursuant to the Arkansas Operating Permit Program, Regulation # 26.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 1092-AOP-R6 for the construction, operation and maintenance of an air pollution control system for CMC Steel Fabricators, Inc. dba CMC Joist and Deck to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8.603, within thirty (30) days after service of this decision.

All persons submitting written comments during the thirty (30) day, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates
Chief, Air Division

ADEQ OPERATING AIR PERMIT

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

Permit No. : 1092-AOP-R6

IS ISSUED TO:


CMC Steel Fabricators, Inc. dba CMC Joist and Deck
3565 Highway 32 North
Hope, AR 71801
Hempstead County
AFIN: 29-00090

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

May 15, 2008 AND May 14, 2013

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

Signed:


Mike Bates
Chief, Air Division

December 2, 2009

Date

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: CMC Steel Fabricators, Inc. dba CMC Joist and Deck

AFIN: 29-00090

PERMIT NUMBER: 1092-AOP-R6

FACILITY ADDRESS: 3565 Highway 32 North
Hope, AR 71801

MAILING ADDRESS: 3565 Hwy 32 North
Hope, AR 71801

COUNTY: Hempstead County

CONTACT NAME: Marcus Redburn

CONTACT POSITION: V.P. & Regional Operations Manager

TELEPHONE NUMBER: 870-777-8777

REVIEWING ENGINEER: Ambrosia Brown

UTM North South (Y): Zone 15: 3732535.72 m

UTM East West (X): Zone 15: 442063.94 m

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SECTION II: INTRODUCTION

Summary of Permit Activity

CMC Joist and Deck operates a steel joist manufacturing facility located at 3565 Highway 32 North in Hope, Arkansas. This permit is being issued in order to add a flow coater (SN-06) for processing bridging pieces. This modification increases the hourly potential emission rate for VOC by 1.9 lb/hr. These emissions will be included under the existing yearly VOC emission limits for the facility.

Process Description

CMC Joist and Deck manufactures long span steel joists and bridging pieces using hot rolled or cold formed carbon steel products. A joist is an engineered structural member, generally of open web design, that is suitable for the direct support of roof deck in buildings. Emissions result primarily from the surface coating and drying operations and include volatile organic compounds (VOC) and particulate matter (PM/PM₁₀).

Joist Manufacturing

Flat steel, rolled steel, round bars, and steel angle are the raw materials received at the facility. Raw materials can be received either by truck or rail. Flat sections, angles, and smooth rounds are the major raw steel materials. The manufacturing process begins by cutting (SN-04 and SN-05) the various individual joist pieces from the stored material. The top and bottom chords are composed of two angles separated by webbing. The webbing can be either individual angles or continuous bend smooth round bars.

Assembly of the joist occurs as one single operation. The various components are welded (SN-03) together on-line, using E-70 welding wire. After the joist is completely welded, it is checked by quality assurance personnel for manufacturing defects or faulty welds. Once approved by quality control, the joist is moved down the production line where it is grouped with similar joists into bundles. A bundle of joists usually consists of eight to twelve pieces.

The bundles are painted by lowering them into one of eleven dip tanks (SN-01) using a hoist lift crane. After dipping, the joists are placed over a run-off plate so that excess paint can be returned to the dip tank. After ambient air drying, the joists are loaded for shipping to the customer or stored for near-term shipping.

The dip tank paint supply is mixed as necessary using a portable air-powered mixer. In addition, paint supply and dip tanks are periodically circulated.

Bulk high solids paint and solvents are received in tanker trailer loads of approximately 5,000 gallons. This material is stored in above-grade fixed roof steel tanks. Some customers may request a certain type; such paint is generally received in 400-gallon tote containers which are delivered by over-the road trailers. Small quantities of paint may be contained in five gallon

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buckets and in 55-gallon drums. In addition, 100 to 200 gallons of touch up paint in one gallon containers are maintained at the facility. This paint is shipped with the joist orders for field touch-ups of transportation damaged paint.

Once each year, the paint dip tanks are shut down for maintenance. All paint that can be pumped is temporarily stored in drums or totes and placed back into the dip tank for reuse. The sludge and solid paint wastes are placed into approved drums for temporary storage. This waste material is removed for proper disposal or energy recovery.

Bridging Pieces Coating

Steel bridging pieces are fabricated off site. At the facility, the bridging pieces will be placed on a moving conveyor line and then into the flow coater (SN-06). The flow coater consists of an enclosed curtain coater. The maximum operating rate of the line is based on conveyor speed and anticipated to be 0.92 tons per hour. As the parts move from the coater, they proceed from the conveyor to drying. Drying is facilitated by the use of an electric drying oven. After drying, the bridging pieces are stacked, bundled and ready for shipment to the jobsite for erection. The bridging pieces tie together the joists during installation by the customer.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective January 25, 2009
40 CFR 52.21, Prevention of Significant Deterioration

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Emission Summary

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

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
	Total Allowable Emissions	PM	3.4	11.9
		PM ₁₀	3.4	11.9
		VOC	283.3	610.6***
		NO _x	4.4	17.5
	HAPs	Arsenic*	0.01	0.02
		Chromium*	0.01	0.04
		Chromium VI*	0.01	0.03
		Ethyl Benzene*	30.09	9.90
		Manganese*	0.16	0.55
		Nickel*	0.01	0.04
		Xylene*	32.43	9.90
		Total HAPs	--	24.90**
01	Painting Operations	VOC	281.4	610.6
		Ethyl Benzene*	30.09	9.9
		Xylene*	32.43	9.9
03	Welding Operations	PM	2.3	7.8
		PM ₁₀	2.3	7.8
		Chromium*	0.01	0.01
		Chromium VI*	0.01	0.01
		Manganese*	0.14	0.48
		Nickel*	0.01	0.01
04	Hypertherm Plasma Cutting with Dust Filter	PM	0.2	0.1
		PM ₁₀	0.2	0.1
		NO _x	0.4	0.1
		Arsenic*	0.01	0.01
		Chromium*	0.01	0.01
		Chromium VI*	0.01	0.01
		Manganese*	0.01	0.01

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		Nickel*	0.01	0.01
05	Lincoln Plasma Cutting (2 Mobile Units)	PM	0.9	4.0
		PM ₁₀	0.9	4.0
		NO _x	4.0	17.4
		Arsenic*	0.01	0.01
		Chromium*	0.01	0.02
		Chromium VI*	0.01	0.01
		Manganese*	0.02	0.06
		Nickel*	0.01	0.02
06	Flow Coater Operation	VOC	1.9	8.0

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

** The total yearly HAP emissions are a facility wide limit and do not reflect the total potential emissions from all sources.

*** The total yearly VOC emissions are a facility wide limit and do not reflect the total potential emissions from all sources.

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SECTION III: PERMIT HISTORY

The facility was organized and built near Hope, Arkansas, in 1972 as the Tex-Ark Joist Company. In 1990 the Tex-Ark Joist Company ceased operation and closed. Shortly thereafter CMC-Steel Fabricators of Seguin, Texas, purchased the facility and formed the SMI Joist Company.

The Tex-Ark Joist Company operated without the benefit of an air permit. Upon purchase of the facility, SMI applied for its first permit and air permit 1092-A was issued November 15, 1990. This permit allowed SMI to emit 173.33 tons per year of VOCs from the priming and painting operation.

A modification to the air permit, 1092-AR-1, was issued June 3, 1992, to cover an increase in VOC emissions due to an increase in production. VOC emissions were increased to 418.1 tons per year.

Air permit modification 1092-AR-2 was issued April 12, 1996, to list two previously unlisted sources and to increase VOC emissions. The welding operation was added as SN-03 to cover the particulate matter emitted as welding smoke. A fugitive source was added as SN-04 to cover the incidental VOC losses in storage tanks, pipe fittings, and valves. The Joist Painting Dip Tanks (SN-01) VOC emissions were increased to 454.7 tons per year due to an increase in joist production.

Permit 1092-AOP-RO, the initial Title V permit for this facility, was issued on January 6, 1998. This permit removed the paint and solvent storage tanks as sources from the permit and classified them as insignificant sources.

Permit 1092-AOP-R1 was issued on November 14, 2000. This permit modification added production lines and paint dip tanks. The potential emissions from the new dip tanks were above the PSD significant level for VOC. The emissions from the painting operations increased by 142.1 tons per year VOC. Thus, the VOC emissions from SN-O1A and SN-O1B underwent PSD review.

A number of different control options were analyzed in the SMI Joist Permit application as BACT controls for the painting operations at the facility, the majority of which were cost prohibitive or technically unfeasible due to the nature of the joists that are painted. The control technologies listed in the permit application taking the top down approach were powder coating, water borne (electrodeposition), incineration, carbon adsorption, water borne (spray, dip, or flow coat), and higher-solids paint. Powder coating must be applied using electrostatic equipment which is not practical for bird cage parts. The Faraday cage effect makes painting joist crevices and recesses difficult if not impossible. Cost analyses were done for add on controls such as adsorption and incineration. The least costly add on control was carbon adsorption which would cost \$46,214/ton to control due to the large scale upon which the facility operates. The BACT control for this operation was determined to be low VOC / high solids paints. BACT

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determinations from the RACT/BACT/LAER clearinghouse showed low VOC / high solids as being BACT for similar coating operations. Of the five dip coating facilities found in the RACT/BACT/LAER clearinghouse, the predominate control was low VOC/high Solids paint at typically 3.5 to 3.7 pounds per gallon. Studies by Canam Steel Corporation, a joist company in Maryland showed that too low a VOC content causes the paint to have a high viscosity. As a result of the high viscosity, the paint thickness of the steel joists is thicker than the customer's specification. The thicker paint coating accounts for an increase in VOC emissions because higher viscosities result in more paint being applied per joist. The study showed the amount of VOC emissions was lowest with around a 4.0 to 4.1 pound per gallon of VOC. The BACT limit for this facility is a 4.1 pound per gallon VOC content as applied.

Screening for the ozone NAAQS standard was conducted using the Scheffe Method. The results given by the Scheffe Method showed ozone concentrations increased by 0.011 ppm as a result of this facility. When added to the background concentration for Montgomery County of 0.077 ppm, the resulting total ambient concentration 0.088 was well below the NAAQS standard of 0.12 ppm. Since the predicted ozone concentration was well below the secondary NAAQS levels, emissions from this facility were not expected to result in harmful effects to the soils and vegetation in the area. Also, the VOC emissions from the facility were expected to have a negligible impact on the visibility of the Caney Creek Class I area and the area around the Hope facility. The only increase in emissions from associated growth resulted from the increase in workers traveling to and from work. Emissions from the increase in workers traveling to and from work were assumed to be insignificant and thus would have a minor impact (if any) to the Hope area.

Permit 1092-AOP-R2 was issued on March 11, 2003. In addition to the Title V air permit renewal, this permitting action was necessary to limit the hazardous air pollutant (HAP) emissions to 9.5 tpy individual HAP and 23.75 tpy total HAP. An administrative amendment was issued on April 1, 2003 to amend the cover page to include the dates for which the permit was valid.

Permit 1092-AOP-R3 was issued on November 15, 2007. This permitting action was necessary to permit an existing plasma cutter (SN-04); reduce the annual permitted limit of welding wire to 3,000,000 pounds per 12-month period; and change the facility name from CMC Joist to CMC Joist and Deck. The total permitted annual emission rate limit increases associated with this modification included: 0.1 tons per year (tpy) NO_x, 0.01 tpy chromium, and 0.01 tpy manganese. The total permitted annual PM/PM₁₀ emission rate limits decreased by 2.1 tpy.

Permit 1092-AOP-R4 was issued on May 15, 2008. This permitting action was necessary to renew the facility's Title V air permit; increase the VOC emission rate limits at SN-01 to the BACT limit of 4.1 lb VOC/gal; increase the single HAP emission rate limit to 9.9 tpy and total HAP emission rate limit to 24.9 tpy; move the permitted plasma cutter (SN-04) to the insignificant activities list; permit two additional plasma cutters as insignificant activities; add more recordkeeping requirements to ensure that HAP major source thresholds are not exceeded; increase the VOC content of the solvent used at SN-01; permit HAPs for the solvent used at SN01; add VOC content and HAP content limits for the solvent used at SN-01; permit HAPs for

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the Welding Operations (SN-03); and clarify the language in Specific Condition #6b. The total permitted annual emission rate limit increases associated with this modification included: 12.0 tons per year (tpy) VOC, 0.4 tpy ethyl benzene, 0.47 tpy manganese, and 0.4 tpy xylene. The total permitted annual emission rate limit decreases associated with this modification included: 0.1 tpy PM/PM10 and 0.1 tpy NOx.

Permit 1092-AOP-R5 was issued on January 13, 2009. This permitting action was necessary to: correct the number of joist assembly lines; permit the three plasma cutters (SN-04 and SN-05) as sources to be used in an open environment; recognize that the Hypertherm plasma cutter (SN-04) is outfitted with a dust filter; update the permit to include the new reportable HAPs at SN-03, SN-04, and SN-05; and specify the amount of chromium VI permitted at SN-03, SN-04, and SN-05. The total permitted annual emission rate limit increases associated with this modification included: 4.1 tons per year (tpy) PM/PM10, 17.5 tpy NOx, 0.02 tpy arsenic, 0.03 tpy chromium, 0.03 tpy chromium VI, 0.07 tpy manganese, and 0.04 tpy nickel.

SECTION IV: SPECIFIC CONDITIONS

SN-01

Paint and Operations

Source Description

SN-1 consists of 15 dip tanks and the emissions from outdoor touch up painting. The paint for the touch up painting is taken from the dip tanks. The tanks range in length from 22 feet to 120 feet. A crane lowers a bundle of joists into a paint tank and then places it on a run-off plate so that excess paint can be returned to the tank. The joists are air dried for four to five hours. The paint tanks are covered when the painting operation is suspended for more than four hours. The paint tanks are mixed two to three times per day using a portable air-powered mixer. After ambient air drying, the joists are loaded for shipment to a customer or placed in storage.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Specific Condition #3, #4, #5, #6, #8, and #10. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	Paint Operations	VOC	281.4	610.6*

*The total VOC emissions for all sources in the facility can not exceed 610.6 tpy. This may reduce the actual annual emissions allowed from this source.

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Specific Condition #7, #9, #11 and General Provision #7. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Paint Operations	Ethyl Benzene	30.09	9.9
		Xylene	32.43	9.9

3. The permittee shall not use paint with VOC content greater than 4.1 lb/gal. Compliance with this condition will be demonstrated by Specific Condition #6 [§19.901 et seq and 40 CFR Part 52, Subpart E].

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4. The permittee shall keep the covers over the paint dip tanks closed when not in use for more than four hours [§19.901 et seq and 40 CFR Part 52, Subpart E].
5. The permittee shall maintain monthly records of the facility's VOC emissions. These records shall be updated by the 10th day of the month following the month to which the records pertain and submitted in accordance with General Provision #7. These records shall include the following information [§19.907 of Regulation 19 and 40 CFR Part 52, Subpart E].
 - a. The name of each VOC containing paint and solvent used that month and the tank to which it was added.
 - b. The VOC content, in lb/gal, of each paint and solvent used as documented by the manufacturer's MSDS sheets or equivalent.
 - c. The amount of paint of each type added to each tank
 - d. The amount of the solvent added to each tank and to which paint it was added.
 - e. The total monthly emissions of VOC from SN-01
 - f. The consecutive 12 month total tons of VOC emitted by all sources in the facility
6. The permittee shall maintain records which show compliance with the facility's VOC content BACT limit in Specific Condition #3 for each tank. These records shall be updated immediately before the start of any painting shift and after any paint or solvent is added and mixed in the tank. These records shall contain the following information [§19.901 et seq and 40 CFR Part 52, Subpart E].
 - a. Viscosity and temperature of the paint in each tank.
 - b. The VOC content of the paint as determined from VOC/viscosity charts for the paint being used as provided by the coating manufacturer. The VOC content shall not be determined from a VOC/viscosity chart which was created for a temperature greater than 10 degrees Fahrenheit above the temperature recorded for the paint. The VOC content shall always be taken from a chart to which was created for a temperature at or above the temperature recorded for the paint.
7. The permittee shall not purchase paint with Xylene content greater than 0.54 pounds per gallon or Ethyl Benzene content greater than 0.54 lb/gal. The permittee can substitute a less toxic HAP for Xylene or Ethyl Benzene provided that it does not have a concentration greater than 0.54 lb/gal and has a TLV equal to or higher than the TLV for Xylene or Ethyl Benzene. Compliance with this condition will be demonstrated by Specific Condition #12 [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].
8. The permittee shall not purchase solvent with VOC content greater than 6.65 lb/gal. Compliance with this condition will be demonstrated by Specific Condition #12 [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6].

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9. The permittee shall not purchase solvent with Xylene content greater than 0.34 lb/gal or an Ethyl Benzene content greater than 0.07 lb/gal. The permittee can substitute a less toxic HAP for Xylene or Ethyl Benzene provided that it does not have a concentration greater than the permitted content of the HAP for which it is being substituted and has a TLV equal to or higher than the TLV for Xylene or Ethyl Benzene. Compliance with this condition will be demonstrated by Specific Condition #12 [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].
10. The permittee shall not use more than 55 gal of paint for touch up purposes per day. Compliance with the condition will be demonstrated by Specific Condition #11 [§18.1004 of Regulation 18, §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].
11. The permittee shall maintain records of the amount of paint used in touch up painting each day to show compliance with Specific Condition #10. These records shall be updated on every day that touch up painting occurs [§18.1004 of Regulation 18, §19.705 of Regulation 19, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].
12. The permittee shall maintain MSDS or other records which indicate the VOC and/or HAP content of all paints and solvents in use at SN-01. MSDS sheets should be updated annually. These records shall be maintained on-site and shall be made available to Department personnel upon request. [§19.705 of Regulation 19 and 40 CFR Part 52 Subpart E and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-03
 Welding Operations

Source Description

On the assembly or rigging line the precut pieces are assembled and welded together using E-70S type welding wire. Gas metal arc welding (GMAW), formally know as MIG wire welding, is the type of welding used to build the joists. GMAW uses a continuous alloy wire feed in the presence of an electric arc and inert gases to weld the pieces together. This process forms higher quality welds with fewer air pollutants than rod or stick welding.

The pollutant of concern during the welding operation is particulate matter. The welding fume is formed by the vaporization of metal at the arc and recondensing of metallic elements upon cooling in ambient air. The smoke particles produced are submicron in size with 50% to 75% of the particulates having diameters in the range of 0.4 to 0.8 micron. There are eight welding locations on each of the five joist assembly lines.

Specific Conditions

13. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #15 and #16. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
03	Welding Operations	PM ₁₀	2.3	7.8

14. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #15 and #16. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
03	Welding Operations	PM	2.3	7.8
		Chromium	0.01	0.01
		Chromium VI	0.01	0.01
		Manganese	0.14	0.48
		Nickel	0.01	0.01

15. The permittee shall not use more than 3,000,000 lbs of welding wire in any consecutive 12 month period. Compliance with this condition will be demonstrated by Specific

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Condition #16. [Regulation 18 §18.1004, Regulation 19, §19.705, 40 CFR 70.6 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

16. The permittee shall maintain monthly records of the amount of welding wire used at the facility. These records shall include both the monthly usage and the consecutive 12 month total of welding wire usage. These records shall be updated by the 10th day of the month following the month to which the records pertain and submitted in accordance with General Provision #7. [Regulation 18 §18.1004, Regulation 19, §19.705, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SN-04 and SN-05
 Plasma Cutting

Source Description

This source consists of one Hypertherm HD3070 cutter and two Lincoln plasma cutters for cutting mild steel.

Specific Conditions

17. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #23, #24, #25 and #26. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
04	Hypertherm Plasma Cutting with Dust Filter	PM ₁₀	0.2	0.1
		NO _x	0.4	0.1
05	Lincoln Plasma Cutting (2 Mobile Units)	PM ₁₀	0.9	4.0
		NO _x	4.0	17.4

18. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Condition #22, #23, #24, #25 and #26. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
04	Hypertherm Plasma Cutting with Dust Filter	PM	0.2	0.1
		Arsenic	0.01	0.01
		Chromium	0.01	0.01
		Chromium VI	0.01	0.01
		Manganese	0.01	0.01
		Nickel	0.01	0.01
05	Lincoln Plasma Cutting (2 Mobile Units)	PM	0.9	4.0
		Arsenic	0.01	0.01
		Chromium	0.01	0.02
		Chromium VI	0.01	0.01
		Manganese	0.02	0.06
		Nickel	0.01	0.02

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19. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
04	5%	§18.501 and A.C.A
05	5%	§18.501 and A.C.A

20. The permittee shall conduct weekly observations of the opacity from sources SN-04 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request.

21. The permittee shall not exceed the following pollutant content limits for the steel cut at SN-04 and SN-05. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	Pollutant Content Limit (% by weight)
Arsenic	0.012%
Chromium	0.27%
Manganese	1.35%
Nickel	0.29%

22. The permittee shall not cut more than 583,992 inches per consecutive 12 month period at SN-04. [Regulation 18 §18.1004, Regulation 19, §19.705, 40 CFR 70.6 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

23. The permittee shall maintain monthly records that demonstrate compliance with Specific Condition #23. The permittee shall update the records by the 10th day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be kept on site and made available to the Department personnel upon request. [Regulation 18 §18.1004, Regulation 19, §19.705, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

24. The permittee shall not exceed the following limits. [Regulation 18 §18.1004, Regulation 19 §19.705, 40 CFR 70.6 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SN	Hours of Operation Limit (hours per day)
04	8
05	16

25. The permittee shall maintain daily records to demonstrate compliance with Specific Condition #25. These records shall be updated daily, maintained on site, and made available to the Department personnel upon request. [Regulation 18 §18.1004, Regulation 19 §19.705, 40 CFR Part 52 Subpart E and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SN-06

Flow Coating Operations

Source Description

The steel bridging pieces pass through an enclosed curtain coater which uses a water-based coating that contains no known HAPs. The total potential usage of coating is estimated to be 2.0 gallons of paint per ton of steel.

Specific Conditions

26. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition through Specific Condition #29, #30, and #31. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
06	Flow Coating	VOC	1.9	8.0*

*The total VOC emissions for all sources in the facility can not exceed 610.6 tpy. This may reduce the actual annual emissions allowed from this source.

27. The permittee shall not use paint with VOC content greater than 1.0 lb/gal as applied. Compliance with this condition will be demonstrated by Specific Condition #31 [§19.901 et seq and 40 CFR Part 52, Subpart E].
28. The maximum allowable annual production rate of the Flow Coater Operation is 8,000 tons of steel per consecutive 12 month period. The permittee shall demonstrate compliance with this condition by Specific Condition #31.
29. The permittee shall maintain monthly records of the facility's VOC emissions. These records shall be updated by the 10th day of the month following the month to which the records pertain and submitted in accordance with General Provision #7. These records shall include the following information [§19.907 of Regulation 19 and 40 CFR Part 52, Subpart E].
- The name of each VOC containing paint used in the Flow Coating operation.
 - The VOC content, in lb/gal, of each paint and solvent used as documented by the manufacturer's MSDS sheets or equivalent.
 - The total monthly amount of steel processed through SN-06 in tons
 - The total monthly amount of paint consumed by SN-06 in gallons
 - The total monthly emissions of VOC from SN-06
 - The consecutive 12 month total tons of VOC emitted by all sources in the facility

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30. The permittee shall maintain MSDS or other records which indicate the VOC and/or HAP content of all paints and solvents in use at SN-06. MSDS sheets should be updated annually. These records shall be maintained on-site and shall be made available to Department personnel upon request. [§19.705 of Regulation 19 and 40 CFR Part 52 Subpart E and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

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

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide:
 - 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.

[Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated September 2, 2009.

Description	Category
4 - Fixed roof, above ground storage tanks. Two have 5,000 gallon capacity. Two have 5,300 gallon capacity. Both are used to store paints with vapor pressure less than 0.5 psia.	A-3
Sand Blasting Operations A-13	A-13

SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26)]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

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

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location;
 - ii. The process unit or emission source deviating from the permit limit;
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
 - iv. The date and time the deviation started;
 - v. The duration of the deviation;
 - vi. The average emissions during the deviation;
 - vii. The probable cause of such deviations;
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
 - ix. The name of the person submitting the report.

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

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

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

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]

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14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

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- d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

24. 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.

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[Regulation 18, §18.314(A), Regulation 19, §19.416(A), Regulation 26, §26.1013(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

25. 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.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), Regulation 26, §26.1013(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

26. 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.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), Regulation 26, §26.1013(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to
CMC Steel Fabricators, Inc. dba CMC Joist and Deck, 3565 Hwy 32 North, Hope, AR, 71801,
on this 2nd day of DECEMBER, 2009.



Pam Owen, AAIL, Air Division