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Air Enforcement: Arkansas Department of Environmental Quality and Arkadelphia, Arkansas Asphalt Roofing Manufacturing Facility Enter into Consent Administrative Order

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The Arkansas Department of Environmental Quality ("ADEQ") and Siplast, Inc. ("SI") entered into a September 29th Consent Administrative Order ("CAO") addressing alleged violations of an air permit. See LIS No. 17-077.

SI is stated to own and operate an asphalt roofing manufacturing facility in Arkadelphia, Arkansas.

The facility is stated to hold Air Permit 0641-AR-5 ("Permit").

The CAO provides that on March 21st and March 30th ADEQ personnel conducted an inspection of the SI facility. The inspection is stated to have covered the reporting period of January 2015 through February 2017.

The inspection allegedly determined that SI:

. . . failed to maintain the established temperature operating parameters for the Fiber Bed Filter systems ("Systems") as required by Specific Condition 24 of the Permit and Table 4 of 40 C.F.R. Part 63, Subpart AAAAAA – National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing (Subpart AAAAAA).

The Systems are stated to control emissions from the main manufacturing equipment, SN-01A and SN-01B, at the facility.

ADEQ is stated to have reviewed records from the Continuous Parameter Monitoring System for the Systems during the inspection and allegedly found that 1,126 three-hour temperature averages were outside of the established temperature operating parameters (64°F - 120°F) between March 1, 2016, and February 28, 2017. These acts are alleged to violate Specific Condition 30 of the Permit.

ADEQ is stated to have informed SI in a letter dated April 5, 2017, of the compliance issues identified in the inspections. SI submitted a response on May 5, 2017. The response noted that after consultation with the manufacturer of the control device, it had been determined that the system was ineffective at inlet gas temperatures up to 150°F. The Site Specific Monitoring Plan was modified to reflect the new operating parameter.

SI's response also provided that:

. . . the intakes to the control device were found to be blocked or closed. The issue has been corrected and the intakes are now operating and are expected to continue to operate within the new temperature range. The facility has instituted daily operating parameter inspections, set up an automatic flagging system in the computer for out of range readings, and instituted monthly reviews and weekly maintenance checks on all air intakes.

SI neither admits nor denies the factual and legal allegations contained in the CAO.

The CAO requires that within 60 days of its effective date SI must conduct a compliance emissions test to demonstrate that the Fiber Bed Filter systems can effectively control emissions from the main manufacturing equipment within the temperature range of 64°F to 150°F as stated in the revised Site Specific Plan. Further, within 90 days of the effective date of the CAO, SI is required to submit the results of the compliance emissions test to ADEQ.

A civil penalty of \$3,600 is assessed by the CAO.

[A copy of the CAO can be downloaded here.](#)