



**Walter Wright, Jr.**  
wwright@mwlaw.com  
(501) 688.8839

# Air Enforcement: Arkansas Department of Energy & Environment - Division of Environmental Quality and Hot Springs Aircraft Structural Parts Facility Enter into Consent Administrative Order

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The Arkansas Department of Energy & Environment – Division of Environmental Quality (“DEQ”) and Triumph Airborne Structures, LLC, (“Triumph”) entered into an August 14th Consent Administrative Order (“CAO”) addressing alleged violations of an air permit. See LIS No. 23-061.

The CAO provides that Triumph owns and operates a miscellaneous surface coating and repair operation of aircraft structural parts facility (“Facility”) in Hot Springs, Arkansas.

The Facility is stated to operate pursuant to an air permit.

Triumph is stated to have requested consideration under DEQ’s Environmental Self-Disclosure Incentive Policy (“Policy”) in a letter dated October 20, 2022, for the disclosure of non-compliance issues associated with its Facility.

Triumph is stated to have provided the following:

1. During a monthly audit of records, Respondent discovered that the differential gas pressure drop of Beverly Pacific Packed Bed Scrubber #2 (SN-06) was 0.5 inches of H2O.
2. A silencer installed as part of SN-06 had visible signs of corrosion. The corroded silencer impeded the airflow, preventing achievement of the required differential gas pressure drop.
3. Respondent reached out to a third-party supplier to fabricate a new muffler to replace the corroded silencer. At the time of the disclosure, the estimated time to receive the muffler was listed as 8 to 9 weeks.

The CAO provides that a review of the Self-Disclosure letter indicated that Triumph failed to maintain the differential gas pressure drop range at SN-06, violating Specific Condition 18 of the permit.

DEQ in correspondence dated December 19, 2022, informed Triumph that it had met all eight conditions of the Policy. As a result, DEQ indicated that it could mitigate up to 100% of the gravity-based component of any administrative penalty in a CAO regarding the self-disclosed violations.

Triumph indicated in January 19th correspondence that, while it had replaced the corroded silencer with a piece of stack material in December 2022, the differential gas pressure drip was still incorrect.

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

The CAO requires the following:

- Within fifteen (15) calendar days of the effective date of this CAO, Triumph shall submit a corrective action plan and schedule regarding the violation of Specific Condition 18
- Within thirty (30) calendar days of the effective date of this CAO, Triumph shall conduct performance testing at SN-06 while operating at a pressure drop of 0.5 inches of H<sub>2</sub>O.
- Within thirty (30) calendar days after the completion of testing at SN-06, Triumph shall submit the test results.
- Within sixty (60) calendar days of the effective date of this CAO, Respondent shall submit a permit modification application to reflect the results of the performance testing at SN-06.

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