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

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The Arkansas Department of Energy and Environment - Division of Environmental Quality ("ADEQ") and AAR Component Services - Hot Springs, LLC ("AAR") entered into an August 14th Consent Administrative Order ("CAO") addressing alleged violations of an Air Permit. See Case #: CAO-25-0029.

The CAO provides that AAR operates a surface coating and repair of aircraft structural parts facility located in Hot Springs, Arkansas.

The facility is stated to operate pursuant to an Air Minor Source Permit.

ADEQ is stated to have undertaken a compliance evaluation at the facility covering the reporting period of October 1, 2022 through September 30, 2024.

The facility is stated to have provided a written response regarding the actions taken to correct the non-compliance items. Further, the facility stated it would begin recording monthly generator hour usage and annual maintenance for the Emergency Generator. Weekly pH checks were reported to have started to be recorded for the Alkaline Clean Tank, Deoxidizing Tank, and Phosphoric Anodize Tank as of December 2024.

The CAO alleges the following violations:

- Failure to comply with a delegated NESHAP requirement.
- Failure to meet record keeping or reporting conditions that are for enforcement of a criteria pollutant emission limit or Rule 19 opacity limit.
- Failure to meet record keeping or reporting conditions that are for enforcement of a criteria pollutant emission limit or Rule 19 opacity limit.

The facility is required to, within 30 calendar days of the effective date of the CAO, demonstrate compliance with Specific Condition 17 of the Permit. Further, it is required to submit 2025 emergency generator hour records for SN-16. In the same timeframe, it is required to demonstrate compliance with Specific Condition 19 of the Permit and submit 2025 pH records for SN-05, SN-06, and SN-07.

The facility within 30 calendar days of the CAO is required to demonstrate compliance with Specific Condition 32 of the Permit and Subpart ZZZZ, and submit 2025 maintenance records for the oil, filter, air cleaner, hoses, and belts for SN-16.

The CAO assesses a civil penalty of \$22,000 which could have been reduced by one-half if the document was signed and returned to ADEQ within 20 calendar days of its receipt.

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