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Air Enforcement: Arkansas Department of Energy and Environment - Division of Environmental Quality and Dumas, Arkansas Truck Suspension Manufacturing Facility Enter into Consent Administrative Order

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The Arkansas Department of Energy and Environment – Division of Environmental Quality (“DEQ”) and SAF-Holland USA, Inc. (“SAF”) entered into a December 31st Consent Administrative Order (“CAO”) addressing an alleged violation of an air permit. See LIS No. 20-003.

The CAO provides that SAF owns and operates a facility (“Facility”) that manufactures truck suspension systems in Dumas, Arkansas.

The Facility is stated to have a permit.

DEQ personnel were stated to have undertaken a compliance inspection of the Facility on April 30, 2019. The reporting period for the inspection is stated to have covered January 2017 through April 2019.

Specific Condition 7 of one of the Facility’s permits is stated to have required SAF to maintain monthly records to demonstrate compliance with Specific Condition 6. Specific Condition 6 is stated to prohibit SAF from processing more than 2,500,000 pounds of welding wire at SN-01 (Fabrication Welding) and SN-05 (Fabrication Welding-New building) per consecutive 12-month period. The 12-month rolling totals and each individual month’s records are to be maintained on site and made available to DEQ personnel upon request.

The CAO provides that the previously referenced inspection indicated SAF failed to provide records at SN-01 for the months of January 2017 through December 2017 and at SN-05 for the months of November 2017 through December 2017 violating certain permit conditions.

Specific Condition 9 is stated to require SAF to maintain and make available logs of total finishing hours at SN-04A (drying oven). The inspection allegedly indicated that SAF failed to provide daily log records of total finishing hours at this emission point from February 6, 2018 through June 13, 2018, and April 1, 2019 through April 30, 2019, violating Condition 9 of Permit R5 and Permit R6.

Specific Condition 10 is stated to require SAF to maintain and make available daily logs of total finishing hours at SN-04B (Touch-Up Painting). The inspection is stated to have indicated that SAF failed to provide

daily log records of total finishing hours at SN-04B for the days of February 6, 2018 through June 13, 2018 and April 1, 2019 through April 30, 2019, violating Specific Condition 10 of Permit R5 and Permit R6.

SAF is stated to have provided correspondence to DEQ addressing the violations found during the inspection. This correspondence indicated the recordkeeping issues were identified. Further, a new recordkeeping system was being developed and utilized to demonstrate compliance with the revised permit that was issued on May 14, 2019.

The CAO requires that within 30 calendar days of the effective date of the CAO that SAF submit records to demonstrate compliance with Specific Conditions 7, 9, and 10 of Permit R7. Such records are required to be submitted no later than the 15th day of each following month for a period of three months from the effective date of the CAO.

A civil penalty of \$9,120 is assessed which could have been reduced to \$4,560 if the document was signed and returned to DEQ prior to December 14, 2019.

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