

# Air Enforcement: Arkansas Department of Environmental Quality and Hope County, Arkansas Aluminum Foil Rolling Mill Enter into Consent Administrative Order



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

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The Arkansas Department of Environmental Quality (“ADEQ”) and JW Aluminum Company (“JAC”) entered into a September 8th Consent Administrative Order (“CAO”) addressing alleged violations of an air permit. See LIS No. 17-063.

The CAO provides that JAC own and operates an aluminum foil rolling mill (“Mill”) in Pope County, Arkansas.

The Mill is stated to operate pursuant to Air Operating Permit 1659-AOP-R5 (“Permit”).

ADEQ personnel are stated to have conducted a compliance inspection of the mill for the reporting period of June 2015 through February 2017 on March 15, 2017 and March 20, 2017.

Pursuant to the inspection JAC is stated to have submitted records of the daily opacity readings for the:

- Holding Furnace #1 (SN-131)
- Holding Furnace #2 (SN-132)
- Melting Furnace #1 (SN-134)

Specific Condition 19 of the Permit is stated to require JAC to conduct daily observations of the opacity from Sources SN-131 and SN-132. Records must be kept of such observations.

Specific Condition 24 of the Permit is stated to require JAC to conduct daily observations of the opacity from SN-134. Records must be kept of such observations.

The CAO states that ADEQ’s review of the records indicated JAC failed to record daily observations of opacity from sources SN-131, SN-132, and SN-134 during the months of June 2015 through December 2015, totaling 214 days, as well as 152 days during the 2016 calendar year. Such alleged failures are stated to violate Specific Conditions 19 and 24 of the Permit.

JAC is stated to have indicated in March 30, 2017 correspondence it was unable to locate the opacity observation records for 2015. Further, JAC stated in additional correspondence to ADEQ:

. . .SN-131 and SN-132 are both Group 2 furnaces. Accordingly, only clean material with no organics can be charged into those furnaces, thus eliminating the potential for generating opacity. All charge material records for those sources were reviewed for 2016 and confirmed that only clean material was charged.

JAC also stated:

. . .SN-134 is a Group 1 furnace; however, it has an opacity monitor in the Secondary Oxidation Chamber (SOC) that is integral to the furnace control logic to minimize the potential for opacity to be emitted. Due to the design of SN-134, any residual organics are destroyed in the SOC through the assistance of air injection when required to ensure complete combustion.

Finally, JAC stated:

. . .to prevent a reoccurrence of the absence of visible emission records, it has retrained the appropriate personnel as to the permit requirements and management has made it clear that disciplinary action will be taken should records not be appropriately maintained in the future.

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

The CAO assesses a civil penalty of \$5,700.

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