

STATEMENT OF BASIS

For the issuance of Air Permit # 0378-AR-18 AFIN: 04-00111

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Gates Corporation - Siloam Springs  
1801 North Lincoln  
Siloam Springs, Arkansas 72761

3. PERMIT WRITER:

Derrick Brown

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Rubber and Plastics Hoses and Belting Manufacturing  
NAICS Code: 326220

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
12/10/2018	De Minimis	Add boilers SN-18 and SN-19

6. REVIEWER'S NOTES:

Gates Corporation of 1801 North Lincoln Street, Siloam Springs, Benton County, Arkansas owns and operates a rubber belt manufacturing facility. This modification adds two (2) grinders at SN-11 and removes boiler#3 (SN-15). This request decreases emissions by 2.8 tpy of PM/PM<sub>10</sub>, 0.1 tpy of SO<sub>2</sub>, 0.7 tpy of VOC, 10.5 tpy of CO, 12.5 tpy of NO<sub>x</sub>, and 0.23 tpy of HAPs.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility was last inspected on May 25, 2017 and was found to be in compliance. There are no pending enforcement actions.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N  
If yes, were GHG emission increases significant? N/A

b) Is the facility categorized as a major source for PSD? N

- *Single pollutant  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
15, 18, 19	N/A	NSPS 40 CFR Part 60 Subpart Dc
16, 17	HAPs	NESHAP 40 CFR Part 63 Subpart ZZZZ

SN-18 and 19 were approved for installation and operation at Permit# 0378-AR-17. At that time, they were evaluated under NESHAP JJJJJ. They were found not to be subject to that subpart because they were approved to burn natural gas only, and thus meet the subpart's definition of gas-fired boilers (see 40 C.F.R. §63.11237), a category not subject to the subpart (see 40 C.F.R. §63.11195(e)).

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

This section is not applicable.

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01, 02	AP-42 1.4 (Natural Gas) HAPs Calculated in Application	NO <sub>x</sub> = 100 lb/MMscf CO= 84 lb/MMscf PM10= 7.6 lb/MMscf SO <sub>2</sub> = 0.6 lb/MMscf VOC= 5.5 lb/MMscf	None	NA	40.8 MMBtu/hr
01, 02	AP-42 1.3 (#2 Fuel Oil) HAPs Calculated in Application	NO <sub>x</sub> = 20 lb/kgal CO= 5 lb/kgal PM/PM <sub>10</sub> = 3.3 lb/kgal SO <sub>2</sub> = 71 lb/kgal VOC= 0.252 lb/kgal	None	NA	40.8 MMBtu/hr
08	Material balance	-	-	-	-
09	AP-42 Table 4.12-9 HAPs Calculated in Application`	Listed in excel spreadsheet on EPA website. Worst Case factors were used.	None	NA	
10	AP-42 Table 4.12-10	VOC – 2.94E-03 HAPS – Listed in excel spreadsheet on EPA website.	None	NA	Units are lbs/lb rubber processed
11	AP-42 Table 4.12-12	EF's listed in excel spreadsheet on EPA website.	Cyclones + ESP	99%	
16	AP-42 3.2-3 HAPs Calculated in Application	PM <sub>10</sub> = 1.94E-2 lb/MMbtu SO <sub>2</sub> = 5.88E-4 lb/MMbtu VOC= 0.36 lb/MMbtu CO= 3.51 lb/MMbtu NO <sub>x</sub> = 100 lb/MMbtu	None	N/A	112 bhp 4S-RB SI Emergency Generator (Installed 2002)

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
17	AP-42 3.3-1 3.3-2 HAPs Calculated in Application	PM <sub>10</sub> = 2.2E-3 lb/hp-hr SO <sub>2</sub> = 2.05E-3 lb/hp-hr VOC= 2.514E-3 lb/hp-hr CO= 6.68E-3 lb/hp-hr NO <sub>x</sub> = 0.031 lb/hp-hr	None	N/A	185 bhp CI Emergency Fire Pump Diesel Engine (Installed 1978)
18, 19	Cleaver Brooks vendor data; AP-42, Table 1.4-3	lb/MMBtu: PM/PM <sub>10</sub> = 0.00735 SO <sub>2</sub> = 0.00058 VOC= 0.003559 CO= 0.0075 NO <sub>x</sub> = 0.035  lb/10 <sup>6</sup> scf: 1.8 single HAP 1.881699 total HAP	None	N/A	37.237 MMBtu/hr. 0.001 MMBtu/scf. 8,760 hrs. Emergency Fire Pump Diesel Engine (Installed 2018)

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

15. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
None				

16. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01, 02	Fuel Oil Usage	869,760 gallons per 12 months	Monthly	N
01, 02	Fuel Oil Sulfur Content	0.5 % sulfur	Each Shipment	N
08	VOC Usage	24 tpy	Monthly	N
08	Toluene Usage	8.5 tpy	Monthly	N
09	Rubber Processed	29,000 lb/hr	Monthly	N
11	Rubber Processed	30,000 lb/hr	Monthly	N
Facility	Rubber Throughput	10,000,000 lb/yr	Monthly	N
Facility	VOCs	42.0 tons	Monthly	N
	HAPs	9.50 tons Single 21.98 tons total	Monthly	
16, 17	Total Hours	500 hrs each	Monthly	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 18, 19 (Natural Gas)	5%	§18.501	Fuel used
01, 02 (#2 Fuel Oil)	20%	§19.503	Inspector Observation
11	10%	§18.501	Inspector Observation
16, 17	20%	§19.503	Inspector Observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
SC-20	SN-15 removed.

19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Oil Demister	A-5			<0.1				
Grinding Wheel Cleaning	A-13			<0.1				
Cooling Towers	A-13			<0.1				

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Misc. Solvent Usage (Mobile Printers)	A-13			4.5			Acetone= 4.5	
Dust Collectors Venting Indoors	A-13	<0.01						
Milling, Extruding, and Calendering	A-13			<0.1				
<b>TOTAL</b>	A-13	<0.01		<4.6			Acetone= 4.5	

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0378-AR-17

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

