

ADEQ

ARKANSAS
Department of Environmental Quality

OCT 01 2007

Chad Thornton, EH&S Coordinator
AmerCable, Inc.
350 Bailey Road
El Dorado, AR 71730

Dear Mr. Thornton:

The enclosed Permit No. 0511-AR-8 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 5/21/2007.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0511-AR-8 for the construction, operation and maintenance of an air pollution control system for AmerCable, Inc. to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under §2.1.14 of Regulation No. 8, Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, within thirty (30) days after service of this decision.

All persons submitting written comments during this thirty (30) day period, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by §2.1.14 of Regulation No. 8.

Sincerely,



Mike Bates
Chief, Air Division

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RESPONSE TO COMMENTS

AMERCABLE, INC.
PERMIT # 511-AR-8
AFIN: 70-00103

On August 26, 2007 and August 29, 2007, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, written comments on the draft permitting decision were submitted by the facility and the Department. The Department's response to these issues follows.

Note: The following page numbers and condition numbers refer to the draft permit. These references may have changed in the final permit based on changes made during the comment period.

Comment #1:

AmerCable would like to ask ADEQ to remove Specific Conditions 20, 21 and 22. These three specific conditions represent recordkeeping requirements that are impossible to prove compliance with.

Based on modeling work performed by ECCI, AmerCable would like to propose that the following alternative recordkeeping requirements are added, in lieu of Specific Conditions 20, 21 and 22:

- a. Limit the facility-wide usage of acetophenone producing thermoset compounds to 99,000 lbs/day.
- b. The permittee shall maintain a log which demonstrates compliance with the daily acetophenone producing thermoset compounds. This log shall be updated daily basis, maintained on site and made available to department personnel upon request.

These proposed recordkeeping requirements should serve to satisfy the intent of the permit.

Response to Comment #1:

A comment from the facility that was received on September 6, 2007 was retracted on September 12, 2007 and replaced with the above comment.

Specific Conditions #20, 21, and 22 were based on the information contained in the permit application. Due to the facility's inability to comply with the conditions, they were replaced with a pound per day limit and associated recordkeeping. The pound per day limit was evaluated against the PAIL. This limit will result in the facility's ability to use acetophenone-producing compounds on all lines at SN-07; therefore, the hourly VOC and acetophenone limits are increasing by 133.1 lb/hr. Specific Conditions #20, 21, and 22 were replaced with the following:

20. The permittee shall limit the usage of acetophenone-producing thermoset compounds to a total of 99,000 pounds per day. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
21. The permittee shall maintain daily records which demonstrate compliance with Specific Condition #20. These records shall be updated by the next day following the day to which the records pertain, maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Comment #2:

Specific Condition #23 should have a regulation cited.

Response to Comment #2:

The typographical error has been corrected.

ADEQ MINOR SOURCE AIR PERMIT

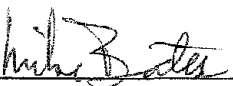
Permit No. : 511-AR-8

IS ISSUED TO:

AmerCable, Inc.
350 Bailey Road
El Dorado, AR 71730
Union County
AFIN: 70-00103

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



Mike Bates
Chief, Air Division

OCT 01 2007

Date

AmerCable, Inc.
Permit #: 511-AR-8
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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: AmerCable, Inc.

AFIN: 70-00103

PERMIT NUMBER: 511-AR-8

FACILITY ADDRESS: 350 Bailey Road
El Dorado, AR 71730

MAILING ADDRESS: 350 Bailey Road
El Dorado, AR 71730

COUNTY: Union

CONTACT POSITION: Chad Thornton, EH&S Coordinator

TELEPHONE NUMBER: (870) 309-3323

REVIEWING ENGINEER: Ann Sudmeyer

UTM North South (Y): Zone 15: 3673.5

UTM East West (X): Zone 15: 535.4

Section II: INTRODUCTION

Summary of Permit Activity

AmerCable, Inc. is a manufacturer of industrial cable. This facility is located in El Dorado, Union County, Arkansas. This permitting action is necessary to:

1. Update the facility contact;
2. Permit the use of acetophenone producing thermosets at SN-12;
3. Limit the annual emissions of acetophenone at SN-07, SN-12, and SN-14 combined to 9.9 tpy;
4. Permit a 4.2 MMBTU/hr natural gas fired boiler (SN-13);
5. Permit a new slant CV line with one extruder at SN-07 (increases hourly throughput by 600 lb/hr);
6. Permit a new catenary line with three extruders at SN-07;
7. Permit the use of acetophenone-producing thermosets at all lines at SN-07;
8. Transfer the 4.5 inch resin line from SN-05 to a new source (SN-14) and allow thermosets and acetophenone-producing thermosets to be used on this line;
9. Increase the VOC, xylene, and ethylbenzene content limits for the Chemlok (SN-06);
10. Replace the 1.75 MMBTU/hr oven in the insignificant activities list with a 1 MMBTU/hr oven;
11. Increase the annual throughput limits for the thermoset compounds (SN-07) and inks and extenders (SN-08);
12. Increase the annual throughput for thermoplastic compounds at SN-05 to maximum capacity; and
13. Correct the UTM coordinates.

The total permitted annual emission rate increases due to this modification include: 0.2 tons per year (tpy) PM/PM₁₀, 0.1 tpy SO₂, 5.4 tpy VOC, 1.6 tpy CO, 1.9 tpy NO_x, 0.2 tpy acetophenone, 0.01 tpy xylene, and 0.5 tpy acetone.

Process Description

Emissions from the AmerCable plant result from several processes involved in the development and production of commercial cable. These emissions include the combustion of natural gas, application of coatings, furnaces, and solvent cleaning.

Raw materials are brought in for storage in the warehouse. This can include spools, pellets for compounding, drums of solvent, and other miscellaneous items.

Heat is supplied to various processing operations through the use of six (6) boilers located at the facility (SN-01, SN-02, SN-03, SN-04, SN-11, and SN-13). Each of these boilers is natural gas fired.

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RESIN LINES

The two (2) Resin Lines (SN-05 and SN-14) at AmerCable are used to produce cables up to 2.5" and 4.5", respectively. Strand enters an electrically heated extruder where compound is introduced and extruded to produce a coated strand. The coated strand is cooled in a water bath before being wound onto a reel. The Resin Lines are similar to the Continuous Vulcanization (CV) lines, except there is no steam tube.

FLAT ASSEMBLY

The Flat Assembly Line (SN-06) mechanically combines conductors which are held in place with string and tape to form a flat cable, which is then dipped into a vat of Chemlok adhesive for bonding. Toluene is added to the Chemlok as an extender. The cable is then heat dried and wound on a reel.

CONTINUOUS VULCANIZATION LINES

There are seven (7) vulcanization lines and four (4) tuber lines (SN-07) located at AmerCable. There are sixteen (16) extruders associated with the CV lines and eight (8) extruders associated with the tuber lines. These lines extrude thermoset/rubber compounds. Vegetable oil is used in small quantities on the "A-Line" as a lubricant. Strand enters the electrically heated extruder where compound is introduced and extruded to produce a coated strand. The coated strand travels through a steam traced tube, then is cooled in a water bath before being wound onto a reel. Acetophenone (a known HAP) is produced during the extrusion process.

MISCELLANEOUS SPECIALTY OPERATIONS

Miscellaneous specialty operations (SN-08) at AmerCable include the Trace and Spool processing area, the Cable Reprint Line, Solvent Cleaning, and Stencil operations.

The Trace and Spool operation consists of running cable through a process that prints a stencil on the cable for marking and/or other purposes. The inks and solvents used in the application can contain VOC and HAP constituents. Stenciling is also applied to finished cable on four (4) CV lines.

The Cable Reprint Line involved a rub down of the cable with a solvent to remove the existing ink or stencil print. The stencil is then reapplied prior to the cable being rewound.

Solvent cleaning is used throughout the facility. The most common solvents are methylene chloride and a cyclohexanone/methyl isobutyl ketone mixture. Solvent is used in closed containers referred to as "soak cans" in the facility. There is also a small parts washer located in the maintenance area.

The Telecom Cable Operation involves pumping a heated saturant material over a cable jacketed with a fiber braid, using a small amount of acetone as an extender. The saturant is then coated with a lacquer which contains 25% acetone and 20% methanol (small amounts of additional acetone are added as an extender.) The lacquered cable then passes through a short tube where it is subjected to heated air and then wound onto a reel.

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LEAD JACKETING OPERATIONS

To produce lead cured cable, a lead jacket is extruded over the uncured cable coating. The purpose of the lead jacket is to act as a mold (maintaining cable diameter) and to equalize heating and cooling during the curing (vulcanizing) process. After curing, the lead jacket is normally mechanically removed and the lead reused. Only a small percent of cable is sold with the lead jacket installed.

Calcium Stearate is applied to the cable as a lead release agent, as the cable is pulled through a water cooling trough. The cable is then pulled through extruders. The extruders coat the cable with molten lead from a 10-ton kettle. A 20-ton kettle feeds the 10-ton kettle. The kettles are filled with either virgin lead which is added by hand or with recycled lead which is added by conveyor from one of the hoppers.

The molten lead flows from the 10-ton kettle through pipes to the extruder, as the cable is pulled through the extruder by the take-up reel machine. When the reel has the desired amount of cable, the cable is cut and the reel is ready for curing.

The loaded reels are moved into the autoclave (vulcanizer) by hand truck. The autoclave is sealed and flooded with carbon dioxide to reduce oxidation of the lead during curing. The autoclave is then heated with steam to provide heat which cures the cable. The temperature and duration cycle varies according to the coating being cured. After this cycle is completed, the cable reel is removed from the autoclave and allowed to cool.

The cooled reel of cable is moved to the stripper payoff reeling machine. The cable is then pulled through the stripper where the lead jacket is mechanically peeled off and cut into chips. These chips are placed in a return hopper to be reused. The finished cable moves to quality assurance prior to being shipped.

All of the lead dust produced from the lead jacketing operations is handled by a baghouse (SN-09)

TAPE CURING OPERATIONS

As an alternative to the lead cured cable, AmerCable may use nylon tape for the cable curing. This nylon curing tape is substituted for the lead. The tape and release agent usage are accounted for in SN-10.

POLYCURE JACKETING OPERATIONS

This process is almost identical to the lead jacketing operation (SN-09) except that instead of a lead jacket, thermosets and thermoplastics are used to form a jacket for curing. This source (SN-12) consists of one extruder for thermoset and one extruder for thermoplastic compounds. The 4.5" resin line (SN-14) can also support this operation.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 15, 2007

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The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Total Allowable Emissions

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	1.0	1.8
PM ₁₀	1.0	1.8
SO ₂	0.6	0.6
VOC	212.7	53.5
CO	2.8	11.2
NO _x	3.4	13.4
Lead ^{HAP}	0.3	0.3
Acetophenone ^{HAP}	156.3	9.90
Di (2-ethylhexyl) phthalate ^{HAP}	0.94	1.48
Ethyl Benzene ^{HAP}	0.24	0.86
Ethylene Glycol ^{HAP}	2.63	0.21
Formaldehyde ^{HAP}	0.05	0.01
Methanol ^{HAP}	3.0	6.00
Methylene Chloride ^{HAP}	5.5	9.5
Methyl Isobutyl Ketone ^{HAP}	5.9	9.5
Toluene ^{HAP}	9.4	9.5
Xylene ^{HAP}	0.86	3.78
Total HAP	---	23.75
Acetone	15.5	20.2

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Section III: PERMIT HISTORY

511-A was issued to United States Steel Corporation for the installation of two fuel oil fired boilers. The maximum emissions were 0.7 pounds of particulate per hour and 2.3 pounds of SO₂ per hour.

511-A (Modification) was issued to United States Steel Corporation to allow firing of residual oil up to 6% sulfur content in its boiler, in the event of unavailability of low sulfur oil or natural gas. The maximum predicted SO₂ emissions were 30.6 pounds per hour, or 99.4 tons per year.

511-AR-2 was approved on May 25, 1984. AmerCable, a Division of Associated Materials, purchased the United States Steel Corporation cable plant. This modification requested that the existing permit (511-A mod.) be issued to AmerCable. The allowable particulate emission rate was 0.7 pounds per hour per boiler, and the allowable SO₂ emission rate was 2.3 pounds per hour per boiler.

511-AR-3 was issued on July 6, 1990. This modification added a 4.2 MMBTU/hr natural gas fired steam generator (SN-03) and a flame testing booth (SN-04) to the facility's air permit. Total allowable emissions were 1.72 pounds of NO_x per hour and 7.54 tons of NO_x per year.

The facility's permit #511-AR-3 was voided due to emissions less than 10 tpy. An authorization to operate was given on January 3, 1994. This authorization allowed the facility to operate in the manner described in the application. The authorization also set operating conditions as follows: (1) set maximum firing rates for the boilers (SN-01, SN-02, and SN-03) and authorized natural gas usage only; (2) authorized the flame test chamber (SN-04) to use only liquefied petroleum gas; (3) install, operate, and maintain the fabric filter (SN-05) per manufacturer's specifications; (4) submit an annual VOC usage report; (5) submit a complete permit application for review and possible permitting activities prior to the installation, modification, or operation of additional processes, equipment, or emission sources; and (6) set visible emission limits for SN-01 through SN-07.

511-AR-4 was issued on November 26, 2003. This permitting action was necessary to formally permit operations at the facility as a synthetic minor source. This permit modification also incorporated a de minimis change to replace the existing two 5-ton lead kettles with a 10-ton kettle and to add one 20-ton lead kettle to SN-09. The total permitted emission rates were 1.4 tons per year (tpy) PM/PM₁₀, 0.4 tpy SO₂, 37.6 tpy VOC, 8.0 tpy CO, 9.6 tpy NO_x, 17.63 tpy acetone, 9.5 tpy or less for each individual hazardous air pollutant (HAP), and 23.75 tpy of any combination of HAPs.

511-AR-5 was issued on October 8, 2004. This de minimis modification was necessary to correct the hourly throughput of inks and extenders; increase the annual ink and extender usage limit to 1,000 gallons per year; increase the VOC content limit of the inks and extenders from 6.9 lb/gal to 9.84 lb/gal; permit the inks and extenders for a maximum methyl isobutyl ketone content of 3.75 lb/gal; permit inks and extenders for a maximum toluene content of 4.97 lb/gal; and increase the acetone content limit of the inks and extenders from 0.6 lb/gal to 4.02 lb/gal. This resulted in permitted emission rate increases of 4.7 tpy VOC, 3.25 tpy methyl ethyl ketone, 1.28 tpy methyl isobutyl ketone, and 2.07 tpy acetone. In addition, the permit was corrected to include the toluene emission limits for SN-08. The Lacquer (Telecom Cable) used at SN-08 was

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permitted for a toluene content of 5% by weight, but the emission rate limits in the previous permit did not reflect this.

511-AR-6 was issued on May 4, 2005. This de minimis modification was necessary to permit the cable curing tape operations (SN-10). This change resulted in permitted emission rate increases of 2.0 tons per year of VOC, 0.21 tpy ethylene glycol, and 0.01 tpy formaldehyde.

511-AR-7 was issued on July 12, 2006. This permitting action was necessary to install a new 4.2 MMBtu/hr natural gas fired boiler (SN-11); permit new Polycure Jacketing Operations (SN-12); add one CV line with one extruder at SN-07; increase the annual throughput limit from 12,000,000 pounds to 21,400,000 pounds of total thermoset compounds (SN-07); revise the acetophenone and VOC emission rate limits for SN-07 based on testing of the cable coating; remove the annual throughput limit of acetophenone-producing thermoset compounds at SN-07 and replace it with a permit limit of 9.7 tpy acetophenone emissions; and remove methyl ethyl ketone from the permit. The total permitted emission rate increases due to this permitting action included: 0.2 tons per year (tpy) PM/PM₁₀, 0.1 tpy SO₂, 3.8 tpy VOC, 1.6 tpy CO, 1.9 tpy NO_x, and 2.2 tpy acetophenone.

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Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 19, §19.501 et seq., effective July 15, 2007 and A.C.A. §8-4-203 as
 referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
SN-01	Cleaver-Brooks Boiler (6.5 MMBTU/hr)	PM ₁₀	0.1	0.3
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.6	2.4
		NO _x	0.7	2.9
SN-02	Cleaver-Brooks Boiler (6.5 MMBTU/hr)	PM ₁₀	0.1	0.3
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.6	2.4
		NO _x	0.7	2.9
SN-03	Kewanee Boiler (4.2 MMBTU/hr)	PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.4	1.6
		NO _x	0.5	1.9
SN-04	Superior Boiler (4.2 MMBTU/hr)	PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.4	1.6
		NO _x	0.5	1.9
SN-05	Resin Line	PM ₁₀	0.1	0.1
		VOC	0.2	0.2
SN-06	Flat Assembly	VOC	4.3	34.2 ^a
SN-08	Miscellaneous Specialty Operations	VOC	23.7	
SN-07	Continuous Vulcanization Lines (24 extruders)	VOC	145.8	14.5 ^b
SN-09	Lead Jacketing Operations	PM ₁₀	0.3	0.3

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SN	Description	Pollutant	lb/hr	tpy
		VOC	0.8	1.4
		Lead	0.3	0.3 ^c
SN-10	Tape Curing Operations	VOC	23.5	2.0
SN-11	Natural Gas Fired Boiler (4.2 MMBtu/hr)	PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.4	1.6
		NO _x	0.5	1.9
SN-12	Polycure Jacketing Operations (2 extruders)	VOC	8.4	14.5 ^b
SN-13	Natural Gas Fired Boiler (4.2 MMBtu/hr)	PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.4	1.6
		NO _x	0.5	1.9
SN-14	4.5-inch Line	VOC	5.4	14.5 ^b

- a. Denotes combined total annual VOC emissions for SN-06 and SN-08.
- b. Denotes combined total annual VOC emissions for SN-07, SN-12, and SN-14 of 14.5 tpy VOC.
- c. Denotes a plantwide limit of 23.75 tons of any combination of HAPs per year.

2. The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as
 referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
SN-01	Cleaver-Brooks Boiler (6.5 MMBTU/hr)	PM	0.1	0.3
SN-02	Cleaver-Brooks Boiler (6.5 MMBTU/hr)	PM	0.1	0.3
SN-03	Kewanee Boiler (4.2 MMBTU/hr)	PM	0.1	0.2
SN-04	Superior Boiler (4.2 MMBTU/hr)	PM	0.1	0.2
SN-05	Resin Line	PM	0.1	0.1
SN-06	Flat Assembly	Ethyl Benzene	0.2	0.68 ^a

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SN	Description	Pollutant	lb/hr	tpy
		Toluene	3.6	9.50 ^c
		Xylene	0.54	2.37 ^a
SN-07	Continuous Vulcanization Lines (24 extruders)	Acetophenone	143.10	9.90 ^b
		Di (2-ethylhexyl) phthalate	0.94	1.48 ^a
SN-08	Miscellaneous Specialty Operations	Acetone	15.5	20.2
		Ethyl Benzene	0.04	0.18 ^a
		Methanol	3.0	6.00 ^a
		Methylene Chloride	5.5	9.50 ^a
		Methyl Isobutyl Ketone	5.9	9.50 ^a
		Toluene	5.8	c
		Xylene	0.32	1.41 ^a
SN-09	Lead Jacketing Operations	PM	0.3	0.3
SN-10	Tape Curing Operations	Ethylene Glycol	2.63	0.21 ^a
		Formaldehyde	0.05	0.01 ^a
SN-11	Natural Gas Fired Boiler (4.2 MMBtu/hr)	PM	0.1	0.2
SN-12	Polycure Jacketing Operations (2 extruders)	Acetophenone	8.10	9.90 ^b
SN-13	Natural Gas Fired Boiler (4.2 MMBtu/hr)	PM	0.1	0.2
SN-14	4.5-inch Line	Acetophenone	5.10	9.90 ^b

- a. Denotes a plantwide limit of 23.75 tons of any combination of HAPs per year.
 b. Denotes combined annual acetophenone emission limit for SN-07, SN-12, and SN-14 of 9.90 tpy and a plantwide limit of 23.75 tons of any combination of HAPs per year.
 c. Denotes a plantwide limit of 9.5 tons of the individual HAP per year and a plantwide limit of 23.75 tons of any combination of HAPs per year.

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
SN-01	5%	§18.501 and A.C.A.

SN	Limit	Regulatory Citation
SN-02	5%	§18.501 and A.C.A.
SN-03	5%	§18.501 and A.C.A.
SN-04	5%	§18.501 and A.C.A.
SN-05	5%	§18.501 and A.C.A.
SN-09	5%	§18.501 and A.C.A.
SN-11	5%	§18.501 and A.C.A.
SN-13	5%	§18.501 and A.C.A.

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-01, SN-02, SN-03, SN-04, SN-11, and SN-13 Specific Condition

6. The permittee shall burn only pipeline quality natural gas at SN-01, SN-02, SN-03, SN-04, SN-11, and SN-13. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-06 and SN-08 Specific Conditions

7. The permittee shall not exceed 34.2 tons of VOC per year at SN-06 and SN-08 combined. The permittee shall maintain monthly records to demonstrate compliance with this specific condition. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee shall not exceed the following VOC content limits at SN-06. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	VOC Content Limit
Chemlok	6.93 lb/gal
Toluene Extender	7.18 lb/gal

9. The permittee shall not exceed the following pollutant content limits at SN-06. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	Pollutant	Pollutant Content Limit
Chemlok	Ethyl Benzene	1.54 lb/gal
	Xylene	5.39 lb/gal
Toluene Extender	Toluene	7.18 lb/gal

10. The permittee shall not exceed the following throughputs at SN-08. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	Throughput
Acetone	3,000 gallons/year
Lacquer (Telecom Cable)	60,000 pounds/year
Ink/Extender (combined)	1,300 gallons/year

11. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #10. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
12. The permittee shall not exceed the following VOC content limits at SN-08. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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Material	VOC Content Limits
M-1055 Solvent	7.5 lb/gal
Lacquer (Telecom Cable)	25% by weight
Varsol	6.34 lb/gal
Ink/Extender	9.84 lb/gal

13. The permittee shall not exceed the following pollutant content limits at SN-08. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	Pollutant	Pollutant Content Limits
Methylene Chloride Solvent	Methylene Chloride	11.0 lb/gal
M-1055 Solvent	Methyl Isobutyl Ketone	3.75 lb/gal
Lacquer (Telecom Cable)	Acetone	25% by weight
	Methanol	20% by weight
	Toluene	5% by weight
Varsol	Ethylbenzene	0.04 lb/gal
	Xylene	0.32 lb/gal
Ink/Extender	Acetone	4.02 lb/gal
	Methyl Isobutyl Ketone	3.75 lb/gal
	Toluene	4.97 lb/gal

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SN-07, SN-12, and SN-14 Specific Conditions

14. The permittee shall calculate the actual acetophenone emissions from SN-07, SN-12, and SN-14. The acetophenone emissions shall be calculated using the actual amount of material used, the manufacturer's specifications for the amount of acetophenone produced, and may assume that no less than 67% of the acetophenone produced is emitted. The acetophenone emissions shall not exceed 9.9 tpy. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #14. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
16. If the calculated actual emissions of acetophenone exceed 9.5 tpy, the permittee shall demonstrate the degree of accuracy of the calculations used to determine the emissions is sufficient to prove that the major source thresholds have not been exceeded. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. The permittee shall not use more than 30,000,000 pounds of total thermoset compounds per consecutive twelve (12) month period at SN-07. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #17. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
19. The acetophenone produced from the decomposition of cumene peroxide shall not exceed 1% by weight at SN-07, SN-12, and SN-14. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
20. The permittee shall limit the usage of acetophenone-producing thermoset compounds to a total of 99,000 pounds per day. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
21. The permittee shall maintain daily records which demonstrate compliance with Specific Condition #20. These records shall be updated by the next day following the day to which the records pertain, maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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22. The permittee shall not exceed 360 gallons of Adhesive (DOP) per consecutive twelve (12) month period at SN-07. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
23. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #22. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
24. The VOC content of the Adhesive (DOP) used at SN-07 shall not exceed 8.2 lb/gal. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
25. The di (2-ethylhexyl) phthalate content of the Adhesive (DOP) used at SN-07 shall not exceed 8.2 lb/gal. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-09 Specific Conditions

26. The permittee shall not exceed 1.4 tons of VOC per year at SN-09. The permittee shall maintain monthly records to demonstrate compliance with this specific condition. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
27. The VOC content of the Quikkote Lead Release Agent used at SN-09 shall not exceed 15% by weight. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
28. The lead dust produced from the lead jacketing operations at SN-09 shall not exceed 15,000 pounds per year. The permittee shall maintain monthly records which demonstrate compliance with this condition. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
29. The permittee shall operate the baghouse at SN-09 at all times during lead jacketing operations, and shall maintain the baghouse in good operating condition. The permittee shall conduct weekly maintenance inspections on the baghouse. A log of these inspections shall be kept on site, and made available to Department personnel upon request. [§19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-10 Specific Conditions

30. The permittee shall not exceed the following throughputs at SN-10. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	Throughput
Tape	42,000 lbs/year
Release Agent	12,000 lbs/year

31. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #30. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on site, and made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
32. The permittee shall not exceed the following VOC content limits at SN-10. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	VOC Content Limit
Tape	4% by weight
Release Agent	18% by weight

33. The permittee shall not exceed the following pollutant content limits at SN-10. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Material	Pollutant	Pollutant Content Limits
Tape	Formaldehyde	0.0061% by weight
Release Agent	Ethylene Glycol	3.5% by weight
	Formaldehyde	0.04% by weight

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Plantwide Conditions

34. The permittee shall not emit more than 9.5 tons of a single hazardous air pollutant (HAP) (excluding acetophenone; see Specific Condition #14) or 23.75 tons of any combination of HAPs (including acetophenone) from the facility in any consecutive 12 month period. [§19.405(B) of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
35. The permittee shall maintain monthly records of the HAP emissions from the facility. These records shall be updated by the fifteenth day of the month following the month to which the records pertain. Acetophenone emissions from SN-07 shall be calculated in accordance with Specific Condition #14. These records shall be kept on-site, and made available to Department personnel upon request. [§19.405(B) of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311] These records shall include the following:
 - a. the total monthly emissions for each HAP;
 - b. the consecutive 12 month total emissions for each HAP; and
 - c. the consecutive 12 month total emissions for all HAPs combined.

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an applications dated February 5, 2003 and May 21, 2007 and correspondence dated April 16, 2003.

Description	Category
One 1.0 MMBTU/hr Oven (Natural Gas)	A-1
Caustic storage tanks that contain no VOCs	A-4
Burn treater/cable burn facility for research and development – aggregate pollutant specific emissions do not exceed 5 tpy of any combination of HAPs and 10 tpy of any other pollutant (less than 1,000 pounds of cable burned per year)	A-5
Equipment used for surface coating, painting, dipping, or spraying operations, provided the material used contains no more than 0.4 lb/gal VOCs, no hexavalent chromium, and no more than 0.1 tpy of all other HAPs.	A-9

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Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
5301 Northshore Drive

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7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee shall provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences,

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including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated '8 1 106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]

CERTIFICATE OF SERVICE

I, Cynthia Hook, hereby certify that a copy of this permit has been mailed by first class mail to AmerCable, Inc., 350 Bailey Road, El Dorado, AR, 71730, on this _____ day of _____, 2007.

Cynthia Hook, AAIL, Air Division

