

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 996-AOP-R5 AFIN: 66-00041

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
8001 National Drive
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Baldor Electric Co.
5711 R. S. Boreham Jr. Street
Fort Smith, Arkansas 72901

3. PERMIT WRITER:

Wesley Crouch

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Manufacture of Electric Motors
NAICS Code: 335312

5. SUBMITTALS:

June 1, 2007

6. REVIEWER'S NOTES:

Baldor Electric Company (AFIN: 66-00041), located at 5711 R. S. Boreham Jr. St. in Fort Smith, AR, manufactures electric motors for industrial use. The facility has requested a modification to raise the annual acetone limit to 20 tons per year, add propane as an allowable fuel in Specific Condition 15, and add language to Specific Conditions 6 and 7 to clarify that compliance with the new lower HAP limits allowed by 996-AOP-R4 starts on the effective date of that permit, with the first annual demonstration of compliance to occur 12 months after that date.

7. COMPLIANCE STATUS:

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

There are no current enforcement actions against this facility.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

Has the facility undergone PSD review in the past? N

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

≥ 100 tpy and on the list of 28? N

≥ 250 tpy all other? N

PSD Netting

Was netting performed to avoid PSD review in this permit? N

Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
When complying with the HAP limits in this permit the facility will not be subject to Subpart Mmmm.		

9. EMISSION CHANGES:

The following table summarizes plantwide emission changes associated with this permitting action.

Plantwide Permitted Emissions (tpy)			
Pollutant	Permit # 996-AOP-R4	Permit #996-AOP-R5	Change
PM	0.5	0.5	0
PM ₁₀	0.5	0.5	0
SO ₂	0.7	0.7	0
VOC	203.1	203.1	0
CO	1.8	1.8	0
NO _x	2.7	2.7	0
Total HAP	9.5/23.8	9.5/23.8	0
Acetone	9.5	20	10.5

10. MODELING:

Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

Non-Criteria Pollutants:

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLV) that pass the PAER or PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

Other Modeling:

Odor:

Odor modeling for sources emitting styrene.

Pollutant	Threshold value 1-hour average	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Styrene	1361 $\mu\text{g}/\text{m}^3$	N/A	

H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards

Y

If exempt, explain: No H₂S Emissions

11. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
A	Mass Balance	N/A	Particulate Filters	99%	Assumes 100% of VOC/HAP emitted
01	Mass Balance/AP-42	AP-42 Natural gas and propane factors for burners	N/A	N/A	Assumes 100% of VOC/HAP emitted from varnish

12. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

There are no stack testing requirements in this permit.

13. MONITORING OR CEMS

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

There are no monitoring requirements in this permit

14. RECORD KEEPING 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)
A	VOC Content	7.0 lb/gal	As needed	N
A	VOC Emissions	145.5 tpy	Monthly	Y
A	HAP Content	As Per TLV Table	As needed	N
B	VOC Content	1.3 lb/gal	As needed	N
B	VOC Emissions	43.3 tpy	Monthly	Y
Facility	HAP Emissions	9.5/23.8	Monthly	Y

15. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01	5%	Dept. Guidance	Weekly Observation

16. DELETED CONDITIONS:

Former SC	Justification for removal
No conditions removed	


17. VOIDED, SUPERCEDED, OR SUBSUMED PERMITS:

List all active permits voided/superceded/subsumed by the issuance of this permit.

Permit #
966-AOP-R4

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.



Tom Rheaume, P.E.

Engineer Supervisor, Air Division

