

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1053-AR-11 AFIN: 04-00291

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Bekaert Corporation
One Bekaert Drive
Rogers, Arkansas 72756

3. PERMIT WRITER:

Andrea Sandage

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Rope, Cordage, Twine, Tire Cord, and Tire Fabric Mills
NAICS Code: 314994

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
10/2/2019 1/16/2020	Deminimis Administrative Amendment	Removed SN-23 Modified SN-26 Removed Natural Gas Emissions from SN-04 and SN-52

6. REVIEWER'S NOTES:

Bekaert Corporation owns and operates a steel cord manufacturing facility located at One Bekaert Drive, Rogers, AR 72756. The steel cord is used in the production of steel belted radial tires. This de minimis application was submitted to remove SN-23 Rinsing Bath after HCl, ISC 2 and update SN-26 Copper Pyro-Phosphate Bath, ISC 2 by adding a bath addition that will allow for larger diameter wire. The addition will utilize the stack that was previously used for SN-23. There are no changes in emissions for the modification. The facility also submitted an administrative amendment to change from fluidizing sand beds to water cooling baths on ISC 1 (SN-03, SN-04) and ISC 4 (SN-51, SN-52). The water bath for ISC 1 (SN-04) will be installed in March of 2020. The water bath for ISC 4 (SN-52) will be installed in March of 2021.

Permitted emissions decreased by 0.4 tpy HCl, 0.8 tpy SO₂, 0.8 tpy VOC, 0.8 tpy CO and 0.8 tpy NO_x.

The general conditions and insignificant activities paragraph were updated per template revisions.

7. COMPLIANCE STATUS:

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

This facility was inspected on January 15, 2019. The facility was noted as in compliance at the time of the inspection.

8. PSD APPLICABILITY:

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

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

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

If yes, explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
None identified		

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

No changes to the total permitted emission rate limits for non-criteria pollutants for this de minimis application.

c) H₂S Modeling: N/A

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
03, 04	Facility	PM/PM ₁₀	N/A	N/A	Facility assumed a small amount of particulate for the remaining process (water bath) vs the fluidized sand bed
51, 52	Facility	PM/PM ₁₀	N/A	N/A	
26	AP-42, Section 12.20, Electroplating, Table 12.20-4	PM/PM ₁₀ /Cu 2.7 x 10 ⁻⁶ grains/dscf			Demister airflow 3000 m ³ /hr EF is for copper cyanide with mesh-pad eliminator – SN-26 is copper pyrophosphate
92 & 93	Performance Test in 1994	HCl from OLW Line Pairs after scrubber = 0.07 lb/hr	Scrubber	95%	EF is after scrubber. 1000 m ³ /hr * 30 mg/m ³ = 30,000 mg/hr = 30 g/hr 30 g/hr / 454 g/lb = 0.07 lb/hr HCl

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

14. 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)
92 & 93	Pressure Drop across Pad and Stack	Manometer or equivalent instrument	Daily	N
	Flow gallons per minute	Flow Meter	Daily	N

15. 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)
92 & 93 (QZW Plate Scrubber)	Pressure Drop across Pad	50 - 110 mm (1.97 – 4.33 in) of H ₂ O	Daily	N
	Pressure Drop across Stack	100 – 350 mm (3.94 – 13.78 in) of H ₂ O	Daily	N
	Water Flow (Supply Rate)	Min 0.26 gal/min	Daily	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 06, 07, 13, 17, 22, 26, 29, 33, 38, 39, 42, 45, 49, 54, 55, 58, 61, 65, 66, 67, 68, 69, 70, 71, 72, 73, 76, 77, 80,	5%	Reg.18.501	Annual ADEQ Inspection

SN	Opacity	Justification for limit	Compliance Mechanism
83, 87, 88, 89, 90, 91, 92, 93			
04, 05, 08, 09, 10, 11, 12, 14, 15, 16, 20, 21, 24, 25, 27, 28, 30, 31, 32, 36, 37, 40, 41, 43, 44, 46, 47, 48, 52, 53, 56, 57, 59, 60, 62, 63, 64, 74, 75, 78, 79, 81, 82, 84, 85, 86	0%	Reg.18.501	Annual ADEQ Inspection

17. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Natural Gas-fired Water Heater, 0.3999 MMBtu/hr in Lube Room	A-1	0.003	0.001	0.10	0.14	0.17		
Spool Touch-up Painting Process	A-13			0.049				
One 13,536 Gallon 18% HCl Tank One 13,536 Gallon 36% HCl Tank One 3,008 Gallon 36% HCl Tank	A-13						0.63	0.63
Total for A-13				0.049			0.63	0.63

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19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1053-AR-10

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Bekaert Corporation

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			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	26.4	26.4
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	26.4	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	26.4	26.4	0
PM ₁₀	26.4	26.4	0
PM _{2.5}	0	0	0
SO ₂	8.8	8	-0.8
VOC	8.8	8	-0.8
CO	8.8	8	-0.8
NO _x	13.3	12.5	-0.8
Cu	2	2	0
ZnSO ₄	2	2	0
HCl	6.8	6.4	-0.4