

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1453-AR-2

IS ISSUED TO:

Alliance Rubber Company
210 Carpenter Dam Road
Hot Springs, AR 71903
Garland County
CSN: 26-0039

THIS PERMIT IS YOUR 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 YOUR 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:

Keith A. Michaels
Chief, Air Division

Date

SECTION I: FACILITY INFORMATION

PERMITTEE: Alliance Rubber Company
CSN: 26-0039
PERMIT NUMBER: 1453-AR-2

FACILITY ADDRESS: 210 Carpenter Dam Road
Hot Springs, AR 71901

COUNTY: Garland

CONTACT POSITION: Allan Hughes
TELEPHONE NUMBER: 501-262-2700 ext. 34

REVIEWING ENGINEER: Kale Hanner

SECTION II: INTRODUCTION

Summary

Alliance Rubber Company operates a rubber products manufacturing facility (SIC 3069) located at 210 Carpenter Dam Road, Hot Springs, Garland County, Arkansas. This facility was initially (in the 1940s) a packaging operation. The permittee has been involved in manufacturing since 1978.

This permit is being modified to reflect the addition of a salt bath curing line. This new line (SN-08) has specifications and emission limits identical to the existing curing line (SN-07). These modifications will result in an increase of the permitted emissions of VOCs by 0.9 tons per year.

Process Description

This facility receives raw materials exclusively by truck. Raw materials for this operation consist of natural and synthetic rubber, accelerators, retardants, curing agents, elemental sulfur, acids, talc, various waxes, bonding preventatives, and limestone. A storage silo is used to store the limestone needed for the process. Emissions from the silo are controlled by a small baghouse (SN-12).

To begin the process, all raw materials, with the exception of salt bath curing compounds and talc, are combined in a Banbury mixer. The materials are blended until the mixture reaches specification. The mixing reaction is exothermic. In order to maintain temperature at approximately 50⁰ F, chilled water is applied. Emissions from the reaction area are controlled by cartridge filters (SN-01). Blended material is processed, by milling, into strips suitable for extrusion. Air is blown on the strips as they are being conveyed to further cool the material. In order to minimize material adhesion, a bonding preventative is added. Blended, cooled material is then collected in bins and is transferred to the extrusion lines. There are five (5) extrusion and finishing lines. Primary particulate emissions from the extrusion process are controlled by cartridge filters (SN-02).

Cooled, milled strips of material are fed into the extruders. In order to facilitate the extrusion process, the material is electrically heated. Talc is introduced into the extrusion process to minimize the material's tendency to adhere to the extruders. Each extruder line is routed to a vacuum pump which removes air and residual moisture. Extruder lines 1 and 2 route to a common vacuum pump (SN-09), lines 3 and 4 to a common vacuum pump (SN-10), and line 5 to its own vacuum pump (SN-11). Each of these emission points removes some secondary particulate from the extrusion process. Reducing the pressure also reduces the porosity of the final product.

Once extruded, the material is run through a salt bath. There are five (5) salt baths, one for each extruder. The salt bath cures the material and also reduces its temperature. The salt bath uses a mixture of sodium and potassium nitrates and nitrites in water to complete the curing process. Each salt bath is identified as an emission point (SN-03, 04, 05, 07, and 08).

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There are no control devices on these points. Once cured, the extruded material is routed to a high-speed cutter which sizes the rubber bands. A cartridge filter was added to this area to control particulate emissions (SN-13).

Regulations

Alliance Rubber Company is subject to all applicable provisions of the Arkansas Air Pollution Control Code (Regulation 18) and the Arkansas Plan for Implementation of Air Pollution Control (Regulation 19).

The following table is a summary of the facilities total emissions.

| TOTAL ALLOWABLE EMISSIONS | | |
|---------------------------|----------------|------|
| Pollutant | Emission Rates | |
| | lb/hr | tpy |
| PM | 6.0 | 25.7 |
| PM ₁₀ | 6.0 | 25.7 |
| SO ₂ | 0.9 | 0.9 |
| VOC | 1.5 | 6.3 |

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SECTION III: PERMIT HISTORY

1453-A This is the first operating permit for Alliance Rubber (issued 6/22/93). This permit established the equipment and emission limits for the process bath curing lines and filters.

1453-AR-1 This was the first modified permit for Alliance Rubber Company (issued 3/12/96). **It was modified to reflect changes in emissions of existing cartridge filters, and the addition of the following items: one bulk limestone storage silo, a baghouse to control the silo emissions, and one cartridge filter at the rubber band cutting area.**

SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

- Pursuant to §19.501 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

| SN | Description | Pollutant | lb/hr | tpy |
|----|------------------|------------------|-------|------|
| 01 | Cartridge Filter | PM ₁₀ | 2.4 | 10.3 |
| 02 | Cartridge Filter | PM ₁₀ | 1.2 | 5.3 |
| 03 | Curing Line | PM ₁₀ | 0.2 | 0.9 |
| | | VOC | 0.2 | 0.9 |
| | | SO ₂ | 0.1 | 0.1 |
| 04 | Curing Line | PM ₁₀ | 0.2 | 0.9 |
| | | VOC | 0.2 | 0.9 |
| | | SO ₂ | 0.1 | 0.1 |
| 05 | Curing Line | PM ₁₀ | 0.2 | 0.9 |
| | | VOC | 0.2 | 0.9 |
| | | SO ₂ | 0.1 | 0.1 |
| 06 | Curing Line | PM ₁₀ | 0.2 | 0.9 |
| | | VOC | 0.2 | 0.9 |
| | | SO ₂ | 0.1 | 0.1 |
| 07 | Curing Line | PM ₁₀ | 0.2 | 0.9 |
| | | VOC | 0.2 | 0.9 |
| | | SO ₂ | 0.1 | 0.1 |
| 08 | Curing Line | PM ₁₀ | 0.2 | 0.9 |
| | | VOC | 0.2 | 0.9 |
| | | SO ₂ | 0.1 | 0.1 |
| 09 | Vacuum Pump | PM ₁₀ | 0.1 | 0.3 |
| | | VOC | 0.1 | 0.3 |
| | | SO ₂ | 0.1 | 0.1 |
| 10 | Vacuum Pump | PM ₁₀ | 0.1 | 0.3 |
| | | VOC | 0.1 | 0.3 |
| | | SO ₂ | 0.1 | 0.1 |

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| SN | Description | Pollutant | lb/hr | tpy |
|----|------------------|------------------|-------|-----|
| 11 | Vacuum Pump | PM ₁₀ | 0.1 | 0.3 |
| | | VOC | 0.1 | 0.3 |
| | | SO ₂ | 0.1 | 0.1 |
| 12 | Bag Filter | PM ₁₀ | 0.1 | 0.3 |
| 13 | Cartridge Filter | PM ₁₀ | 0.8 | 3.5 |

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

| SN | Description | Pollutant | lb/hr | tpy |
|----|------------------|-----------|-------|------|
| 01 | Cartridge Filter | PM | 2.4 | 10.3 |
| 02 | Cartridge Filter | PM | 1.2 | 5.3 |
| 03 | Curing Line | PM | 0.2 | 0.9 |
| 04 | Curing Line | PM | 0.2 | 0.9 |
| 05 | Curing Line | PM | 0.2 | 0.9 |
| 06 | Curing Line | PM | 0.2 | 0.9 |
| 07 | Curing Line | PM | 0.2 | 0.9 |
| 08 | Curing Line | PM | 0.2 | 0.9 |
| 09 | Vacuum Pump | PM | 0.1 | 0.3 |
| 10 | Vacuum Pump | PM | 0.1 | 0.3 |
| 11 | Vacuum Pump | PM | 0.1 | 0.3 |
| 12 | Bag Filter | PM | 0.1 | 0.3 |
| 13 | Cartridge Filter | PM | 0.8 | 3.5 |

3. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

| SN | Limit | Reg. Citation |
|----|-------|---------------|
|----|-------|---------------|

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| SN | Limit | Reg. Citation |
|------------|-------|---------------|
| 1, 2,12,13 | 5% | §18.501 |
| 03-11 | 20% | §19.503 |

4. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 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.
5. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.

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SECTION V: INSIGNIFICANT ACTIVITIES

The following types of activities or emissions are deemed 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 application dated March 2, 1999.

| Description | Category |
|-------------|----------|
| N/A | |

SECTION VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit which 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 which 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. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall 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 thereunder.
3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, records must be kept for five years which will 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 records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.
6. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913

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Little Rock, AR 72219

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - 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. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall 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:
 - 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 that all reasonable measures have been taken 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 shall 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, 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

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the length of time for which said limits are exceeded. If the information is included in the initial report, it need not be submitted again.

11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
 - 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
 - e. To perform an operation and maintenance inspection of the permitted source
12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued 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.
13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall 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. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

Route To: **FELICIA INMAN**
Administration

AIR DIVISION
INVOICE REQUEST FORM

(3-99)

Facility Name & Address:

Alliance Rubber Company
P.O. Box 20950
Hot Springs, Arkansas
71903

CSN: 26-0039

Permit No: 1453-AR-2

Minor Source Permit Description: MS

Initial Fee Calculations:

Minor Source = $3(18.08)$ (TPY predominant pollutant, except CO)

No less than \$500

Mod Fee Calculations:

Minor Source = $3(18.08)(0.3) = 5.42$

No less than \$400

F = \$400

Fee Amount: \$400

Engineer: Kale Hanner

Date: April 4, 2003

Public Notice

Pursuant to A.C.A. §8-4-203, and the regulations promulgated thereunder, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

[Must Contain: Facility Name; CSN; Address; Activity Involved in Permit Action; If Modification, include change in emissions; Comments may only be given on modifications]

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp, Information Officer. Citizens desiring technical information concerning the application or permit should contact Kale Hanner, Engineer. Both Rhonda Sharp and Kale Hanner can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the **[LIBRARY and ADDRESS]**. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8).

Dated this

Randall Mathis
Director