

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1453-AR-3

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Alliance Rubber Company
210 Carpenter Dam Road
Hot Springs, Arkansas 71901

3. PERMIT WRITER:

Paula Parker

4. PROCESS DESCRIPTION AND SIC CODE:

Description: Rubber Band Manufacturer, All Other Rubber Product Manufacturing
NAICS Code: 326299

5. SUBMITTALS: 4/28/06, 6/23/06, 6/26/06

6. REVIEWER'S NOTES:

The facility, as the result of an inspection, submitted a permit modification in order to incorporate an unpermitted source, a Silk Screening Area (SN-14), into their minor source permit. Also being added to this permit revision are two small sources, both of which are insignificant activities.

The source, according to plant personnel, had been in operation for several years but had failed to be included in their permit. Based upon a 40 hour work-week, it has the potential to emit 11.6 lb/hr and 12.0 tpy VOC. The facility uses no HAP-containing inks or cleaners at the source. A small amount of particulate from cutting is collected from this source as well.

The facility has two insignificant activities, a 320 gallon diesel tank (A-3) and a plastic extruder operation (A-13). The facility only processes about 25 lbs of plastic and because emission factors for similar plastic extrusion operations are very low, these emissions should be negligible.

7. COMPLIANCE STATUS: The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues

This facility is currently under no official enforcement actions. This revision is the result of a permit application that was required by Enforcement due to the presence of unpermitted sources at the facility.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera)?	N	
Has this facility undergone PSD review in the past?	N N	
Is this facility categorized as a major source for PSD?	N	
≥ 100 tpy and on the list of 28 (100 tpy)?	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 (Part 61 & Part 63), or PSD <u>only</u>]
NONE		

9. EMISSION CHANGES:

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

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 1453-AR-2	Air Permit 1453-AR-3	Change
PM/PM ₁₀	25.7	25.8	+0.1
SO ₂	0.9	0.9	0
VOC	6.3	18.3	+12.0

10. MODELING:

A. 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.

B. Non-Criteria Pollutants

The facility emits no HAP.

11. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)	
					Gallons	lb VOC/gal
14	Testing and MSDS data with facility usage records	62 lb dust per month collected	Dust collector	99.9% control for particulate	ULA LV INK Mineral Spirits Crystal Clean	27 20 1014 1639 638 2.51 7.41 7.93 6.43 6.51

12. TESTING REQUIREMENTS:

This permit requires stack testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
NONE				

13. MONITORING OR CEMS

There are no parameters for which monitoring or CEMs is required.

14. RECORD KEEPING REQUIREMENTS

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
14	Ink/Cleaning Component Usage	12.0 tpy	Monthly	N

* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

** Indicates whether the item needs to be included in reports

15. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
9-11	20	Regulation 19 limit	N/A
1,2,12,13, 14	5	Departmental Limit	N/A

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16. DELETED CONDITIONS:

The previous permit contained the following deleted Specific Conditions.

Former SC	Justification for removal
NONE	

17. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

List all active permits for this facility which are voided/superseded/subsumed by issuance of this permit.

Permit #
1453-AR-2

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Phil Murphy, P.E.