

STATEMENT OF BASIS

For the issuance of Air Permit # 1453-AR-4 AFIN: 26-00039

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Alliance Rubber Company
210 Carpenter Dam Road
Hot Springs, Arkansas 71903

3. PERMIT WRITER:

Amanda Leamons

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Rubber Product Manufacturing for Mechanical Use
NAICS Code: 326291

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
5/8/2018	Administrative Amendment	Add a Silicone Extrusion Process as an IA, A-13 activity.

6. REVIEWER'S NOTES:

The application included an Administrative Amendment request to add a silicon extrusion line and specialty printing services. During the AA review by Paula Parker the facility was asked about additional use of a rubber adhesion promotor that contained up to 80% acetonitrile and told to include it in the calculations. The permittee gave additional information concerning the amounts of the rubber adhesion promotor used and our in-house review found that if all is considered to be emitted that the emissions are potentially another 2 tons per year of both VOC and HAP. So the printing process could

not qualify as an insignificant activity under the A-13. The facility was written a partial AA approval letter on July 27, 2018 informing them that the silicon extrusion line will be added to the permit as an A-13 insignificant activity but the printing services will need to be submitted in an application for a modification to the permit. After considerable time has passed the facility has not submitted the modification application. The facility was last reminded to submit the modification application in early March 2019.

7. COMPLIANCE STATUS:

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

The facility was found out of compliance during the last inspection and currently under CAO 17-071 which was signed on September 19, 2017.

The CAO required the facility to submit a modification application to add Colorbond UV RubberBond to SN-14 or to cease using the material. The facility instead submitted an AA to add the process as an insignificant activity in May of 2018. In July of 2018 the facility was formally written a partial AA approval telling them the printing material did not qualify as an insignificant activity and again told to submit a modification. The facility has not submitted a modification application as of this date.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? N/A

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 for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
	None	

10. PERMIT SHIELD – TITLE V PERMITS ONLY: N/A

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H₂S Modeling: N/A

13. CALCULATIONS:

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

*From previous permit revision. No new emission sources were permitted with this AA, 1453-R4.

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

15. 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)
No monitoring or CEMS required				

16. 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)
14	Ink/Cleaning Component Usage: Material name, Amount used, Density, and % VOC by weight	12.0 tpy VOC	Monthly	No

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
1, 2, 12, 13, & 14	5%	18.501	N/A
3-8 & 9-11	20%	19.503	N/A

18. DELETED CONDITIONS:

Former SC	Justification for removal
No conditions removed.	

19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
320 gal Diesel Tank	A-3							
Plastic Extruder	A-13							
Silicon Extrusion Line	A-13			0.0514			0.0514	0.0514

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20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1453-AR-3

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Alliance Rubber
 Company
 Permit Number: 1453-AR-4
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			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	25.8	25.8
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)	25.8	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	25.8	25.8	0
PM ₁₀	25.8	25.8	0
PM _{2.5}	0	0	0
SO ₂	0.9	0.9	0
VOC	18.3	18.3	0
CO	0	0	0
NO _x	0	0	0