

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1630-AR-4 AFIN: 16-00275

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Thomas & Betts Corporation
5601 E. Highland Drive
Jonesboro, Arkansas 72401

3. PERMIT WRITER:

Charles Hurt, P.E.

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Noncurrent-Carrying Wiring Device Manufacturing
NAICS Code: 335932

5. SUBMITTALS:

2/9/2009

6. REVIEWER'S NOTES:

Thomas & Betts Corporation (AFIN: 16-00275) is located at 5601 E. Highland Drive, Jonesboro, AR 72401. Thomas & Betts requested a permit modification to replace PVC Line #1 (SN-27). Line #1 consists of a pre-heat oven, a PVC dip tank, a curing oven, and a baghouse. Existing Line #1 is natural gas-fired whereas the replacement will be electric heated but will have the same potential to emit limitations. The Sludge Dryer (SN-05), Coolant Solution Evaporator (SN-08), Automatic Pipe paint Booth (SN-24), Fittings Paint Booth No.1 (SN-31), Fittings Paint Booth No.2 (SN-32), Fittings Paint Booth No.3 (SN-33), Fittings Paint Booth No.4 (SN-34), Off-Spec Pipe Sandblasting (SN-41), and Pipe Primer Application (SN-44) have been removed. Overall, permitted emissions due to replacing the PVC line did not increase with this modification.

7. COMPLIANCE STATUS:

The facility was last inspected in November 2007 and determined to be operating in compliance with Permit No. 1630-AR-3.

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?

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

The facility did not identify source or pollutant applicable regulations.

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. 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 PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

Minimum Allowable TLV (mg/m ³) ^a	Maximum Allowable Single HAP Content (lb/gal) ^a
>290	8.33
290	8.33
278.5	8.00
208.9	6.00
139.3	4.00
69.6	2.00
34.8	1.00
31.3	0.90
27.9	0.80

Minimum Allowable TLV (mg/m ³)	Maximum Allowable Single HAP Content (lb/gal) ^a
24.4	0.70
20.9	0.60
17.4	0.50
13.9	0.40
10.4	0.30
7.0	0.20
3.5	0.10

a Chemicals such as HDI (CAS 822-06-0), MDI (CAS 101-68-8), and other low vapor pressure chemicals are not expected to rapidly volatilize and are emitted at a rate of less than 1.0 tpy shall be exempt from this table.

Other Modeling:

Odor:

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

12. 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)
09, 10	NYSDEC - Estimated Emissions Table A12-C	Gassing Factor = 3% to 5%	None		All HAPs below 1 tpy
11, 12, 15, 16, 17, 18, 19, 20, 21, 22, 26, 28, 30, 35, 36, 37	AP-42 Tables 1.4-1,2,3	NO _x = 100 lb/MMft ³ , etc.	None		Combustion
13, 15, 16	AP-42 Table 12.14-2	5 lb/ton	Baghouse	90%	Hot Dip Galvanizing
14	AP-42 Table 12.14-2	5 lb/ton	Scrubber	90%	Hot Dip Galvanizing

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)
23, 24, 25, 26, 27, 28, 30, 31, 32, 33, 34, 35, 36, 38, 39, 40	Material Balances and MSDS	100% Evaporation 10% overspray	Baghouse for SN-27 and SN-28		
29, 30	Engineering Estimate	0.20 gr/dscf	Baghouse	90%	
41	Engineering Estimate	0.2 gr/dscf @10,900 dscfm	Baghouse	90%	
42	Engineering Estimate	0.2 gr/dscfm @6,700 dscfm	Baghouse	90%	
43	Engineering Estimate	2.43 lb/hr VOC			
44	Engineering Estimate	2.7 lb/hr VOC			

13. TESTING REQUIREMENTS:

The permit does not require stack testing.

14. MONITORING OR CEMS

This permit does not require CEMs or any other monitoring equipment.

15. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
Plantwide	Coatings and Solvent usage	99.0 tpy VOC	Monthly	N
		9.9 tpy Single HAP 24.9 tpy Combination HAP	Monthly	N

16. OPACITY:

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
01, 09, 10, 14, 23, 24	20%	§18.501 These are uncontrolled sources, or low efficiency controls, such as paint filters.	Inspector's Observation
All other sources	5%	§18.501	Inspector's Observation

17. DELETED CONDITIONS:

This permit modification did not require any specific condition to be deleted.

18. GROUP A INSIGNIFICANT ACTIVITIES

The permittee did not propose any changes to existing insignificant activities.

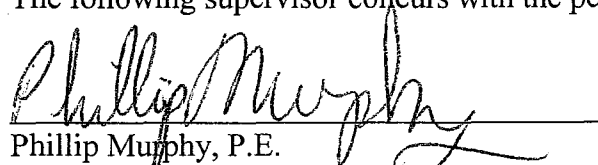
19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

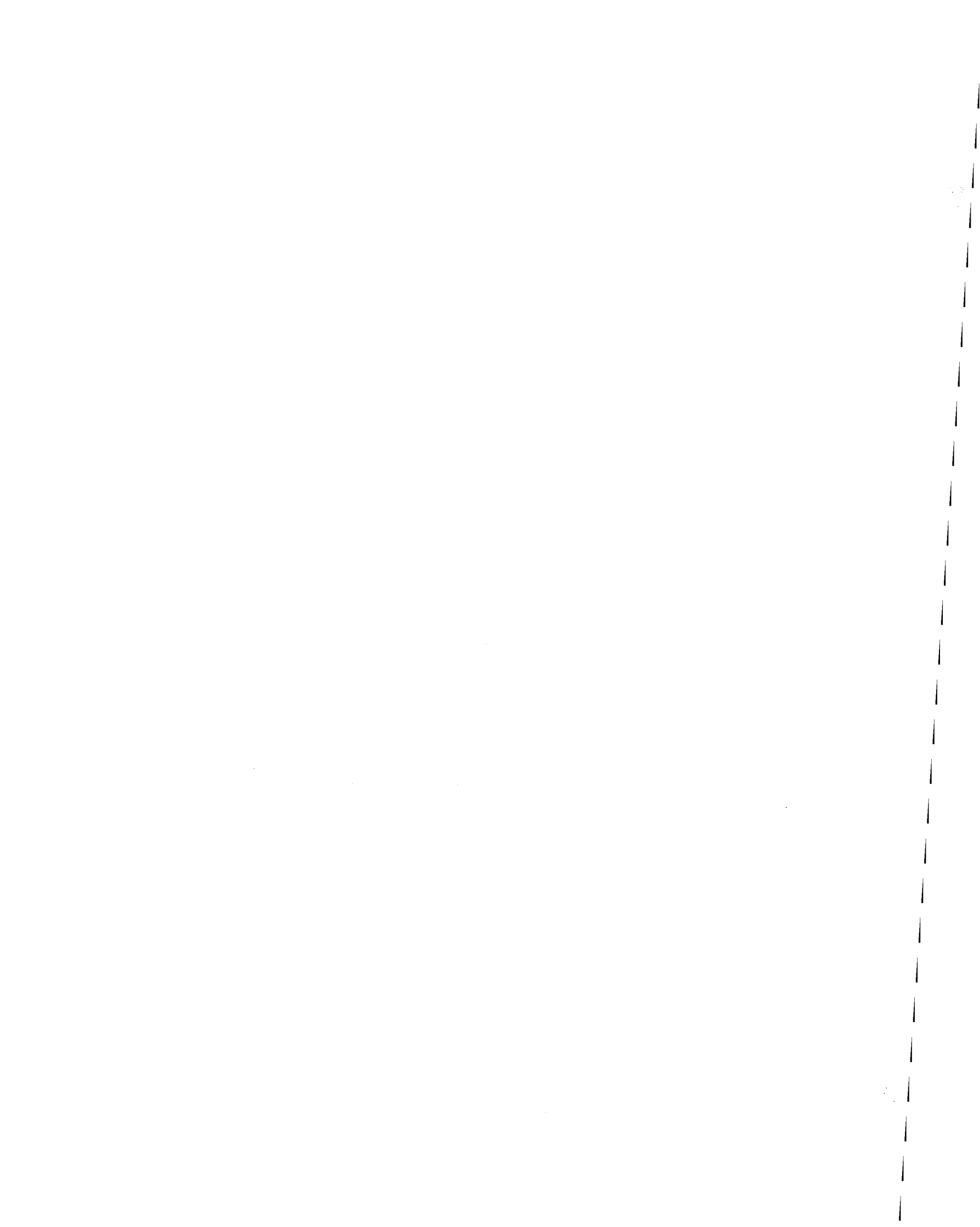
Permit #
1630-AR-3

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.


Phillip Murphy, P.E.
Engineering Supervisor, Air Division

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION



Fee Calculation for Minor Source

Facility Name: Thomas & Betts
 Corporation
 Permit Number: 1630-AR-4
 AFIN: 16-00275

\$/ton factor 22.07
 Minimum Fee \$ 400
 Minimum Initial Fee \$ 500

Check if Administrative Amendment

Permit Predominant Air Contaminant
 Net Chargeable Emission Increase
 Permit Modification Fee \$
 Initial Permit Fee \$
 Annual Chargeable Emissions (tpy)

Old Permit	New Permit
235.74	194.75
-40.99	
400	
0	
194.75	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	67.8	39.6	-28.2
PM ₁₀	67.8	39.6	-28.2
SO ₂	2.6	2.1	-0.5
VOC	99	99	0
CO	12.9	12.8	-0.1
NO _x	19.8	19.5	-0.3
Total HAP	24.9	24.9	0
Acetone	235.74	194.75	-40.99

