

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0511-AR-13 AFIN: 70-00103

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Amercable Incorporated d/b/a Nexans Americable Incorporated  
350 Bailey Road  
El Dorado, Arkansas 71730

3. PERMIT WRITER:

Shawn Hutchings

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Copper Rolling, Drawing, Extruding, and Alloying  
NAICS Code: 331420

5. ALL SUBMITTALS:

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
3/8/2017	Modification	Previously unpermitted engine
3/8/17	Deminimis	None. Adding a redundant baghouse as backup.

6. REVIEWER'S NOTES:

AmerCable, Inc. is a manufacturer of industrial cable. This facility is located in El Dorado, Union County, Arkansas. This permit adds a previously unpermitted natural gas fired emergency generator, SN-15, and adds a redundant baghouse to the Lead Jacket Operations, SN-09. A woodshop and label printing for spools in that wood shop were added to the insignificant activities list.

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 has an unpermitted engine. This issue was referred to enforcement.

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  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  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)
15	Criteria	NSPS JJJJ
15	HAPs	MACT ZZZZ

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

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

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
15	AP-42 and JJJJ limits	Varied	None		

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
9	Baghouse efficiency	97% of dust generated collected	Baghouse	97% used for conservative calculation	
SN-01 thru SN-04, SN-11, & SN-13	AP-42, Natural Gas Combustion Factors	PM/PM <sub>10</sub> : 7.6 lb/MMft <sup>3</sup> SO <sub>2</sub> : 0.6 lb/MMft <sup>3</sup> VOC: 5.5 lb/MMft <sup>3</sup> CO: 84 lb/MMft <sup>3</sup> NO <sub>x</sub> : 100 lb/MMft <sup>3</sup>	N/A	N/A	SN-01 and SN-02 are 6.5 MMBTU/hr SN-03, SN-04, SN-11, and SN-13 are 4.2 MMBTU/hr
SN-05	Thermoplastic extrusion factor from similar facility	0.191 lb VOC/ton	N/A	N/A	Hourly emission rates based on 1800 lb compound/hr. Annual emission rates based on 3,000,000 lb/yr.
SN-06	Material Balance, MSDS	VOC: Chemlok 6.93 lb/gal Toluene Extender 7.18 lb/gal HAPs: Ethyl Benzene 1.54 lb/gal Toluene 7.18 lb/gal Xylene 5.39 lb/gal	N/A	N/A	Annual emission rates based on 600 gal/yr Chemlock and 2220 gal/yr toluene extender. Hourly emission rates based on 0.1 gal/hr Chemlock and 0.5 gal/hr toluene extender.
SN-07	MSDS, Rubber Tire Manufacturing Industry	1.0 wt% acetophenone (from the decomposition of cumene peroxide) 67% of acetophenone	N/A	N/A	Hourly emission rates based on 25,850 lb/hr of acetophenone-producing compounds. Total maximum extrusion rate of 25,850 lb

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		<p>emitted based on testing</p> <p>0.002 lb VOC/25.3 lb</p> <p>Adhesive (DOP): 8.2 lb/gal VOC 8.2 lb/gal di(2-ethylhexyl)phthalate</p>			<p>compound/hr. Hourly emission rate based on 0.94 lb/hr Adhesive (DOP). Annual emission rates based on 9.9 tpy of acetophenone emissions and 30.0 MM lb/yr of total thermoset compounds. Annual emission rate based on 360 gal/yr Adhesive (DOP).</p>
SN-08	Material Balance, MSDS	<p>VOC</p> <p>M-1055: 7.5 lb/gal Lacquer (Telecom Cable): 25 wt% Varsol: 6.34 lb/gal Ink/Extender: 9.84 lb/gal HAPs</p> <p>Methylene Chloride Solvent: Methylene Chloride 11.0 lb/gal M-1055: MIBK 3.75 lb/gal Lacquer (Telecom Cable): Methanol 20 wt% Toluene 5 wt% Varsol: Ethyl benzene 0.04 lb/gal Xylene 0.32 lb/gal Acetone Acetone: 6.7 lb/gal Lacquer (Telecom</p>	N/A	N/A	<p>Hourly emission rates based on: 0.5 gal/hr Methylene Chloride, 0.5 gal/hr M-1055, 1 gal/hr acetone, 15 lb/hr Lacquer (Telecom Cable), 1 gal/hr Varsol, and 1.0 gal/hr ink/extender. Annual emission rates based on: 360 gal/yr Methylene Chloride, 360 gal/yr M-1055, 3000 gal/yr Acetone, 60000 lb/yr Lacquer (Telecom Cable), 2000 gal/yr Varsol, and 1,300 gal/yr ink/extender.</p>

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		Cable): 25 wt% Ink/Extender: Acetone 4.02 lb/gal MIBK 3.75 lb/gal Toluene 4.97 lb/gal			
SN-09	MSDS	Quickkote: 15 wt% VOC	Baghouse	97%	Hourly VOC emission rate based on 11.6666 lb/hr Quickkote. Hourly lead emission rate based on a worst case of 2000 hr/yr. Annual emission rates based on 58333.33 lb/yr Quickkote and 35,000 lb/yr lead dust produced.
SN-10	Material Balance, MSDS	Tape: VOC 4% by weight Formaldehyde 0.0061% by weight Release Agent: VOC 18% by weight Ethylene Glycol 3.5% by weight Formaldehyde 0.04% by weight	N/A	N/A	Hourly emission rates based on 250 lb/hr tape and 75 lb/hr release agent. Annual emission rates based 42,000 lb/yr tape and 12,000 lb/yr release agent.
SN-11	AP-42, Natural Gas Combustion Factors	PM/PM <sub>10</sub> : 7.6 lb/MMft <sup>3</sup> SO <sub>2</sub> : 0.6 lb/MMft <sup>3</sup> VOC: 5.5 lb/MMft <sup>3</sup> CO: 84 lb/MMft <sup>3</sup> NO <sub>x</sub> : 100 lb/MMft <sup>3</sup>	N/A	N/A	4.2 MMBTU/hr
SN-12	Rubber Tire Manufacturing Industry	Thermoset compounds: 0.002 lb VOC/25.3 lb Thermoplastic	N/A	N/A	Hourly emission rates based on 1,200 lb/hr each of thermoset, acetophenone

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		compounds: 0.191 lb VOC/ton 1.0 wt% acetophenone (from the decomposition of cumene peroxide) 67% of acetophenone emitted based on testing			producing compounds, and thermoplastic compounds. Annual emission rates based on 8760 hr/yr. Cap of 9.9 tpy acetophenone (VOC).
SN-14	Rubber Tire Manufacturing Industry	Thermoset compounds: 0.002 lb VOC/25.3 lb  Thermoplastic compounds and resin line emissions: 0.191 lb VOC/ton  1.0 wt% acetophenone (from the decomposition of cumene peroxide) 67% of acetophenone emitted based on testing	N/A	N/A	Hourly emission rates based on 750 lb/hr of thermoset/acetophenone producing compounds or thermoplastic compounds. Annual emission rates based on 8760 hr/yr. Cap of 9.9 tpy acetophenone (VOC).

## 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)
None				

#### 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)
SN-05	Thermoplastics usage	3,000,000 lb/yr	Monthly	N
SN-06 and SN-08	VOC Emissions	34.2 tons/year	Monthly	N
SN-06	MSDS (or equivalent) for VOC Content	Chemlok: 6.93 lb/gal Toluene Extender: 7.18 lb/gal	As Needed	N
SN-06	MSDS (or equivalent) for Pollutant Content	Chemlok: Ethyl Benzene 1.54 lb/gal Xylene 5.39 lb/gal Toluene Extender: 7.18 lb/gal	As Needed	N
SN-07	Thermoset Compound Usage	30,000,000 pounds/year	Monthly	N
SN-07, SN-12, and SN-14	Acetophenone Emissions	9.9 tpy	Monthly	N
SN-07	Adhesive (DOP) Usage	360 gallons/year	Monthly	N
SN-07, SN-12, and SN-14	MSDS (or equivalent)	1.0 wt% acetophenone (from the decomposition of cumene peroxide)	As Needed	N
SN-07, SN-12, and SN-14	Acetophenone-producing thermoset compounds usage	99,000 lb/day	Daily	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN-07	MSDS (or equivalent)	Adhesive (DOP): 8.2 lb VOC/gal 8.2 lb di(2-ethylhexyl)phthalate/gal	As Needed	N
SN-08	Material Throughput	Acetone 3,000 gal/yr Lacquer (Telecom Cable) 60,000 lb/yr Ink/Extender 1,300 gal/yr	Monthly	N
SN-08	MSDS (or equivalent) for VOC Content	M-1055: 7.5 lb/gal Lacquer (Telecom Cable): 25% by weight Varsol: 6.34 lb/gal Ink/Extender: 9.84 lb/gal	As Needed	N
SN-08	MSDS (or equivalent) for Pollutant Content	Methylene Chloride Solvent: Methylene Chloride 11.0 lb/gal M-1055 Solvent: MIBK 3.75 lb/gal Lacquer (Telecom Cable): Acetone 25 wt% Methanol 20 wt% Toluene 5 wt% Varsol: Ethyl benzene: 0.04 lb/gal Xylene 0.32 lb/gal Ink/Extender: Acetone 4.02 lb/gal MIBK 3.75 lb/gal Toluene 4.97 lb/gal	As Needed	N
SN-09	VOC Emissions	4.4 tons/year	Monthly	N
SN-09	MSDS (or equivalent) for VOC Content	Quickkote Lead Release Agent: 15% by wt	As Needed	N
SN-09	Material Throughput	Lead Dust Produced 35,000 pounds/year	Monthly	N
SN-09	Material Throughput	Lead Dust Produced 120 pounds/day	Daily & Monthly	N



SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN-09	Baghouse Maintenance Inspection Log	N/A	Weekly	N
SN-10	Material Throughput	Tape: 42,000 pounds/year Release Agent: 12,000 pounds/year	Monthly	N
SN-10	MSDS (or equivalent) for VOC Content	Tape: 4% by weight Release Agent: 18% by weight	As Needed	N
SN-10	MSDS (or equivalent) for Pollutant Content	Tape: Formaldehyde 0.0061% by weight  Release Agent: Ethylene Glycol 3.5% by weight Formaldehyde 0.04% by weight	As Needed	N
Plantwide	HAP Emissions	9.5 tons/year single HAP (except acetophenone) 23.75 tons/year total HAPs (include acetophenone)	Monthly	N
SN-15	Hours of Operation	500	Monthly	N
SN-15	NSPS Records	None	As needed	N

## 16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
SN-01 through SN-04, SN-11, SN-13, SN-15	5%	Department Guidance	Natural Gas Combustion
SN-05	5%	Department Guidance	---
SN-09	5%	Department Guidance	Baghouse Operation

## 17. DELETED CONDITIONS:

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Former SC	Justification for removal
	No conditions were deleted.

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Wood Shop	A-13	0.01						
Wood Shop Ink Printing	A-13			0.01				

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
0511-AR-12

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Revised 03-11-16

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		Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	56.5
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0.1
Minimum Initial Fee \$	500		
		Permit Fee \$	400
Check if Administrative Amendment	<input type="checkbox"/>	Annual Chargeable Emissions (tpy)	56.6

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