

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0511-AR-14 AFIN: 70-00103

1. PERMITTING AUTHORITY:

Division 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:

Skylar Redman

4. NAICS DESCRIPTION AND CODE:

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

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
2/14/2024	Modification	Remove SN-03, SN-11, and SN-13; Add SN-16, SN-17, and SN-18

6. REVIEWER'S NOTES:

AmerCable, Inc. is a manufacturer of industrial cable. This facility is located in El Dorado, Union County, Arkansas. This permit modification removes SN-11, SN-13, and SN-03; adds Cleaver-Brooks Boiler (6.0 MMBtu/hr) as SN-16, Cleaver-Brooks Boiler (6.0 MMBtu/hr) as SN-17, and Cleaver-Brooks Boiler (6.0 MMBtu/hr) as SN-18; and updates the responsible official information for the facility. Emission changes are as follows: an increase in 1.8 tpy of CO, 2.1 tpy of NO_x, 0.15 tpy of total HAPs, 0.03 tpy of Toluene, 0.03 tpy of Formaldehyde, 0.03 tpy of Chromium Compounds, and 0.03 tpy of POM.

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 last inspected on June 11th, 2021 with no violations identified.

https://echo.epa.gov/detailed-facility-report?fid=110000451065&ej_type=sup&ej_compare=US

8. PSD/GHG 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:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
15	Criteria	NSPS JJJJ
15	HAPs	MACT ZZZZ

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
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 DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

The non-criteria pollutants listed below were evaluated. Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Chromium Compounds Cr(III)	0.003	0.00033	0.00002472	Y
POM	0.20	0.022	0.000001557	Y

c) H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards

Y

If exempt, explain: The Facility does not emit H₂S.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
09	Baghouse efficiency	97% of dust generated collected	Baghouse	97% used for conservative calculation	
01, 02, 04, 16, 17, & 18	AP-42 Natural Gas Combustion Factors	PM/PM ₁₀ : 7.6 lb/MMft ³ SO ₂ : 0.6 lb/MMft ³ VOC: 5.5 lb/MMft ³ CO: 84.0 lb/MMft ³ NO _x : 100.0 lb/MMft ³	N/A	N/A	SN-01 and SN-02 are 6.5 MMBTU/hr SN-04 is 4.2 MMBTU/hr SN-16, SN-17, and SN-18 are 6.0 MMBTU/hr
05	Thermoplastic extrusion factor from similar facility	0.191 lb VOC/ton	N/A	N/A	Hourly emission rates based on 1,800 lb compound/hr. Annual emission rates based on 3,000,000 lb/yr.
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 2,220 gal/yr toluene extender. Hourly emission rates based on 0.1 gal/hr Chemlock and 0.5 gal/hr toluene extender.

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
07	MSDS, Rubber Tire Manufacturing Industry	<p>1.0 wt% acetophenone (from the decomposition of cumene peroxide) 67% of acetophenone 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>	N/A	N/A	<p>Hourly emission rates based on 25,850 lb/hr of acetophenone producing compounds. Total maximum extrusion rate of 25,850 lb 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 base on 360 gal/yr Adhesive (DOP).</p>
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 Methylene Chloride Solvent:</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</p>

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		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 Cable): 25 wt% Ink/Extender: Acetone 4.02 lb/gal MIBK 3.75 lb/gal Toluene 4.97 lb/gal			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/hr M-1055, 3,000 gal/yr Acetone, 60,000 lb/yr Lacquer (Telecom Cable), 2,000 gal/yr Varsol, and 1,300 gal/yr ink/extender.
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 worst case of 2,000 hr/yr. Annual emission rates based on 58,333.33 lb/yr Quickkote and 35,000 lb/yr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
					lead dust produced.
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 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 on 42,000 lb/yr tape and 12,000 lb/yr release agent.
12	Rubber Tire Manufacturing Industry	Thermoset compounds: 0.002 lb VOC/25.3 lb Thermoplastic compounds: 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 1,200 lb/hr each of thermoset, acetophenone producing compounds, and thermoplastic compounds. Annual emission rates based on 8,760 hr/yr. Cap of 9.9 tpy acetophenone (VOC).
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%	N/A	N/A	Hourly emission rates based on 750 lb/hr of thermoset

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		Acetophenone (from the decomposition of cumene peroxide) 67% of acetophenone emitted based on testing			/acetophenone producing compounds. Annual emission rates based on 8,760 hr/yr. Cap of 9.9 tpy acetophenone (VOC).
15	AP-42 and JJJ limits	Varied	N/A	N/A	N/A

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

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)
N/A				

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)
05	Thermoplastics usage	3,000,000 lb/yr	Monthly	N
06	MSDS (or equivalent) for VOC Content	Chemlok: 6.93 lb/gal Toluene Extender: 7.18 lb/gal	As Needed	N
	MSDS (or equivalent) for Pollutant Content	Chemlok: Ethyl Benzene 1.54 lb/gal Xylene 5.39 lb/gal Toluene Extender: Toluene 7.18 lb/gal		
06 and 08	VOC Emissions	34.2 tons/yr	Monthly	N
07	Thermoset Compound Usage	30,000,000 lb/yr	Monthly	N
	Adhesive (DOP) Usage	9.9 tpy		
	MSDS (or equivalent)	Adhesive (DOP): 8.2 lb VOC/gal 8.2 lb Di(2-ethylhexyl)phthalate/gal	As Needed	
07, 12, and 14	Acetophenone Emissions	9.9 tpy	Monthly	N
	MSDS (or equivalent)	1.0 wt% acetophenone (from the decomposition of cumene peroxide)	As Needed	
	Acetophenone producing thermoset compounds usage	99,000 lb/day	Daily	
08	Material Throughput	Acetone: 3,000 gal/yr Lacquer(Telecom Cable): 60,000 lb/yr Ink/Extender: 1,300 gal/yr	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	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	
	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: Xylene 0.32 lb/gal Ink/Extender: Acetone 4.02 lb/gal MIBK 3.75 lb/gal Toluene 4.97 lb/gal	As Needed	
09	VOC Emissions	4.4 tpy	Monthly	N
	MSDS (or equivalent) for VOC Content	Quikkote Lead Release Agent: 15% by wt	As Needed	
	Material Throughput	Lead Dust Produced 35,000 lb/yr	Monthly	
	Material Throughput	Lead Dust Produced 120 lb/day	Daily & Monthly	
	Baghouse Maintenance Inspection Log	N/A	Weekly	
10	Material Throughput	Tape: 42,000 lb/yr Release Agent: 12,000 lb/yr	Monthly	N
	MSDS (or equivalent) for VOC Content	Tape: 4% by weight Release Agent: 18% by weight	As Needed	
	MSDS (or equivalent) for Pollutant Content	Tape: Formaldehyde 0.0061% by weight	As Needed	

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		Release Agent: Ethylene Glycol 3.5% by weight Formaldehyde 0.04% by weight		
15	Hours of Operation	500	Monthly	N
	NSPS Records	None	As Needed	
Plantwide	HAP Emissions	9.5 tpy single HAP (except acetophenone) 23.75 tpy total HAPs (include acetophenone)	Monthly	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 04, 15 through 18	5%	Department Guidance	Natural Gas Combustion
05	5%	Department Guidance	---
09	5%	Department Guidance	Baghouse Operation

18. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

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
Wood Shop	A-13	0.01						
Wood Shop Ink Printing	A-13			0.01				

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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 #
0511-AR-13

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Amercable
 Incorporated d/b/a Nexans Amercable
 Incorporated
 Permit Number: 0511-AR-14
 AFIN: 70-00103

			<u>Old Permit</u>	<u>New Permit</u>
\$/ton factor	28.14	Permit Predominant Air Contaminant	56.6	56.6
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
		Permit Fee \$	<u>400</u>	
Check if Administrative Amendment <input type="checkbox"/>		Annual Chargeable Emissions (tpy)	<u>56.6</u>	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	2.2	2.2	0
PM ₁₀	2.2	2.2	0
PM _{2.5}	0	0	0
SO ₂	0.7	0.7	0
VOC	56.6	56.6	0
CO	12.1	13.9	1.8
NO _x	14	16.1	2.1
Lead	0.6	0.6	0
Acetophenone	9.9	9.9	0
Di (2-ethylhexyl) phthalate	1.48	1.48	0
Ethyl Benzene	0.86	0.86	0
Ethylene Glycol	0.21	0.21	0
Formaldehyde	0.01	0.04	0.03
Methanol	6	6	0
Methylene Chloride	9.5	9.5	0
Methyl Isobutyl Ketone	9.5	9.5	0
Toluene	9.5	9.53	0.03
Xylene	3.78	3.78	0
Chromium Compounds	0	0.03	0.03
POM	0	0.03	0.03
Total HAP	23.76	23.91	0.15
Acetone	20.2	20.2	0