

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0956-AR-12 AFIN: 28-00080

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

General Cable Industries  
1 Prestolite Drive  
Paragould, Arkansas 72450

3. PERMIT WRITER:

Lauren Featherston

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
1/18/2019	Modification	Adding three new printers and two stacks onto the wire drawing process

6. REVIEWER'S NOTES:

General Cable, LLC's Paragould Plant produces wire for automotive, appliance, and telecommunications use. In this significant modification, the facility seeks to add three new printers, two new stacks to SN-11, and update several other aspects of their permit. The permitted annual emission decreased by 0.1 tpy of an Individual HAP.

Added calculations and other information for SN-02, SN-06, and SN-11.

## 7. COMPLIANCE STATUS:

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

The last ADEQ Air inspection took place on July 10, 2017. No areas of concern were identified at this time. However, this facility was inspected on September 13, 2017 by the Hazardous Waste Division at ADEQ and several secondary violations were found. These issues were corrected by November 3, 2017. This information corresponds to information on ECHO which confirms the Hazardous Waste violations in September and October of 2017.

## 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

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 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)
07, 09, 10, 12	Only records of natural gas usage are required.	NSPS Subpart Dc

## 10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N  
If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
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:

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

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value ( $\text{mg}/\text{m}^3$ ), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV ( $\text{mg}/\text{m}^3$ )	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Formaldehyde	0.122	0.0135	0.00118	Y
POM	0.2	0.022	0.00118	Y

c) H<sub>2</sub>S Modeling:

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

Is the facility exempt from the H<sub>2</sub>S Standards

N

If exempt, explain: This facility does not emit H<sub>2</sub>S.

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H <sub>2</sub> S	20 parts per million (5-minute average*)		
	80 parts per billion (8-hour average) residential area		
	100 parts per billion (8-hour average) nonresidential area		

\*To determine the 5-minute average use the following equation

$$C_p = C_m (t_m/t_p)^{0.2} \text{ where}$$

$C_p$  = 5-minute average concentration

$C_m$  = 1-hour average concentration

$t_m$  = 60 minutes

$t_p$  = 5 minutes

### 13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	VOC from Mass Balance	0.00441 Lb/ton	Wet Scrubber	99%	Assumes all of Catechol is vaporized
	PM from Section 12.20-4	0.00009 lb/amp-hr			Traces of Sb and Pb
	Materials used	VOC: 2.2 lb/lb Cu Catechol: 2.2E-6/ lb Cu			
02	Based on SDS of inks and ink extenders purchased for the site	Max VOC: 7.9 lb/gal of ink	None		For pollutants whose composition aren't explicitly stated in the SDS but are listed due to Cal Prop 65, assume a max percentage of 0.1% in the ink. Assume all VOC are HAPs.
06	VOC: EPA	VOC: 0.002 lb	None		The HAP emission rate

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	Guidance for Tire Manufacturing HAP: IEEE Research, SDS and other documents	of VOC per 25.3 lb of tire produced HAP: 0.0198 lb of acetophenone per lb of extruder material used			only applies to extruder materials that contain up to 5% dicumyl peroxide which this facility is limited to 25,000 lb per year.
11	SDS for these compounds	Max VOC Content: 7.9 lb/gal Max HAP Content: 2.0 lb/gal	None		Use 3,300 gal/yr  HAP/VOC emission rates for lb/hr for SN-02,, SN-06, and SN-11 were calculated by using a worst case scenario of a typical month's worth of chemicals in one day.
07, 09, 10, 12	AP-42 1.4-1	NOx: 100 lb/MMscf VOC: 5.5 lb/MMscf SO <sub>2</sub> : 0.6 lb/MMscf CO: 84 lb/MMscf PM and PM <sub>10</sub> : 7.6 lb/MMscf Lead: 0.0005 lb/MMscf HAPs: Varied	None		Maximum heat capacity was used

## 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)
01	Scrubber downtime	720 hours per rolling 12-month period excepting times when the tin electroplating unit as a whole is down	Monthly	No
02	VOC and HAP Content	7.9 lb/gal of any ink or ink extender	Monthly	No
11	VOC and HAP Content	VOC: 7.9lb/gal HAP: 2.0 lb/gal	Monthly	No
07, 09, 10, 12	Natural gas usage	320 million cubic feet per 12 consecutive month period	Monthly	No
Facility-wide	HAPs	9.4 tons of an individual HAP and 22.5 tons of total HAPs per rolling 12 months	Monthly	No
Facility-wide	TLVs of Non-Criteria Air Pollutants	See Specific Condition #13 and 14	Monthly	No
Facility-wide	SDS Records	See Specific Condition #14	As material arrives	No
Facility-wide	VOC and NCAP records	See Specific Condition #14	Monthly	No

#### 17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 03, 06, 11	20%	§19.503	Inspector Observation
07, 09, 10, 12	5%	§18.501	Inspector Observation

## 18. DELETED CONDITIONS:

Former SC	Justification for removal
11, 12	To update this permit from using a TLV Table to using the new Department Strategy for Non-Criteria Air Pollutants
7, 8	A throughput for SN-02 is not necessary as they will comply with the VOC/HAP limits instead.

## 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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
0.195 MMBtu/hr Process Water Evaporator	A-1	0.007	0.001	0.005	0.071	0.084	0.00151	0.00158
Vent for Aluminum Oxide Fluidized Bath	A-13	0.1						

## 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 #
0956-AR-12





## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: General Cable  
Industries  
Permit Number: 0956-AR-13  
AFIN: 28-00080

			<table><tr><th>Old Permit</th><th>New Permit</th></tr><tr><td>63.2</td><td>63.2</td></tr></table>	Old Permit	New Permit	63.2	63.2
Old Permit	New Permit						
63.2	63.2						
\$/ton factor	23.93	Permit Predominant Air Contaminant	63.2				
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0				
Minimum Initial Fee \$	500						
		Permit Fee \$	400				
Check if Administrative Amendment	<input type="checkbox"/>	Annual Chargeable Emissions (tpy)	63.2				

Pollutant (tpy)	Old Permit	New Permit	Change
PM	55.6	55.6	0
PM <sub>10</sub>	55.6	55.6	0
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	0.4	0.4	0
VOC	63.2	63.2	0
CO	5.6	5.6	0
NO <sub>x</sub>	22.4	22.4	0
Total HAP	22.5	22.5	0
Individual HAP	9.5	9.4	-0.1