

STATEMENT OF BASIS

For the issuance of Draft Air Permit #1453-AR-5 AFIN: 26-00039

1. PERMITTING AUTHORITY:

Division 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:

Sterling Powers

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, De minimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
June 13, 2022	Modification	Update silk screening area emissions Add three new emergency generators Add one diesel powered fire water supply pump Remove two vacuum pumps

6. REVIEWER’S NOTES:

This permit application modification was submitted in accordance with the CAO, and updates the emission limits for the Silk Screening Area (SN-14), incorporates three (3) existing natural gas-fired emergency generators (SN-15, SN-16, and SN-17), adds one (1) existing diesel-powered fire water supply pump (SN-18), and removes two vacuum pumps (SN-09 and SN-11) . An 80-gallon diesel fuel tank for the fire water supply pump is also to be added to the list of Insignificant Activities, and process descriptions were updated. Emissions will decrease by 0.3 tpy PM₁₀ and 2.1 tpy VOC, and will increase by 0.2 tpy SO₂, 1.0 tpy NO_x, and 0.4 tpy CO.

7. COMPLIANCE STATUS:

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

The Division of Environmental Quality issued Consent Administrative Order (CAO) LIS No. 22-029 (the “Order”) to Alliance Rubber on March 22, 2022, effective May 10, 2022. The purpose of the order was to establish corrective actions to remedy air permit violations at the Hot Springs plant.

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. 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. PERMIT SHIELD – TITLE V PERMITS ONLY:

N/A

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

N/A

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. 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:

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

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor	Control Equipment	Control Equipment Efficiency	Comments																		
14	MSDS data and facility usage records	62 lb dust per month collected	Dust collector	99.9% control for particulate	<table border="0"> <tr> <td></td> <td>Gallons</td> <td>lb VOC/gal</td> </tr> <tr> <td>ULA</td> <td>27</td> <td>2.51</td> </tr> <tr> <td>LV</td> <td>20</td> <td>7.41</td> </tr> <tr> <td>INK</td> <td>1014</td> <td>7.93</td> </tr> <tr> <td>Mineral Spirits</td> <td>1639</td> <td>6.43</td> </tr> <tr> <td>Crystal Clean</td> <td>638</td> <td>6.51</td> </tr> </table>		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
		Gallons	lb VOC/gal																				
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Crystal Clean	638	6.51																					
VOC HAPs (Printing Compounds)	MSDS and Facility Usage	8	lb/gal	None	Arbitrarily increased to 8 lb/gal for future operational flexibility 1800 gal/yr																		
VOC HAPs (Mineral Spirits)	MSDS and Facility Usage	8	lb/gal	None	Arbitrarily increased to 8 lb/gal for future operational flexibility 720 gal/yr																		
15 16 17 18	AP-42, Table 3.2-2 and mass balances	Various		None	500 operational hours Natural Gas																		
18	Mfgr Emission Data, AP-42 Tables 3.3-1, 3.2-2	Various		None																			

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)
15, 16, 17	Hours of Operation	500 hr/yr for emissions, 100 hrs/yr for maintenance	Monthly	Y
18	Hours of Operation	500 hr/yr for emissions, 100 hrs/yr for	Monthly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		maintenance		

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

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	
80-gal Diesel Fuel Tank for Fire Water Supply Pump	A-2			0.01				0.01	0.01
320-gal Diesel Tank	A-3								
Plastic Extruder	A-13								
Silicon Extrusion Line	A-13			0.0514				0.0514	0.0514

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-4

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-
16

Facility Name: Alliance Rubber

Permit Number: 1453-AR-5

AFIN: 26-00039

		Old Permit	New Permit
	Permit Predominant Air Contaminant	25.8	25.6
\$/ton factor	25.13		
	Net Predominant Air Contaminant Increase	-0.2	
Minimum Fee \$	400		
Minimum Initial Fee \$	500		
	Permit Fee \$	400	
Check if Administrative Amendment	<input type="checkbox"/>		
	Annual Chargeable Emissions (tpy)	25.6	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	25.8	25.6	-0.2
PM ₁₀	25.8	25.5	-0.3
PM _{2.5}	0	0	0
SO ₂	0.9	1.1	0.2
VOC	18.3	16.2	-2.1
CO	0	0.4	0.4
NO _x	0	1	1
HAPs	0	7.6	7.6
Acetone	0	7.2	7.2