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## Air Enforcement: Arkansas Department of Energy & Environment - Division of Environmental Quality and Garland County Rubber Product Manufacturing Facility Enter into Consent Administrative Order

04/19/2022

The Arkansas Department of Energy & Environment – Division of Environmental Quality (“DEQ”) and Alliance Rubber Company (“Alliance”) entered into a March 17th Consent Administrative Order (“CAO”) addressing alleged violations of an air permit. See LIS No. 22-029.

The CAO provides that Alliance owns and operates a mechanical rubber product manufacturing facility (“Facility”) located in Garland County, Arkansas.

The Facility is stated to hold an air permit.

DEQ personnel are stated to have inspected the Facility on April 6, 2017, and identified the use of the component Colorbond UV RubberBond-Pretreatment Version 2 that contained the Hazardous Air Pollutant (“HAP”) Acetonitrile. Further, CAO (LIS 17-071) is stated to have been executed in 2017 in which Alliance agreed to either immediately cease use of Colorbond UV RubberBond-Pretreatment Version 2 or submit a permit modification application allowing the use of this HAP at the Silk Screening Area.

Alliance is stated to have requested in 2017 through an Administrative Amendment to Air Permit R3 the addition of this HAP usage at SN-14 as an insignificant activity. DEQ is stated to have notified Alliance that an Administrative Amendment to Permit R3 could not be completed to allow for the usage of this HAP as an insignificant activity and that a permit application would need to be submitted.

Alliance is stated to not to date to have submitted a permit application to incorporate the use of this HAP at SN-14. This is alleged to constitute a failure of Specific Condition 7 of certain air permits.

DEQ personnel are stated to have performed a compliance inspection on June 9, 2021, of the Facility. The inspection is stated to have covered the reporting period of May 2017 through April 2021.

The inspection is stated to have determined that Alliance failed to provide records of total VOC emissions for the use of 24349 Rubber Adhesion Promoter and Colorbond UV RubberBond-Pretreatment Version 2 at SN-14 for the period of May 2017 through April 2021 violating Special Condition 6 of Permit 3 and Permit 4.

The inspection is also stated to have determined that Alliance used HAP containing components 24349 Rubber Adhesion Promoter and Colorbond UV Rubber Bond-Pretreatment Version 2 prior to obtaining a permit modification violating Specific Condition 7 of Permit R3 and Permit R4. Also, the inspection is stated to have determined that Alliance installed and operated an Emergency Diesel Fire Pump and three natural gas generators without a permit.

In response to a DEQ query, Alliance stated that a permit modification would be submitted to address the Acetonitrile containing components and the addition of the emergency fire pump and three emergency generators. Alliance further stated that updated VOC calculations would be provided. In January 20th correspondence Alliance stated that the Facility would be making the necessary permitting modifications to include the unpermitted sources and would be updating recordkeeping methodology to restore the Facility's compliance status.

Alliance neither admits nor denies the factual and legal allegations contained in the CAO.

Within 30 calendar days of the effective date of the CAO Alliance is required to:

- Submit a permit modification application to address the alleged violations in paragraphs 14 and 16 of the Findings of Fact
- Submit records showing compliance with Specific Condition 6 for a period of six months

A civil penalty of \$22,000 is assessed.

A copy of the CAO can be downloaded [here](#).