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Air Enforcement: Arkansas Department of Environmental Quality and Garland County, Arkansas Rubber Products Manufacturing Facility Enter into Consent Administrative Order

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The Arkansas Department of Environmental Quality (“ADEQ”) and Alliance Rubber Company (“ARC”) entered into a September 13th Consent Administrative Order (“CAO”) addressing an alleged violation of an air permit. See LIS No. 17-071.

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

The Facility holds an Air Permit which was issued on September 14, 2006.

ADEQ is stated to have conducted an inspection of the Facility on April 6, 2017 which allegedly indicated that the Facility was using the component ColorBond UV RubberBond – Pretreatment Version 2 that contained Acetonitrile. This component is stated to be a Hazardous Air Pollutant (“HAP”), at the Silk Screen Area (“SN-14”).

The CAO states that Specific Condition 7 of the Facility’s permit only authorizes the use of an HAP containing component at SN-14 with the submittal of a permit modification. It is alleged that at the time of inspection, the Facility had not submitted a permit modification to allow the use of a HAP containing component at SN-14.

ADEQ is stated to have informed ARC of the alleged violation to which the Facility has not responded.

The CAO requires that ARC:

- Cease use immediately of that Colorbond UV RubberBond – Pretreatment Version 2
- Within 30 days of the effective date of the CAO, submit a permit modification application allowing the use of the HAP containing component at SN-14 if the Facility wishes to continue use of Colorbond UV RubberBond – Pretreatment Version 2
- Within 30 days of the effective date of the CAO, provide to ADEQ in writing the usage decision regarding the HAP containing component at SN-14

The CAO assesses a civil penalty of \$1,000. The civil penalty is reduced by \$500 if the CAO was signed and returned to ADEQ by September 15th.

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

