

## **STATEMENT OF BASIS**

for the issuance of Draft Air Permit # 2042-A

### **1. PERMITTING AUTHORITY:**

Arkansas Department of Environmental Quality  
8001 National Drive  
Post Office Box 8913  
Little Rock, Arkansas 72219-8913

### **2. APPLICANT:**

Cryovac, Inc. a subsidiary of Sealed Air Corporation  
4 Bekaert Drive  
Rogers, Arkansas 72756

### **3. PERMIT WRITER:**

Paul Osmon

### **4. PROCESS DESCRIPTION AND NAICS CODE:**

NAICS Description: plastic bag manufacturing  
NAICS Code: 326111

### **5. SUBMITTALS:**

April 23, 2003

### **6. REVIEWER'S NOTES:**

Cryovac, Inc. (a subsidiary of Sealed Air Corporation) (Cryovac) is constructing a plant to manufacture and print plastic bags for the food processing industry located at 4 Bekaert Drive in Rogers. Emissions from the facility will consist of ozone, volatile organic compounds, and products of combustion of natural gas. This permit is the initial permit for the construction and operation of the facility. The facility will use a hard wired interlock to prevent operation of the presses without the proper RTO temperature.

### **7. COMPLIANCE STATUS:**

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

This permit is for the construction and operation of a new facility. A CAO has been issued to allow the construction of the facility while the permit application is processed.

**8. APPLICABLE REGULATIONS:**

**PSD Applicability**

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera?)	Y/N	N
Has this facility undergone PSD review in the past?	Y/N	Permit# N
Is this facility categorized as a major source for PSD?	Y/N	N
\$ 100 tpy and on the list of 28 (100 tpy)?	Y/N	N
\$ 250 tpy all other	Y/N	N

**PSD Netting**

Was netting performed to avoid PSD review in this permit?	Y/N	N
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Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
Facility	None	NA

**9. EMISSION CHANGES:**

The following table summarizes plant wide emission changes associated with this permitting action.

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	No Previous Air Permit	Air Permit 2042-A	Change
PM/PM <sub>10</sub>		0.7	0.7
SO <sub>2</sub>		0.3	0.3
VOC		60.0	60.0

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	No Previous Air Permit	Air Permit 2042-A	Change
CO		5.9	5.9
NO <sub>x</sub>		7.6	7.60
Ozone		5.6	5.6

**10. MODELING:**

**Criteria Pollutants**

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

**11. Non-Criteria Pollutants**

The permittee uses solvents and inks that do not contain HAPs and the permit has a S.C. that limits HAP usage to trace quantities.

**12. CALCULATIONS:**

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type ( if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
SN001 SN002	testing	NO <sub>x</sub> – 0.064 Ozone – 0.867	None	NA	Emission factors (lb/hr) based on 1991 Tests conducted by Galson Technical Services at a similar facility
SN003 SN004	Vendor data	Ozone – 0.37	None	NA	Emission factor units is lb/hr
SN005	Material balance	VOC -Actual usages	RTO	90 % capture 98% - destruction	Emission factor for inks and solvents used
SN005	AP-42 natural	NO <sub>x</sub> – 100	None	NA	Emission factors for

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type ( if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
	gas combustion	CO – 84 PM – 7.6 VOC – 5.5 SO <sub>2</sub> – 0.6			dryers are in lb/10 <sup>6</sup> scf
SN006 SN007	AP-42 natural gas combustion	NO <sub>x</sub> – 100 CO – 84 PM – 7.6 VOC – 5.5 SO <sub>2</sub> – 0.6	None	NA	Emission factors for boilers are in lb/10 <sup>6</sup> scf
SN008	Material balance	Lbs	None	NA	Non-point emissions are the 10% inks and solvents that escape the capture system, ink blending, and solvent handling vaporization.

**13. TESTING REQUIREMENTS:**

This permit requires stack testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
No stack testing this permit.				

**14. MONITORING OR CEMS**

The permittee must monitor the following parameters with CEMs or other monitoring equipment (temperature, pressure differential, etc), frequency of recording and the need for records included in any annual, semiannual or other reports.

SN	Parameter or Pollutant to be Monitored	Method of Monitoring (CEM, Pressure Gauge, etc)	Frequency*	Report (Y/N)**
No monitoring or CEMS				

\* Indicate frequency of recording required for the parameter (Continuously, hourly, daily, etc.)

\*\* Indicates whether the parameter needs to be included in reports.

**15. RECORD KEEPING REQUIREMENTS**

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
Facility	VOC Usage	501 tons / 12 months	Monthly	N
Facility	HAP Content in inks and solvents	0.1 weight percent maximum	Monthly	N

\* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

\*\* Indicates whether the item needs to be included in reports

**16. OPACITY**

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
SN-001 through SN-007	5%	Department Guidance	Fuel used

**17. DELETED CONDITIONS:**

The previous permit contained the following deleted Specific Conditions.

Former SC	Justification for removal
	Initial Permit

**18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS**

List all active permits voided/superseded/subsumed by issuance of this permit for this facility.

Permit #
Initial permit

**19. CONCURRENCE BY:**

The following supervisor concurs with the permitting decision:

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Thomas Rheume, P.E.