

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 2042-AR-1

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: November 30, 2004

6. REVIEWER'S NOTES:

Cryovac, Inc. (a subsidiary of Sealed Air Corporation) (Cryovac) is a plant that manufactures and prints plastic bags for the food processing industry located at 4 Bekaert Drive in Rogers. Emissions from the facility consist of ozone, volatile organic compounds, and products of combustion of natural gas. The facility uses a hard wired interlock to prevent operation of the presses without the proper RTO temperature. This modification is issued to allow a minor amount of HAP in the inks and solvents used (even though none are anticipated).

7. COMPLIANCE STATUS:

The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues: There are no active/pending enforcement action or recent compliance activities related to this facility.

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]
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	Air Permit #2042-A	Air Permit #2042-AR-1	Change
PM/PM ₁₀	0.7	0.7	0
SO ₂	0.3	0.3	0
VOC	60.0	60.0	0
CO	5.9	5.9	0

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	Air Permit #2042-A	Air Permit #2042-AR-1	Change
NO _x	7.6	7.6	0
Ozone	5.6	5.6	0
Total HAP	0	2.5	2.5

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.

Other Modeling

No Styrene or H₂S emissions at this facility.

11. Non-Criteria Pollutants

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department deemed PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11*TLV	Proposed lb/hr	Pass?
Pseudo	20	2.2	2.2	Y

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 _x – 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 gas combustion	NO _x – 100 CO – 84 PM – 7.6 VOC – 5.5 SO ₂ – 0.6	None	NA	Emission factors for dryers are in lb/10 ⁶ scf
SN006 SN007	AP-42 natural gas combustion	NO _x – 100 CO – 84 PM – 7.6 VOC – 5.5 SO ₂ – 0.6	None	NA	Emission factors for boilers are in lb/10 ⁶ scf

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)
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 in 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 in this permit.				

* 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	1.0 weight percent maximum	Monthly	N
Facility	HAP Emissions	No limit but tpy totals to be calculated	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
	None

18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

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AFIN: 04-00715
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List all active permits voided/superseded/subsumed by issuance of this permit for this facility.

Permit #
2042-A

19. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Thomas Rheume, P.E.