

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2042-AR-2 AFIN: 04-00715

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

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

3. PERMIT WRITER:

Shawn Hutchings

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Plastics Bag Manufacturing  
NAICS Code: 326111

5. SUBMITTALS:

11/19/2007

6. REVIEWER'S NOTES:

Cryovac, Inc. (a subsidiary of Sealed Air Corporation) (Cryovac) owns and operates 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. This modification adds a new 10 color flexographic printing press which will include a small corona treater, SN-11. The emissions from the press will be added to the existing printing operation sources, SN-05 and SN-08. Also a new Barrier Extrusion Cross Linking Unit, SN-09, will be added. The power rating for two existing Tape Cross Linking Units, SN-01 and 02 will be increased. This modification also adds a Die Cleaning Oven, SN-10

7. COMPLIANCE STATUS:

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

There are no known enforcement actions against the facility.

8. PSD APPLICABILITY:

- a. Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
- 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, explain why this permit modification not PSD?

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
This facility is subject to no specific regulations.		

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. 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

Non-Criteria Pollutants:

This permit contains a TLV limit based on the PAER. No modeling was performed.

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
HAP	29	3.2	3.2	Yes

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
HCl	7.45	0.8	0.25	Yes

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
11	Manufacturer data	0.73 lb ozone/kW	None	N/A	
5	Material balance	N/A	RTO	98% destruction	
8	Material balance	N/A			
9	Test data	Formula	None		
10	Manufacturer Test data	Varied	None		

13. TESTING REQUIREMENTS:

The permit requires no testing.

14. MONITORING OR CEMS

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

No monitoring is required.

15. 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)
5 and 8	VOC and HAP content and usage	Varied	Monthly	N
1, 2, 9	Power setting	75 mA	Per shift, or physically constrain so limit cannot be exceeded.	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
10	Hours of operation	2912 hrs	Monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
SN-01 SN-02 SN-03 SN-04 SN-05 SN-06 SN-07 SN-09 SN-11	5%	Department Guidance	Inspector to verify on inspection.
SN-10	20%	Department Guidance	Inspector to verify on inspection.

17. DELETED CONDITIONS:

Former SC	Justification for removal
	No conditions were removed

18. GROUP A INSIGNIFICANT ACTIVITIES

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
No changes were made to insignificant activities.								

19. VOIDED, SUPERCEDED, OR SUBSUMED PERMITS:

List all active permits voided/superceded/subsumed by the issuance of this permit.

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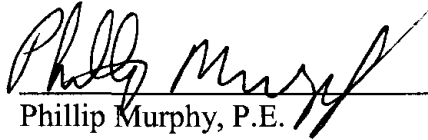
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20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

  
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Phillip Murphy, P.E.





