

Response to Comments

Yrovac, Inc. a subsidiary of Sealed Air Corporation
AFIN# 04-00715, Permit 2042-AR-2

On or about May 7th, 2008, the Director of the Arkansas Department of Environmental Quality gave notice of the draft permitting decision for the above referenced facility. During the comment period one interested people submitted written comments, data views, or arguments on the draft permitting decision. The Department's response to these issues and comments follows.

Comment 1: The total allowable emission table needs to be updated to 93.0 tpy of VOC and 22.8 tpy of ozone.

Response 1: The 90.6 tpy for VOC in the draft permit is correct. The 93.0 you requested includes insignificant activities. Insignificant activities are not included in the facility's total emissions. The VOC emission rate was not changed. The Ozone emission rate change was due to correcting emission rates of sources. That change was made.

Comment 2: Cyrovac requested correcting the emission rates in Specific Condition 2 to those specified in the permit application.

Response 2: The Department agrees. The requested change was made.

Comment 3: The emission limit requested for VOC in the permit is based on a 697 ton per year usage rate. The usage limit in the permit needs to be updated from the 501 tpy of previous permits.

Response 3: The Department agrees. The requested change was made.

Comment 4: Specific Condition 9 needs to be updated to HAP emission limit in Specific Condition 2.

Response 4: The Department agrees. The requested change was made.

Comment 5: Specific Condition 16 refers to only two presses instead of three.

Response 5: The Department agrees. The requested change was made.

ADEQ

ARKANSAS
Department of Environmental Quality

June 12, 2008

Steve Holt
Quality/Environmental Engineer
Cryovac, Inc., a subsidiary of Sealed Air Corp.
4 Bekaert Drive
Rogers, AR 72756

Dear Mr. Holt:

The enclosed Permit No. 2042-AR-2 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 3/11/2008.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 2042-AR-2 for the construction, operation and maintenance of an air pollution control system for Cryovac, Inc., a subsidiary of Sealed Air Corp. to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under §2.1.14 of Regulation No. 8, Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, within thirty (30) days after service of this decision.

All persons submitting written comments during this thirty (30) day period, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by §2.1.14 of Regulation No. 8.

Sincerely,



Mike Bates
Chief, Air Division

ADEQ MINOR SOURCE AIR PERMIT


Permit No. : 2042-AR-2

IS ISSUED TO:

Cryovac, Inc., a subsidiary of Sealed Air Corporation
4 Bekaert Drive
Rogers, AR 72756
Benton County
AFIN: 04-00715

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:


Mike Bates
Chief, Air Division

June 12, 2008
Date

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: Cryovac, Inc., a subsidiary of Sealed Air Corporation
AFIN: 04-00715
PERMIT NUMBER: 2042-AR-2
FACILITY ADDRESS: 4 Bekaert Drive
Rogers, AR 72756
MAILING ADDRESS: 4 Bekaert Drive
Rogers, AR 72756
COUNTY: Benton
CONTACT POSITION: Stephen Holt, Quality/Environmental Manager
TELEPHONE NUMBER: (479) 619-3546
REVIEWING ENGINEER: Shawn Hutchings
UTM North South (Y): Zone 15: 4023.45883
UTM East West (X): Zone 15: 395.66532

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Section II: INTRODUCTION

Summary of Permit Activity

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.

Process Description

The Rogers, AR plant produces plastic bags for the food packing industry. This process utilizes extrusion of polyolefin resins to form plastic "tape", stretching the tape to produce a thin "tubing", which is then printed with customer specified labels (or logos) and formed into bags that are sealed on one end. Corn starch powder is applied to the tubing during the bag making process to lubricate the material before being boxed for shipment to the customer. Process areas are designed to comply with applicable food laws and must be operated to maintain compliance with food grade standards.

The resins, which arrive in pellet form from the supplier via truck and rail, are handled using resin conveying equipment. The resins are stored in six (6) large silos and in smaller bins and boxes.

Once the tape is extruded on the extrusion lines, it is crosslinked by an Electronic Cross Linking Unit (ECLU) to provide certain functional characteristics. The ECLU forms ozone and trace NO_x due to inadvertent ionization of cooling air. The ECLUs are vented to the atmosphere for industrial hygiene purposes. The emissions points for these ozone emissions are SN-01, SN-02, and SN-09.

The crosslinked tape is then heated for softening and stretched to produce a thinner intermediate product called tubing in a process called "racking". This tubing is then wound into rolls and staged for printing and/or bagmaking. The extrusion process uses electric heat as well as steam in order to form the plastic structures.

In the printing process, but before ink is applied, the tubing first passes through a surface treater mounted on the printing press to create a surface condition that will accept the inks. The treater also creates small quantities of ozone due to the ionization of the oxygen in the air. This small amount of ozone is also vented to the atmosphere for industrial hygiene purpose. The emission points are SN-03, SN-04, and SN-11 for the presses.

The printing process uses flexographic printing techniques to create a printed image on the plastic tubing. The presses have 10 color stations, but many print orders will not require all 10

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colors. The presses have dryers between flexo stations and a drying tunnel to complete the process before being rewound into printed rolls destined for bag making.

The captured emissions from the printing operation will go to a regenerative thermal oxidizer (RTO) unit for control of VOCs. The capture efficiency of the solvents at the printers is at least 90%, and the destruction efficiency of the RTO unit is at least 98% for the VOCs that are captured. This will provide an overall destruction efficiency of at least 88.2%. The emission point for all RTO emissions is SN-05.

The inks used in printing are blended on site for proper color and viscosity. The inks and solvents used in this process contain less than 1.0% of any single Hazardous Air Pollutants (HAPs), or less than 0.1% weight percent for any HAP that is defined as a carcinogen by US OSHA. The solvents are blends of typical flexographic solvents such as acetates and alcohols. These solvents are stored in above ground tanks, drums and smaller containers. The inks are made from organic resins, pigments, and plasticizers by suppliers.

The bag making process uses a heated wire to cut the bags to length and seal one end of short sections of tubing. Corn starch powder is used to aid in the manufacture of the plastic bags and for improved handling of the finished bags by the customer. There are no particulate matter emissions from this operation due to a closed loop starch handling systems. Six (6) bag machines are equipped with logo printing capabilities. Solvent based inks shall be used as part of the logo printing operations, while the VOCs are uncontrolled and included as part of SN-08.

Two boilers supply steam to the facility, with one of these boilers for backup use only. The boiler stacks are designated as emission points SN-06 and SN-07. A die cleaning oven (SN-10) is used to remove small quantities of resin from the die equipment using a natural gas fired afterburner. The plant has a small electrical generator for emergency power.

The finished bags are boxed and shipped to customers via truck. Some semi-finished tubing may also be shipped to other Cryovac locations for converting.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective October 15, 2007

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Total Allowable Emissions

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TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	0.4	0.8
PM ₁₀	0.4	0.8
SO ₂	0.4	0.4
VOC	48.2	90.6
CO	1.6	6.2
NO _x	2.1	8.6
HAP	3.3	5.1
Ozone	5.27	22.82
HCl	0.25	0.04

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Section III: PERMIT HISTORY

Permit 2042-A was issued to Cryovac Inc. a subsidiary of Sealed Air Corporation on October 16, 2003 for the initial construction and operation of the facility. Permit limits in the initial permit were: PM/PM₁₀ – 0.7 tpy, SO₂ – 0.3 tpy, VOC – 60.0 tpy, CO – 5.9 tpy, NO_x – 7.6 tpy and Ozone – 5.6 tpy

Permit 2042-AR-1 was issued to Cryovac Inc. a subsidiary of Sealed Air Corporation on May 5, 2005. This modification was issued to allow minor quantities of hazardous air pollutants in the inks and solvents used at the facility (even though none are anticipated).

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Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 19, §19.501 et seq., effective October 15, 2007 and A.C.A. §8-4-203 as
 referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
SN-01	Tape Extrusion Cross Linking Unit- Line 1	NO _x	0.1	0.4
SN-02	Tape Extrusion Cross Linking Unit- Line 2	NO _x	0.1	0.4
SN-05	Regenerative Thermal Oxidizing Unit – Printing Press 1 Printing Press 2 Printing Press 3	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	7.1	12.6
		CO	0.3	0.8
		NO _x	0.3	1.0
SN-06	Boiler No. 1 Natural Gas Fuel 7 MMBtu/hr	PM ₁₀	0.1	0.3
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.6	2.6
		NO _x	0.7	3.1
SN-07	Boiler No. 2 Natural Gas Fuel 7 MMBtu/hr	PM ₁₀	0.1	0.3
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.6	2.6
		NO _x	0.7	3.1
SN-08	Non-point Source Emissions – (Printing emissions not captured)	VOC	40.8	77.5
SN-09	Barrier Extrusion Cross Linking Unit – Line 3	NO _x	0.1	0.4

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SN-10	Die Cleaning Oven	PM ₁₀	0.1	0.1
		SO ₂	0.1	0.1
		VOC	0.1	0.1
		CO	0.1	0.2
		NO _x	0.1	0.2

2. The permittee shall not exceed the emission rates set forth in the following table. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
SN-01	Tape Extrusion Cross Linking Unit- Line 1	Ozone	1.31	5.74
SN-02	Tape Extrusion Cross Linking Unit- Line 2	Ozone	1.31	5.74
SN-03	Surface Treater – Printing Line No.1	Ozone	0.37	1.60
SN-04	Surface Treater – Printing Line No.2	Ozone	0.37	1.60
SN-05	Regenerative Thermal Oxidizing Unit – Printing Press 1 Printing Press 2 Printing Press 3	PM HAPs	0.1 0.5	0.1 0.3
SN-06	Boiler No. 1 Natural Gas Fuel 7 MMBtu/hr	PM	0.1	0.3
SN-07	Boiler No. 2 Natural Gas Fuel 7 MMBtu/hr	PM	0.1	0.3
SN-08	Non-point Source Emissions – (Printing emissions not captured)	HAPs	2.8	4.8
SN-09	Barrier Extrusion Cross Linking Unit – Line 3	Ozone HCl	1.31 0.25	5.74 0.04
SN-10	Die Cleaning Oven	PM	0.1	0.1
SN-11	Printing Line 3 – Surface Treater	Ozone	0.6	2.4

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3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
SN-01	5%	§18.501
SN-02		
SN-03		
SN-04		
SN-05		
SN-06		
SN-07		
SN-09		
SN-11		
SN-10	20%	§19.501

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. The permittee will not use more than 697 tons of volatile organic compounds by material balance in the inks and solvents at the facility per consecutive 12-month period. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
7. The permittee shall only use inks or solvents that contain less than 4% by weight total HAP and 1% by weight of any single HAP in the printing materials used. All HAPs used in concentrations greater than 0.1% shall have a TLV greater than 29 mg/m³. The HAP content as stated on the MSDS sheet will be used for verifying that the HAP content meets this condition of the permit. [§18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee will maintain monthly records which demonstrate compliance with Specific Condition No. 6 and 7. Records of the volatile organic compound usage shall be in the form of a material balance and the content records shall consist of MSDS sheets for each compound used. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the

records onsite, and make the records available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

9. The permittee shall not exceed total HAP emissions of 5.1 tons per 12 month rolling total. The permittee will maintain monthly records and 12 month rolling totals of the usage of each HAP in the inks and solvents used at the facility and the estimated emissions from their usage. The estimated emissions calculations shall be based on 90% capture and 98% destruction efficiencies. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [§18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-01, 02, 03, 04, 09 and 11 Conditions

10. The maximum power output from SN-03 and SN-04 shall not exceed 25 kW per unit. [§18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
11. The maximum power output from SN-11 shall not exceed 7.5 kW per unit. [§18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
12. The permittee shall not exceed a maximum power rating of 75 mA (milliamps) at SN-01, SN-02, and SN-09. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
13. The permittee shall either install controls in such a way that it would be impossible for sources SN-01, 02, and 09 to exceed the 75mA limit or maintain records of power setting. If the permittee elects to maintain the records, then the power setting shall be read once per shift. The records of the power setting level readings shall be kept on site and made available to department personnel upon request. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

SN-05 Conditions

14. The permittee shall maintain a combustion zone temperature in the regenerative thermal oxidizer, SN-05, in excess of 1,400° Fahrenheit. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
15. The permittee shall operate all presses with a hard wired override which prevents operating the presses unless the RTO combustion zone temperature is in excess of 1,400° Fahrenheit. Any provision for by-pass of this interlock shall be keyed switch controlled with keys only available to management level employees. A log shall be maintained at the switch/valve of each press exhaust for the purpose of recording each time the exhaust is vented to the atmosphere. This log shall include the time of the occurrence, the volume of ink used, the length of the production run and the VOC content of the ink. [§19.705 of Regulation 19, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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16. The permittee shall keep all doors normally closed on the presses as well as maintain all guards and covers in place. The permittee shall annually evaluate the presses to assure they are maintained to original specifications and balanced to original settings. A record of such evaluation shall be maintained on site and made available to Department personnel upon request. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

SN-06 and SN-07 Conditions

17. The permittee shall only use pipeline quality natural gas as a fuel in the regenerative thermal oxidizer and the boilers at this facility. Pipeline quality natural gas is defined as gas which contains less than 0.3 grains/100 SCF of H₂S and that H₂S constitutes greater than 50% by weight of the sulfur by weight in the natural gas. [§19.705 of Regulation 19, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 70.6]

SN-10 Conditions

18. The permittee shall not operate the Die Cleaning Oven, SN-10, in excess of 2,912 hours in any consecutive 12 month period. Operation includes only time when the unit is being fired not when it is cooling down until the metal parts can be removed. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
19. The permittee shall maintain daily records of the hours of operation of SN-10 to show compliance with SN-17. These records shall be updated daily. Calculations showing operating hours over the consecutive 12 month period shall be updated monthly by the 15th of the month. These records shall be kept on site and made available to Department Personnel upon request. [§19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated November 30, 2004.

Description	Category
Resin unloading, transfer systems, and storage silos	Group A, No. 13
Laboratory Operations	Group A, No. 5
Emergency Generator	Group A, No. 13
Plate Making	Group A, No. 13
Slitting and Rewinding Operations	Group A, No. 13
Bag cutting, Sealing, and Packaging.	Group A, No. 13
Corn Starch Handling	Group A, No. 13

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Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
5301 Northshore Drive

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North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee shall provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences,

including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to Cryovac, Inc., a subsidiary of Sealed Air Corp., 4 Bekaert Drive, Rogers, AR, 72756, on this 12th day of June, 2008.

Pam Owen

Pam Owen, AAI, Air Division

