

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2041-AR-3 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 and Pouch Manufacturing  
NAICS Code: 326111

5. SUBMITTALS:

2/10/2012

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 Printing Press Line #4. The new press is included with SN-05 which includes the other presses at the facility. All the presses are routed to an RTO. Uncaptured emissions from the presses are accounted for in SN-08. Also in this modification, a new corona treater, SN-12 is being added.

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 issues with 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 is not PSD?

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Insignificant Emergency Generator	HAPS	RICE MACT 40 CFR Part 63 Subpart ZZZZ

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 table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLV) that pass the PAER or PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

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	10% uncaptured			

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

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.)

There are no monitoring or CEMS 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
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	5%	Department Guidance	Inspector to verify on inspection.

SN	Opacity	Justification for limit	Compliance Mechanism
SN-11 SN-12			
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, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
2042-AR-2

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

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Phillip Murphy, P.E.

**APPENDIX A – EMISSION CHANGES AND FEE CALCULATION**

## Fee Calculation for Minor Source

Revised 08-30-11

Cryovac, Inc., a subsidiary of Sealed Air Corp.

Permit #: 2041-AR-2

AFIN: 04-00715

			Old Permit	New Permit
\$/ton factor	22.65	Permit Predominant Air Contaminant	90.6	90.7
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0.1	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	90.7	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0.8	0.8	0
PM <sub>10</sub>	0.8	0.8	0
SO <sub>2</sub>	0.4	0.4	0
VOC	90.6	90.7	0.1
CO	6.2	6.5	0.3
NO <sub>x</sub>	8.6	8.9	0.3
HAP	5.1	5.1	0
Ozone	22.52	25.22	2.7
HCl	0.04	0.04	0