

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2042-AR-4 AFIN: 04-00715

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Cryovac, Inc.  
4 Bekaert Drive  
Rogers, Arkansas 72756

3. PERMIT WRITER:

Alexander Sudibjo

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Plastics Bag and Pouch Manufacturing  
NAICS Code: 326111

5. SUBMITTALS:

12/4/2012

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 three (3) new surface treating units as SN-13 and adds existing gas-fired emergency generator (SN-14) and existing diesel-powered fire water pump (SN-15) as permitted sources under NESHAP ZZZZ. The facility's permitted annual emissions are increasing by 0.2 tpy, 0.2 tpy, 0.2 tpy, 0.9 tpy, 1.4 tpy, 1.93 tpy, and 0.02 tpy for PM/PM<sub>10</sub>, SO<sub>2</sub>, VOC, CO, NO<sub>x</sub>, Ozone, and Acrolein respectively.

7. COMPLIANCE STATUS:

As of December 4, 2012, there are no compliance 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  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list, or*
- *CO<sub>2</sub>e potential to emit  $\geq 100,000$  tpy and  $\geq 100$  tpy/ $\geq 250$  tpy of combined GHGs?*

If yes, explain why this permit modification is not PSD.

9. GHG MAJOR SOURCE (TITLE V):

Indicate one:

- Facility is classified as a major source for GHG and the permit includes this designation
- Facility does not have the physical potential to be a major GHG source
- Facility has restrictions on GHG or throughput rates that limit facility to a minor GHG source. Describe these restrictions: \_\_\_\_\_

10. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-14 and SN-15	HAPs	NESHAP ZZZZ

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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:

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?
Acrolein	0.229	0.0252	0.04	N

Modeling was not performed due to the source being an emergency generator.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
5	Material balance	N/A	RTO	98% destruction	
8	Material balance	10% uncaptured			
11 and 12	Manufacturer data	0.73 lb ozone/kW	None	N/A	
13	Manufacturer Data	0.073 lb ozone/kW	-	-	3 units 2 kW/hr per unit
14	AP-42 3.2	<u>Units in lb/MMBtu</u> PM/PM <sub>10</sub> : 0.0195 SO <sub>2</sub> : 0.000588 VOC: 0.0296 CO: 3.72 NO <sub>x</sub> : 2.21 Acrolein: 0.0263	-	-	945 scf/hr maximum capacity 300 hr/yr
15	AP-42 3.3	<u>Units in lb/MMBtu</u> PM/PM <sub>10</sub> : 0.31 SO <sub>2</sub> : 0.29 VOC: 0.36 CO: 0.95 NO <sub>x</sub> : 4.41 Acrolein: 9.25e-5	-	-	10.7 gal/hr 0.138 MMBtu/gal 300 hr/yr

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

15. MONITORING OR CEMS

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

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
14 and 15	Hours of Operation	Non-resettable Hour Meter	Continuous	N

16. 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
14 and 15	Hours of operation	300 hours per year for emergency operation 100 hours per year for maintenance checks and readiness testing 50 hours per year for non-emergency situations	As necessary	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
SN-01 through SN-09 and SN-11 through SN-14	5%	Department Guidance	Inspector to verify on inspection.
SN-10 and SN-15	20%	Department Guidance	Inspector to verify on inspection.

18. DELETED CONDITIONS:

Former SC	Justification for removal
#20	Provisions of NESHAP ZZZZ are being added into this permit modification

19. 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
Diesel Fuel Storage Tank for Fire Water Pump	A-2	-	-	0.01	-	-	0.01	0.01

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2042-AR-3

21. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

\_\_\_\_\_  
Karen Cerney, P.E.



## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION