

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2042-AR-5 AFIN: 04-00715

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Cryovac, LLC
4 Bekaert Drive
Rogers, Arkansas 72756

3. PERMIT WRITER:

Alexander Sudibjo

4. NAICS DESCRIPTION AND CODE:

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

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
12/19/2019	Deminimis	New film cleaning machine (SN-16)

6. REVIEWER'S NOTES:

This deminimis modification adds a new film cleaning machine (SN-16). This equipment will be used to clean "start-up film" from the printing presses so that the material can be reused to minimize waste generation. The facility's permitted annual emissions are increasing by 7.0 tpy VOC and 2.00 tpy total HAPs.

7. COMPLIANCE STATUS:

As of December 19, 2019, there are no compliance issues with the facility.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant?

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 for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

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

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N/A

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit?

If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
N/A		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

b) 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 has deemed the 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?
Acrolein	0.229	0.0252	0.04	N

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

c) H₂S Modeling:

The facility does not have any H₂S emissions.

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 ₁₀ : 0.0195 SO ₂ : 0.000588 VOC: 0.0296	-	-	945 scf/hr maximum capacity 300 hr/yr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		CO: 3.72 NO _x : 2.21 Acrolein: 0.0263			
15	AP-42 3.3	<u>Units in lb/MMBtu</u> PM/PM ₁₀ : 0.31 SO ₂ : 0.29 VOC: 0.36 CO: 0.95 NO _x : 4.41 Acrolein: 9.25e-5	-	-	10.7 gal/hr 0.138 MMBtu/gal 300 hr/yr
16	Mass Balance	VOC: 3.5 lb/gal HAP: 1 lb/gal	None	N/A	1 gal/hr 4000 gal/yr

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

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)
Facility	VOC content by material balance for inks/solvents	697 tons/yr	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Total HAP content of inks/solvents	4%	Monthly	N
	Single HAP content of inks/solvents	1%	Monthly	N
	TLV limit for inks/solvents with > 0.1% HAP content	29 mg/m ³	Monthly	N
	Total HAP emissions	7.10 tons/yr	Monthly	N
Printing Press #4	VOC content by material balance for inks/solvents	232.4 tons/yr	Monthly	N
	HAP content of inks/solvents	Cannot use any HAP containing material	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
16	VOC content of ink washing fluid	3.5 lb/gal	Monthly	N
	HAP content of ink washing fluid	1.0 lb/gal	Monthly	N
	Annual ink washing fluid usage	4,000 gal/yr	Monthly	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
	N/A

19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	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:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
2042-AR-4

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

