

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0407-AOP-R0 AFIN: 04-00100

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Glad Manufacturing Company
1700 N. 13th Street
Rogers, Arkansas 72756

3. PERMIT WRITER:

Shawn Hutchings

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Unlaminated Plastics Film and Sheet (except Packaging)
Manufacturing
NAICS Code: 326113

5. SUBMITTALS:

3/9/2009

6. REVIEWER'S NOTES:

This permit is the first Title V permit for the facility. In this permit Glad is adding a new wrap extrusion line, SN-13 and a 18th extrusion tower at SN-06. The 18th tower was permitted in previous modifications to Glad's minor source permit but never constructed. Operations which were considered insignificant in previous permits are being added as sources. These sources include the Press-N-Seal Lines (SN-19), the Extrusion Tower Shroud Exhausts (SN-18), and the Cooling Towers, SN-20. The emissions from the Railcar Polyethylene Pellet Transport, SN-01, 02, 03, and 16 were based on maximum capacity and therefore the 300,000 ton throughput limit was removed. The Zipper/Glad-Lock lines were modified to allow production of freezer bags on all lines. The Ink Jet Printer annual throughput was increased.

7. COMPLIANCE STATUS:

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

The press-n-seal lines which were considered insignificant in previous permit are now being added as sources. Those 2 lines account for 50 tpy of VOC at continuous operation. Glad previously had 3 Press-n-Seal lines which would be 75 tpy VOC. If those emission rates had been submitted when the Press-N-Seal lines were proposed as insignificant activities they would not qualify and Glad would have been required to obtain a Title V permit prior to their installation. The enforcement section has been notified of this fact.

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)
None		

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.

Pollutant	Emission Rate (lb/hr)	NAAQS Standard ($\mu\text{g}/\text{m}^3$)	Averaging Time	Highest Concentration ($\mu\text{g}/\text{m}^3$)	% of NAAQS
PM ₁₀	23.9	50	Annual	7.6	15.2
		150	24-Hour	75.9	50.5

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
01, 02, 03, 04 05 09 16 17	Grain loading for PM	0.02/0.03 gr/dscf	Filters		
06 18	Testing	varied	none		Glad conducted testing in 2008 of 1 vent at each of these sources. Emission were calculated for all vents with 30% safety factor.
07 08 10 11 13	Testing	Varied	none		Testing was conducted at Glad's Amhurst, VA plant. A lb/ton factor was derived for each pollutant.
15	VOC/HAP usage	7 lb/gal	None		
19	Testing	0.05lb/lb	None		Adhesive manufacturer tested for amount of adhesive which volatilizes during production.
20	AP-42 drift rate calculation	0.02% Drift 737 ppm solids	None		

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
No testing was required				

14. 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)
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)
15	VOC HAP Content, and HAP TLV	Ink VOC: 6.0 lbs/gal Makeup VOC: 7.0 lbs/gal 20.0 tons of VOC from the ink jet printers HAP content: 0.96 lbs/gal HAP TLV: 43.6 mg/m ³ DEHP content: 0.32 lbs/gallon.	Monthly	Y
19	Adhesive Throughput	1,997,280 pounds	Monthly	Y

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 03, 16	5%	Department Guidance	Weekly Readings
04 05 06 07 08 09 10 11 13 17 18	5%	Department Guidance	Plantwide 5. Inside sources with no specific roof vent

SN	Opacity	Justification for limit	Compliance Mechanism
			stacks

17. DELETED CONDITIONS:

Former SC	Justification for removal
6 and 8	Throughput limit no longer needed. Basis for emission rate changed.
7	The facility has no natural gas fired sources. A combust pipeline quality natural gas only requirement is not necessary.

18. GROUP A INSIGNIFICANT ACTIVITIES

Source Name	Group A Category	Emissions (tpy)							
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs		
							Single	Total	
Polyethylene Film Conversions to Bags using Blanket Machines	A-13	0.18							
Resin Transfer Blowers	A-13	1.61							
Scrap Film Reclaim Operations	A-13	0.24							
Total	A-13	2.03							
Two Natural Gas Fired Standby Generators (15 kW and 40 kW)	A-1	0.24	0.02	0.18	2.7	3.22			

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

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20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

Phillip Murphy, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-01-10

Glad Manufacturing Company
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\$/ton factor	22.07	Annual Chargeable Emissions (tpy)	241.8
Permit Type	Initial Permit	Permit Fee \$	3008.526

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input checked="" type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	2328
Total Permit Fee Chargeable Emissions (tpy)	91.6
Initial Title V Permit Fee Chargeable Emissions (tpy)	241.8

HAPs not included in VOC or PM: Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants: All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensable PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM	<input checked="" type="checkbox"/>	53.8	75.3	21.5	21.5	75.3
PM ₁₀	<input type="checkbox"/>	53.8	75.3	21.5		
SO ₂	<input type="checkbox"/>	0	0	0		
VOC	<input checked="" type="checkbox"/>	96.4	166.5	70.1	70.1	166.5
CO	<input type="checkbox"/>	0	0	0		
NO _x	<input type="checkbox"/>	0	0	0		