

Response to Comments

Glad Manufacturing AFIN: 04-00100 Permit 407-AOP-R0

On or about February 11, 2010, 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 person submitted written comments, data views, or arguments on the draft permitting decision. The Department's response to these issues and comments follows.

Comment 1: This comment requested changes to the emission summary and the emission limits on pages 7 and 13 of the draft permit. Specifically requested was correcting the total VOC emission rate for the facility and deleting the VOC and HAP rates for SN-05 which were in error (SN-05 is a particulate only source), and correcting the overall facility HAP limits to 1.2 lb/hr and 5.2 tons per year.

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

Comment 2: Glad requested opacity limits for SN-04, 05, 06, 07, 08, 09, 10, 11, 13, 17, and 18 be changed to 20% as was in the previous minor source permit from the 5% in the draft Title V permit. Glad also states that it was their understanding that Title V operating permits are intended to incorporate all existing air permit requirements and not establish new, more stringent requirements.

Response: When a facility applies for an initial Title V permit all sources of emissions at the facility and their limits and requirements are re-evaluated. When the Title V permit is renewed they will all be re-evaluated again. The sources listed should under proper operation have no visible emissions and were given 5% opacity limits.

Glad was asked to provide information if any of the sources would be unable to meet a 5% opacity limit. Glad provided a letter explaining that SN-08 could have visible emissions greater than 5% in normal operation due to condensable particulate in the exhaust stream. The opacity limit for this source was changed back to 20% all others remain at 5% as in the draft permit.

Comment 3: In the draft permit the source, SN-15, was renamed from "Non-point Source Emissions" to "Ink Jet Printers". Glad requests that the name be changed back to "Non-point source emissions" because the new name does not encompass all miscellaneous solvent and ink usage associated with various manufacturing processes.

Response: The Department tries to be careful in what it names "non-point source" or "fugitive" in a permit. Typically only sources which cannot pass through a stack (roadways, storage piles, equipment leaks, etc) are given fugitive or non-point source designations. Since the ink usage and printers of this source are all used indoors they exit the building through ventilation which makes them a point source. The source was

renamed Ink Jet Printers and Miscellaneous Solvent and Ink Usage to satisfy Glad's concerns that the source name didn't represent all activities its emissions represented.

Comment 4: Requested updating the insignificant activities list to include all activities requested in the Title V application.

Response: In the Title V application Glad provided no calculations of emissions to demonstrate that the requested activities qualified as insignificant. The Department requested calculations from Glad and Glad provided calculations for some of the requested activities. The activities which qualified based on the additional information Glad provided were added to the draft permit. Once this comment was received, the Department again requested calculations for the specific activities Glad wished to be included. Glad submitted calculations for 5 activities: The Die Cleaning Oven, Glad-Lock Curing Oven, Diesel Fuel Storage Tanks, Miscellaneous Adhesive Usage, and Chiller Refrigerant Usage. All these activities were added to the insignificant activities list except Chiller Refrigerant Usage. The Refrigerant Usage would either fall under category B.2 of insignificant activities and is not required to be listed or the usage is subject to Title VI of the Clean Air Act and would not qualify as A-13 due to those requirements.

Additional Comment: Glad submitted a letter after the comment period closed requesting the removal of a number of sources from the facility. Since the removal of the sources qualifies as an administrative amendment and does not require public notice the changes were made to the final permit. The changes are summarized as follows:

- 1: 24 rotary bag machines are being removed from service. These sources comprise SN-07. The 7 remaining rotary bag machines will remain in service.
- 2: The Blanket Machines an insignificant activity are being moved to a new location. This requires no changes in the permit.
- 3: 6 of the existing Zipper lines at the plant are being removed. 2 will remain and comprise sources SN-10 and 11.
- 4: The new wrap line, SN-13 is no longer going to be installed and is removed from the permit.



ARKANSAS
Department of Environmental Quality

September 16, 2010

Mike Watkins
Glad Manufacturing Company
1700 N. 13th Street
Rogers, AR 72756

Dear Mr. Watkins:

The enclosed Permit No. 0407-AOP-R0 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 3/9/2009.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0407-AOP-R0 for the construction, operation and maintenance of an air pollution control system for Glad Manufacturing Company to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,

A handwritten signature in black ink that reads "Mike Bates".

Mike Bates
Chief, Air Division

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. : 0407-AOP-R0

IS ISSUED TO:

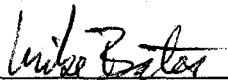
Glad Manufacturing Company
1700 N. 13th Street
Rogers, AR 72756
Benton County
AFIN: 04-00100

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

September 16, 2010 AND September 15, 2015

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:


Mike Bates
Chief, Air Division

September 16, 2010

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
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Glad Manufacturing Company

AFIN: 04-00100

PERMIT NUMBER: 0407-AOP-R0

FACILITY ADDRESS: 1700 N. 13th Street
Rogers, AR 72756

MAILING ADDRESS: 1700 N. 13th Street
Rogers, AR 72756

COUNTY: Benton County

CONTACT NAME: Mike Watkins

CONTACT POSITION:

TELEPHONE NUMBER: 479-246-6331

REVIEWING ENGINEER: Shawn Hutchings

UTM North South (Y): Zone 15: 4023493.99 m

UTM East West (X): Zone 15: 398181.11 m

SECTION II: INTRODUCTION

Glad Manufacturing Company owns and operates a facility in Rogers, Arkansas. This facility produces polyethylene products which are marketed under the "Glad" trade name. The products manufactured include plastic food wrap and various storage bags.

Summary of Permit Activity

This permit is the first Title V permit for the facility. In this permit Glad is adding 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, (50 tpy VOC); the Extrusion Tower Shroud Exhausts, SN-18, (42 tpy VOC and 18.6 tpy PM); and the Cooling Towers, SN-20 (3.7 tpy PM). 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.

After the comment period Glad submitted a request to remove equipment which comprised a portion of sources SN-07, 10, and 11, and to move the Bag Conversion Machine an insignificant activity. Since these changes qualify as administrative amendments the changes were made to the final permit.

Process Description

Polyethylene resin pellets are the raw material for the manufacturing of plastic bags and wrap at the Rogers facility. The polyethylene resin is shipped to the facility in railcar, bulk hopper trucks, and standard trucks in cardboard gaylords. The resin is unloaded using a vacuum blower to remove it from the container and a pressure blower to fill any of thirty-one silos on site. The various types of resin are blended and pneumatically transferred to extruders where the polyethylene resin pellets are transformed into various types of polyethylene film.

In the blown film extrusion process, chilled air is supplied and exhausted in a single-pass manner through the extruded plastic "bubble". This flow of air maintains the shape and cools the plastic "bubble" as it is being extruded from the die; the internal cooling exhaust is then exhausted to the outside atmosphere. This system is known as the Internal Bubble Cooling System or IBC for short. The area where the film bubble is "blown" is separated from the manufacturing area by a multi-level corrugated metal siding "shroud". Air inside this shroud is either cooled and recirculated closed-loop or passed through the shroud once in a once-thru open-loop system. The facility produces both scented and unscented polyethylene film. Scented film is produced by adding a small fraction of specialty resin containing fragrance oil to the film resin blend and utilized the once through shroud cooling system to avoid the build up of the scent odors in the manufacturing area. Unscented film is normally produced using a recirculated shroud air cooling system. On some of the lines, the plastic film is treated by passing it through a high voltage,

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high frequency corona treater. This process aids in film printing and film winding. Polyethylene film which is extruded and wound into mill roll form on the extrusion equipment is converted and packaged on bag machines. Extrusion screens used to produce polyethylene film are routinely removed from service and cleaned by "burning out the dies" in a batch-mode operated, natural gas fired, die cleaning oven. Combustion products from this cleaning process are exhausted to atmosphere.

Extruded polyethylene film is converted to bags on two types of conversion machines. Rotary Bag Machines (RBM's) form and then create individual bags in a process that includes sealing the side of the bags and separating them by the action of a hot knife that cuts through the polyethylene film to produce each individual bag. The heat and gases created with the action of the hot knife as it cuts through the layers of film are removed from the machine by an air exhaust system. A second type of converting process converts polyethylene film to bags using a "Blanket Manufacturing Process". This bag manufacturing process is different in that it creates a bag with hot film seal bars and then separates each bag in a mechanical process with a rotating knife versus using heat to cut the bag. Blanket Bag Machines do not exhaust directly to outside atmosphere. As a result of the mechanical action associated with creating the bag vs. heat, there is no machine specific point ventilation.

In the Gladlock Zipper Bag manufacturing process, polyethylene resin is extruded through a slot die process onto a water-chilled casting roll to form a sheet of plastic film. Vapors from the polyethylene extrusion process are exhausted to the outside atmosphere through fan driven exhaust system. A corona treatment process downstream of the extrusion process prepares the film for printing and folding. During this process the outside edges of the web are trimmed off. A blower transfer system transfers the edge-trim to a grinder for reprocessing. A bag-making machine converts the film into individual bags by cutting and sealing the film with a heated knife. The plastic fumes that are generated from this bag making process are exhausted to the outside atmosphere.

Curing ovens are used to heat finished Glad-Lock product for the purpose of accelerated aging. These curing ovens that operate at about 120° F are heated by natural gas fueled forced air heat units. Emissions are from a burner vent and consist of by-products of the natural gas combustion process.

A portion of the polyethylene bags produced contains printed messages that are created through the use of printers which may be located in the film extrusion area or the film conversion area.

In the slot extrusion process, molten polyethylene plastic is extruded from a slot die onto a water-chilled casting roll to form a thin plastic sheet. Gaseous polyethylene plastic by-products are emitted from the slot die which are exhausted to the outside atmosphere by an overhead exhaust fan. In the Glad Wrap converting process, large mill rolls are re-wound in smaller consumer size rolls. During this process the outside edges of the web are trimmed off. A blower system transfers the edge-trim to a grinder for reprocessing utilizing a venture type pneumatic collection system. Product collected in this system is returned to the process and extruded again.

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Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 18, 2009
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective January 25, 2009

Emission Summary

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

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	18.0	75.3
		PM ₁₀	18.0	75.3
		VOC	37.9	166.5
		HAPs*	0.79	3.23
01	#1 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM	1.2	4.9
		PM ₁₀	1.2	4.9
02	#2 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM	1.2	4.9
		PM ₁₀	1.2	4.9
03	#3 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM	1.2	4.9
		PM ₁₀	1.2	4.9
16	#4 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM	1.2	4.9
		PM ₁₀	1.2	4.9
04	Glad-Lock, Wrap, Reclaim Transport of Polyethylene Pellets Filters	PM	1.8	7.6
		PM ₁₀	1.8	7.6

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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
05	Resin Storage and Rail Car Loading Filters	PM	1.2	5.1
		PM ₁₀	1.2	5.1
06	Extrusion Tower Exhaust	PM	0.9	3.8
		PM ₁₀	0.9	3.8
		VOC	5.2	22.6
		HAPs	0.04	0.18
07	Conversion Bag Machine Exhaust	PM	0.3	1.3
		PM ₁₀	0.3	1.3
		VOC	0.5	2.0
		HAPs	0.02	0.05
08	Wrap Extrusion Exhaust Filter	PM	1.1	4.7
		PM ₁₀	1.1	4.7
		VOC	1.5	6.6
		HAPs	0.01	0.03
09	Wrap Conversion Exhaust	PM	0.3	1.1
		PM ₁₀	0.3	1.1
10	Glad-Lock Extrusion Exhaust	PM	0.5	1.8
		PM ₁₀	0.5	1.8
		VOC	1.4	6.0
		HAPs	0.03	0.12
11	Glad-Lock Conversion Exhaust	PM	1.5	6.2
		PM ₁₀	1.5	6.2
		VOC	2.5	10.8
		HAPs	0.15	0.63
15	Ink Jet Printers and miscellaneous ink and solvent usage	VOC	5.6	25.7
		HAPs	0.5	2.2
17	Reclaim Operations	PM	0.4	1.8
		PM ₁₀	0.4	1.8
18	Extrusion Tower Shroud Cooling Exhaust	PM	4.3	18.6
		PM ₁₀	4.3	18.6
		VOC	9.8	42.8
		HAPs	0.04	0.02
19	Press-N-Seal Manufacturing Lines (2)	VOC	11.4	50.0
20	Cooling Towers	PM	0.9	3.7
		PM ₁₀	0.9	3.7

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

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SECTION III: PERMIT HISTORY

This facility was first registered with the Department on November 1, 1972 as a facility below the threshold for requiring an air permit.

Permit No. 0407-A was issued to Union Carbide Corporation on May 27, 1977. This was the initial permit for this facility.

Permit No. 0407-AR-1 was issued to Union Carbide Corporation on November 11, 1978. This permit modification was issued to allow a production increase.

Permit No. 0407-AR-2 was issued to Union Carbide Corporation on July 22, 1986. This modification was issued to reflect the sale of the facility to First Brand Corporation.

Permit No. 0407-AR-3 was issued to First Brands Corporation on September 22, 1987. This permit modification was issued to allow a facility expansion for the addition of two "Glad Lock" bag lines and two addition bubble cooling extrusion lines.

Permit No. 0407-AR-4 was issued to First Brands Corporation on October 17, 1990. Emission limits were: PM/PM₁₀ – 25.23 tpy and VOC – 40.08 tpy,

Permit No. 0407-AR-5 was issued to First Brands Corporation on December 20, 1995. This permit modification was issued to allow the installation of a straw production line. Emission limits were: PM/PM₁₀ – 26.70 tpy, SO_x – 0.17 tpy, VOC – 56.57 tpy, CO – 0.89 tpy, NO_x – 0.21 tpy, Ozone – 0.30 tpy

Permit No. 0407-AR-6 was issued to First Brands Corporation on December 10, 1997. This permit modification was issued to allow the addition of Glad Lock lines 5 and 6 (SN10 and SN11) and to allow the polyethylene throughput to be increased to 300,000 tons per year. Emission limits were: PM/PM₁₀ – 47.8 tpy, SO₂ – 1.0 tpy, VOC – 56.9 tpy, CO – 1.1 tpy, NO_x – 1.0 tpy, Ozone – 1.0 tpy, MEK – 2.3 tpy, Methanol – 0.3 tpy, and other HAPs – 0.2 tpy.

Permit No. 0407-AR-6 was transferred from First Brands Corporation to Glad Manufacturing Corporation on March 3, 2000.

Permit No. 0407-AR-7 was issued to Glad Manufacturing Company July 20, 2005. This permit modification was issued to allow the facility to increase the polyethylene extrusion blown film towers, to replace the current water based suffocation hazard warning printers with up to fifteen ink jet printers, and to revise the process description. Emission limits were: PM/PM₁₀ – 42.3 tpy, SO₂ – 0.5 tpy, VOC – 74.4 tpy, CO – 0.6 tpy, NO_x – 0.8 tpy, MEK – 5.0 tpy, Methanol – 0.3 tpy, and other HAPs – 0.2 tpy.

Permit 407-AR-8 was issued to Glad Manufacturing Company on January 6, 2006. This permit modification is issued to revise the emission limits for the facility based on extensive stack testing completed at Glad's Amherst Virginia plant which utilizes similar processes.

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No changes in equipment or operations are made with this permit modification.

Permit 407-AR-9 was issued to Glad on October 11, 2006. This permit expanded printing operations on plastic bags through the addition of ink jet printers. Glad was previously specifically permitted for 15 printers which limited operational flexibility since some products contain printed suffocation warning messages and others do not. The purpose of this permit was to allow for increased printed film products. Hourly emissions from printing are now based upon a maximum of 64 printers operating at any one time, annual emissions are now based upon total ink and solvent usage. Permitted VOC emissions will increase 8 tons per year. HAP emissions are no longer speciated and MEK is now permitted as a VOC and not a HAP since it was delisted as a HAP. HAP emissions are now permitted at 2.2 tons per year.

Permit 407-AR-10 was issued to Glad on November 15, 2007. Glad added a fourth railcar unloading station. Permitted emissions increased 1.2 lb/hr and 4.9 tpy of particulate matter.

Permit 401-AR-11 was issued to Glad on March 3, 2008. Glad added an additional polyethylene reclaim operation, SN-17. The source added 1.8 tpy of particulate emissions. Glad also added a melt pump system to Extrusion Tower #17. This melt pump has the potential to increase the throughput to that extrusion tower. Permitted VOC emissions for SN-06 increased 1.4 tpy.

Permit 401-AR-12 was issued to Glad on December 15, 2008. Glad increased the allowed VOC content at SN-15. This change accounted for a permitted increase of 2 tons per year of VOC from the source.

SECTION IV: SPECIFIC CONDITIONS

Resin Pellet Handling

SN-01, 02, 03, and 16

#1, #2, #3, and #4 Vacuum Transport of Polyethylene Pellets from Railcar Filters

Source Description

Polyethylene resin pellets are the raw material for the manufacturing of plastic bags and wrap at the Rogers facility. The polyethylene resin is transported to the facility in railcars, bulk hopper trucks, and standard trucks in cardboard gaylords. The resin is unloaded using vacuum blowers to transfer the resin from the containers and pressure blowers to fill any of thirty two resin storage silos. The various types of resin are blended and pneumatically conveyed to extruders where the polyethylene pellets are extruded through blown film and slot cast dies to form various types of polyethylene film.

Polyethylene resin is transferred from the railcars in one of four vacuum transport systems, each of which is equipped with two blowers and an intermediate hopper. The first blower pneumatically vacuums the pellets to the intermediate hopper that is equipped with a filtered exhaust system. The second blower pneumatically blows the pellets from the intermediate hopper to any of the resin storage silos.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	#1 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM ₁₀	1.2	4.9
02	#2 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM ₁₀	1.2	4.9
03	#3 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM ₁₀	1.2	4.9
16	#4 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM ₁₀	1.2	4.9

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2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 18, §18.801, 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
01	#1 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM	1.2	4.9
02	#2 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM	1.2	4.9
03	#3 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM	1.2	4.9
16	#4 Vacuum Transport of Polyethylene Pellets from Railcar Filters	PM	1.2	4.9

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method

SN	Limit	Regulatory Citation
01, 02, 03, 16	5%	§18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

4. The permittee shall conduct weekly observations of the opacity from sources SN-01, 02, 03, and 16 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. These records shall be kept in accordance with General Provision 7. [§18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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Reclaim Operations

SN-04, 05, and SN-17

Glad-Lock, Wrap, Reclaim Transport of Polyethylene Pellets Filters, Resin Storage and Rail Car Loading Filters and Reclaim Operations

Source Description

The Glad Rogers plant reclaims polyethylene from both its film and bag production. Extra film, bag material and other scrap is reground and fed into the reclaim extruders. The resulting molten plastic is run through pelletizers, water-cooled and dried with ambient air. The air driers are exhausted to the atmosphere. The reclaim pellets are pneumatically conveyed through a series of intermediate receivers equipped with fabric filters or cyclones then pneumatically conveyed to silos.

Specific Conditions

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
04	Glad-Lock, Wrap, Reclaim Transport of Polyethylene Pellets Filters	PM ₁₀	1.8	7.6
05	Resin Storage and Rail Car Loading Filters	PM ₁₀	1.2	5.1
17	Reclaim Operations	PM ₁₀	0.4	1.8

6. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 18, §18.801 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
04	Glad-Lock, Wrap, Reclaim Transport of Polyethylene Pellets Filters	PM	1.8	7.6
05	Resin Storage and Rail Car Loading Filters	PM	1.2	5.1
17	Reclaim Operations	PM	0.4	1.8

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7. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
04, 05, and 17	5%	§18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

Extrusion Towers

SN-06 and 18

Extrusion Tower Exhaust and Extrusion Tower Shroud Cooling Exhaust

Source Description

The Rogers plant operates eighteen extrusion towers, SN-06, that are used to produce polyethylene film for the production of trash bags. Polyethylene resin is melted and fed to a rotating die where the film is blown into a bubble. In the blown film extrusion process, chilled air is supplied and exhausted in a single pass manner through the extruded bubble. This flow of air maintains the shape and cools the plastic bubble as it is being extruded from the die; the internal bubble cooling system, SN-18, is then exhausted to the outside.

Extrusion towers #17 and #19 are equipped with a resin melt pump between the extruder and the die. This allows the tower to process up to 3000lb/hr of resin compared to 2300 lb/hr of resin.

Specific Conditions

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
06	Extrusion Tower Exhaust	PM ₁₀	0.9	3.8
		VOC	5.2	22.6
18	Extrusion Tower Shroud Cooling Exhaust	PM ₁₀	4.3	18.6
		VOC	9.8	42.8

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 18, §18.801, 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
06	Extrusion Tower Exhaust	PM	0.9	3.8
		HAPs	0.04	0.18
18	Extrusion Tower Shroud Cooling Exhaust	PM	4.3	18.6
		HAPs	0.04	0.02

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10. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
06 and 18	5%	§18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

SN-07

Bag Conversion Machines

Source Description

Polyethylene film is converted to bags on two types of conversion machines. Rotary Bag Machines form individual bags in a process that includes sealing the side of the bag and separating it from the other bags with a hot knife.

The other bag converting process creates bags from polyethylene film using a "Blanket Manufacturing Process". These bags are listed as insignificant activities.

Specific Conditions

11. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
07	Conversion Bag Machine Exhaust	PM ₁₀	0.3	1.3
		VOC	0.5	2.0

12. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 18, §18.801, 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
07	Conversion Bag Machine Exhaust	PM	0.3	1.3
		HAPs	0.02	0.05

13. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
07	5%	§18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

Glad Wrap Production

SN-08, and 09

Wrap Extrusion Exhaust Filter and Wrap Conversion Exhaust

Source Description

Glad operates 2 food wrap production lines. In the Glad wrap manufacturing process, polyethylene resin is extruded through a slot die process onto a water chilled casting roll to form a sheet of plastic film. In the Glad wrap converting process, large mill rolls are cut mechanically and re-wound into small consumer size rolls.

Specific Conditions

14. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
08	Wrap Extrusion Exhaust Filter	PM ₁₀	1.1	4.7
		VOC	1.5	6.6
09	Wrap Conversion Exhaust	PM ₁₀	0.3	1.1

15. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 18, §18.801, 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
08	Wrap Extrusion Exhaust Filter	PM	1.1	4.7
		HAPs	0.01	0.03
09	Wrap Conversion Exhaust	PM	0.3	1.1

16. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
09	5%	§18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-

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		311
08	20%	§19.503 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

Glad-Lock Zipper Bag Production

SN-10 and 11

Glad-Lock Extrusion Exhaust and Glad-Lock Conversion Exhaust

Source Description

The Glad Rogers plant operates six Zipper® bag manufacturing lines that producing locking food storage bags. Polyethylene resins is extruded, SN-10, through a slot die process onto a water chilled casting roll to form a sheet of plastic film. Bag making machines converts the film into individual bags, SN-11, by cutting and sealing the film with a heated wire.

Specific Conditions

17. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
10	Glad-Lock Extrusion Exhaust	PM ₁₀	0.5	1.8
		VOC	1.4	6.0
11	Glad-Lock Conversion Exhaust	PM ₁₀	1.5	6.2
		VOC	2.5	10.8

18. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 18, §18.801, 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
10	Glad-Lock Extrusion Exhaust	PM	0.5	1.8
		HAPs	0.03	0.12
11	Glad-Lock Conversion Exhaust	PM	1.5	6.2
		HAPs	0.15	0.63

19. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

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SN	Limit	Regulatory Citation
10 and 11	5%	§18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

SN-15
Ink Jet Printers and Miscellaneous Ink and Solvent Usage

Source Description

Glad operates up to 64 ink jet printers to print suffocation warnings on film. These printers are located either on the bag conversion lines or the blown film extrusion towers.

Specific Conditions

20. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 22. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
15	Ink Jet Printers and Miscellaneous Ink and Solvent usage	VOC	5.6	25.7

21. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 24. [Regulation 18, §18.801, 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
15	Ink Jet Printers and Miscellaneous Ink and Solvent usage	HAP	0.5	2.2

22. The permittee shall not use an ink with a VOC content greater than 6.0 lbs/gal or a makeup with a VOC content greater than 7.0 lbs/gal in the ink jet printers of SN-15. The permittee shall not emit more than 20.0 tons of VOC from the ink jet printers of SN-15 in any consecutive 12 month period. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 70.6]

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23. The permittee shall maintain monthly records which show compliance with the VOC limits on the SN-15 in Specific Condition 22. These records shall include the name of each ink or make up used, the VOC content of each ink or make up, the monthly total of VOC emissions from ink and make up use, and the consecutive 12 month total of VOC emissions from ink and make-up use. 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. These records shall be kept in accordance with General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]
24. The permittee shall not use an ink or a makeup with a HAP content greater than 0.96 lbs/gal in the ink jet printers of SN-15. The permittee may not use an ink or makeup with a HAP which has a TLV lower than 43.6 mg/m^3 . The 43.6 mg/m^3 limit on the HAPs does not apply to DEHP. The permittee may use an ink with a DEHP content up to 0.32 lbs/gallon. HAP content of inks and make-up shall be verified by MSDS or manufacturer data. TLV of HAPs shall be the most recent value published by the American Conference of Governmental Industrial Hygienists (ACGIH). [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
25. The permittee shall maintain monthly records which show compliance with the HAP limits on the SN-15 in Specific Condition 24. These records shall include the name of each ink or make up used, the content of each HAP (in lb/gal) in each ink or make up, the total HAP content of each ink and make up used, the monthly total of each HAP's emissions from ink and make up use, and the consecutive 12 month total of each HAP's emissions from ink and make-up use. 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. These records shall be kept in accordance with General Provision 7. [Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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Press-N-Seal Lines

SN-19

Source Description

Glad operates two Press-N-Seal® lines at the Rogers Plant. These lines apply a proprietary hot melt adhesive to polyethylene film to produce a self sealing film consumer product. The Press-N-Seal lines were previously considered insignificant.

Specific Conditions

26. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
19	Press-N-Seal Manufacturing Lines (2)	VOC	11.4	50.0

27. The permittee shall not process more than 1,997,280 pounds of adhesive through the Press-n-Seal lines in any consecutive 12-month period. [Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 70.6]
28. The permittee shall maintain records of the adhesive processed through the Press-N-Seal lines on a monthly basis. These records shall be updated by the 15th day of the month following the month to which the records pertain, include both the monthly total of adhesive used, the consecutive 12-month rolling total of adhesive used, kept on site and made available to Department personnel upon request. These records shall be kept in accordance with General Provision 7. [Regulation 19, §19.705 and 40 CFR Part 52, Subpart E]

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SN-20
Cooling Towers

Source Description

The Glad Rogers plant includes several cooling towers to manage plant process water.

Specific Conditions

29. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

SN	Description	Pollutant	lb/hr	tpy
20	Cooling Towers	PM ₁₀	0.9	3.7

30. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [Regulation 18, §18.801, 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
20	Cooling Towers	PM	0.9	3.7

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Glad Manufacturing Company will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly 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) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. 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 shall submit the compliance test results to the Department within thirty (30) days after completing the 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]
4. The permittee must provide:
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment.

[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]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Title VI Provisions

7. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
 - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
8. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC like appliance” as defined at §82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
9. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
10. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart

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B does not include the air tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC 22 refrigerant.

11. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.

SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated March 9, 2009.

Description	Category
Polyethylene Film Conversions to Bags using Blanket Machines	A-13
Resin Transfer Blowers	A-13
Scrap Film Reclaim Operations	A-13
Two Natural Gas Fired Standby Generators (15 kW and 40 kW)	A-1
Die Cleaning Ovens	A-1
Glad Lock Curing Oven	A-1
Diesel Fuel Storage Tanks	A-3
Miscellaneous Adhesive Usage	A-13

SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which 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 which 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. [40 CFR 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26)]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

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6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below:

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location;
 - ii. The process unit or emission source deviating from the permit limit;
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
 - iv. The date and time the deviation started;
 - v. The duration of the deviation;
 - vi. The average emissions during the deviation;
 - vii. The probable cause of such deviations;
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
 - ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

- 9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
- 11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
- 12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
- 13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]

14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

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- d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]
- a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
- c. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - d. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - e. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - f. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
- a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

Glad Manufacturing Company

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[Regulation 18, §18.314(A), Regulation 19, §19.416(A), Regulation 26, §26.1013(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
- a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;
 - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
 - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
 - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), Regulation 26, §26.1013(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), Regulation 26, §26.1013(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]