

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0407-AOP-R1 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:

2/7/2012

6. REVIEWER'S NOTES:

In this modification Glad is installing new ink jet printers, SN-15A, on 36 existing bag conversion machines and installing a new fragrance application system, SN-21, on 29 existing blanket bag conversion machines. Also a condition was added to require Glad to submit an application to include the RICE MACT 40 CFR Subpart ZZZZ requirements for two emergency generators currently permitted as insignificant.

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.

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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)
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.

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	Grain loading for PM	0.02/0.03 gr/dscf	Filters		

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
05 09 16 17					
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 15A	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		
21	VOC usage and Evaporation rate from testing	Listed as confidential	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 15A	VOC HAP Content, and HAP TLV	Ink VOC SN-15: 6.0 Ink VOC SN-15A: 7.72 lbs/gal Makeup VOC: 7.0 lbs/gal 20.0 tons of VOC from the ink jet printers SN-15 5 tpy of VOC from SN- 15A 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 stacks

17. DELETED CONDITIONS:

Former SC	Justification for removal

Former SC	Justification for removal
none	

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.

Permit #
0407-AOP-R0

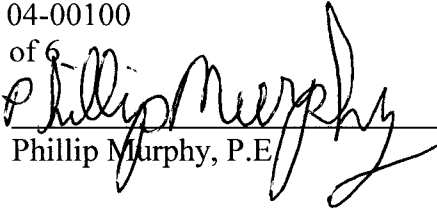
20. CONCURRENCE BY:

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 Major Source

Revised 08-30-11

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\$/ton factor	22.65	Annual Chargeable Emissions (tpy)	272.5
Permit Type	Minor Mod	Permit Fee \$	500

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 type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	30.7
Initial Title V Permit Fee Chargeable Emissions (tpy)	

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"/>	75.3	75.3	0	0	75.3
PM ₁₀	<input type="checkbox"/>	75.3	75.3	0		
SO ₂	<input type="checkbox"/>	0	0	0		
VOC	<input checked="" type="checkbox"/>	166.5	197.2	30.7	30.7	197.2
CO	<input type="checkbox"/>	0	0	0		
NO _x	<input type="checkbox"/>	0	0	0		
HAPs	<input type="checkbox"/>	3.23	3.52	0.29		