STATEMENT OF BASIS

For the issuance of Air Permit # 0407-AOP-R14 AFIN: 04-00100

1. PERMITTING AUTHORITY:

Division 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:

Alexander Sudibjo

4. NAICS DESCRIPTION AND CODE:

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

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
1/13/2025	Renewal	Equipment cleanup as permitted source

6. REVIEWER'S NOTES:

This is a Title V renewal for this facility. In this renewal, the facility is requesting the following changes:

1. Change the equipment cleanup process from an insignificant activity to a permitted source (SN-30).
2. Add a new Katara equipment as an insignificant activity.
3. Change the opacity monitoring frequency for the Resin Pellet Handling process (SN-01, 02, 03, 16, 29) to a monthly basis.

4. Change the annual emission limits for the Emergency Generators (SN-22, 23, 25) to be based on 500 hours per year instead of 8760 hours per year.

The facility's permitted annual emissions are increasing by 7.2 tpy VOC. The facility's permitted annual emissions are decreasing by 19.5 tpy CO, 8.8 tpy NOx, and 0.32 tpy total HAPs.

7. COMPLIANCE STATUS:

As of January 13, 2025, there are no compliance issues with the facility. ECHO (https://echo.epa.gov/detailed-facility-report?fid=110009353537) shows no air violations identified as of May 2, 2023.

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)
22	Criteria	NSPS JJJJ
22, 23, 25	HAPs	NESHAP ZZZZ

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
SN-21*	N/A	3/27/2025	N/A	Emission limits are based on operation of 35 bag blanket machines; 34 are currently installed.

*See Specific Condition #29. An extension request was submitted as part of the R14 renewal application.

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

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

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Rule 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		

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
N/A		

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. 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 DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H_2S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H_2S Standards Y
If exempt, explain: the facility does not have H_2S emissions.

15. 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 16 29	Testing	PM/PM_{10} from railcar: 0.020 gr/scf	Filtair Fabric Filter	99% +	SN-01, 02, 03, 16: 2,600 scfm SN-29: 1,300 scfm
		PM/PM_{10} to silos: 0.030 gr/scf			
04	Testing	PM/PM_{10}: 0.020 gr/scf	Fabric Filter	99% +	flowrate: 8,768 scfm
05	Testing	PM/PM_{10}: 0.020 gr/scf	Fabric Filter	99% +	Flowrate: 6,740 scfm
06	Testing	PM/PM_{10}: 0.048 lb/hr/exhaust VOC: 0.29 lb/hr/exhaust HAP: 0.0023 lb/hr/exhaust	None	N/A	20 exhausts
07	Testing	PM/PM_{10}: 0.065 lb/ton VOC: 0.095 lb/ton HAPs: 0.002 lb/ton	None	N/A	4 machines 1,300 lb/hr per machine
08	Testing	PM/PM_{10}: 0.813/ton VOC: 1.152 lb/ton HAPs: 0.004 lb/ton	None	N/A	11,388 tpy production
15	Mass Balance	Suffocation Warnings Ink VOC content: 4.6 lb/gal Makeup VOC content: 3.0 lb/gal No HAP content	None	N/A	100% evaporative loss
		Case Coders Ink VOC content: 0.13 lb/gal No HAP content	None	N/A	
18	Testing	PM/PM_{10}: 0.42 lb/hr/exhaust VOC: 0.98 lb/hr/exhaust HAP: 0.0039 lb/hr/exhaust	None	N/A	10 exhausts
19	Testing	VOC: 0.6105 lb/hr per line	None	N/A	3 lines

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		VOC: 2.674 tpy per line			114 lb/hr per line
20	AP-42, 13.4	PM/PM_{10}: 11,220 gal/min Drift Rate: 20% Total Dissolved Solids: 737 ppm	None	N/A	-
21	Testing	<u>Fragrance Application</u> 1000 ft/min 490 bags/min 80 mg/bag 35 machines 0.4% evaporation rate	None	N/A	250 tons fragrance per year permit limit
		<u>Scrap/Reclaim</u> 12% scrap/reclaim rate of finished product 100% evaporation rate	None	N/A	
22	Manufacturer Spec	VOC: 0.84 g/hp-hr CO: 22.3 g/hp-hr NOx: 5.08 g/hp-hr	None	N/A	36 hp 294 scf/hr 500 hr/yr
	AP-42, 3.2 4SRB	SO_2: 5.88E-04 lb/MMBtu PM/PM_{10}: 0.0194 lb/MMBtu HAPs: 3.24E-02 lb/MMBtu	None	N/A	
23 25	AP-42, 3.2 4SRB	NO_x: 2.210 lb/MMBtu CO: 3.720 lb/MMBtu VOC: 2.96E-02 lb/MMBtu SO_2: 5.88E-04 lb/MMBtu PM/PM_{10}: 0.0194 lb/MMBtu HAPs: 3.24E-02 lb/MMBtu	None	N/A	SN-23: 32 hp, 0.224 MMBtu/hr SN-25: 82 hp, 0.574 MMBtu/hr 500 hr/yr
27	Testing	PM/PM_{10}: 0.11 lb/hr/exhaust VOC: 0.66 lb/hr/exhaust HAP: 0.0053 lb/hr/exhaust	None	N/A	2 exhausts
28	Testing	PM/PM_{10}: 0.02 gr/scf	Fabric Filter	99% +	4689 scfm
30	Mass Balance	VOC content: 6.48 lb/gal	None	N/A	2200 gal/yr usage

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

17. 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)
N/A				

18. 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	Ink/Makeup VOC and HAP content	Ink VOC: 4.6 lbs/gal Makeup VOC: 3.0 lbs/gal No HAP content	Monthly	Y
19	Adhesive Throughput	2,995,920 pounds per rolling 12 month period	Monthly	Y
21	Fragrance Throughput	250 tons per rolling 12 month period	Monthly	Y
22, 23, 25	Subpart ZZZZ	None	Monthly or per event	N
	Hours of Operation	500 hours per calendar year	Monthly	Y
28	Polyethylene Resin Pellets Throughput	204,546 tons per rolling 12 month period	Monthly	Y
30	Solvent Throughput	2,200 gallons per rolling 12 month period	Monthly	Y
	VOC Content	6.48 lb/gal	Monthly	Y

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01-03, 16, 29	5%	Rule 18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Monthly Readings
04-07, 18, 27, 28	5%	Rule 18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Inspector Observation
08	20%	Rule 19.503 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Inspector Observation
22, 23, 25	5%	Rule 18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Natural Gas Combustion

20. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

21. 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
Die Cleaning Ovens	A-1	0.49	0.001	0.01	0.16	0.19		0.01
Two (2) Diesel Fuel Storage Tanks, 250 gallons each	A-2			0.00042				0.00042
Twelve (12) Fragrance Tanks, 65 gallons each	A-2			0.0013				
Resin Transfer Blowers	A-13	1.61						
Conversion Bag Machines	A-13	0.18						

Source Name	Group A Category	Emissions (tpy)						
		PM/ PM_{10}	SO_2	VOC	CO	NO_x	HAPs	
							Single	Total
Miscellaneous Adhesive Usage	A-13			0.20			0.2	0.2
Scrap Film Reclaim Operations	A-13	0.23						
Extrusion Dosing & Erema Reclaim Resin Transfer	A-13	1.48						
Katara Process	A-13			0.40				
TOTAL A-13 EMISSIONS		3.50		0.60			0.20	0.20

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
0407-AOP-R13

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Glad Manufacturing Company
Permit Number: 0407-AOP-R14
AFIN: 04-00100

$/ton factor	28.14	Annual Chargeable Emissions (tpy)	202.5
Permit Type	Modification	Permit Fee $	1000

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	☐
If Hold Active Permit, Amt of Last Annual Air Permit Invoice $	0
Total Permit Fee Chargeable Emissions (tpy)	-1.6
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 condensible 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		70.8	70.8	0		
PM_{10}		70.8	70.8	0	0	70.8
$PM_{2.5}$		0	0	0		
SO_2		0.3	0.3	0	0	0.3
VOC		123.4	130.6	7.2	7.2	130.6
CO		20.9	1.4	-19.5		
NO_X		9.6	0.8	-8.8	-8.8	0.8
Total HAPs	☐	0.93	0.61	-0.32		