

STATEMENT OF BASIS

For the issuance of Air Permit # 0407-AOP-R15 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<br>(New, Renewal, Modification,<br>Deminimis/Minor Mod, or<br>Administrative Amendment) | Short Description of Any Changes<br>That Would Be Considered New or<br>Modified Emissions |
|---------------------|-------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| 8/25/2025           | Minor Mod                                                                                                   | New resin formulation (SN-06) and<br>reclaim system (SN-04)                               |

6. REVIEWER'S NOTES:

With this minor modification, the facility is requesting the following changes:

- Modify emissions from the extrusion towers (SN-06) to account for a new resin formulation.
- Modify emissions from the reclaim transport (SN-04) to account for a new reclaim system and removal of two wrap blowers.
- Update emissions from the Katara Process (IA-13) based on new testing results.

The facility’s permitted annual emissions are increasing by 0.60 tpy total HAPs. The facility’s permitted annual emissions are decreasing by 3.2 tpy PM/PM<sub>10</sub>.

7. COMPLIANCE STATUS:

As of August 25, 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 28, 2025.

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<br>(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 |
|--------|----------------------|-----------------------------------------------------|
| 04     | PM <sub>10</sub>     | The control device is inherent process equipment    |

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<sub>2</sub>S 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<sub>2</sub>S Standards

Y

If exempt, explain: the facility does not have H<sub>2</sub>S 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<br>02<br>03<br>16<br>29 | Testing                                       | PM/PM <sub>10</sub> from railcar:<br>0.020 gr/scf                                                                 | Filtair<br>Fabric<br>Filter | 99% +                        | SN-01, 02, 03,<br>16: 2,600 scfm<br>SN-29: 1,300<br>scfm                      |
|                            |                                               | PM/PM <sub>10</sub> to silos:<br>0.030 gr/scf                                                                     |                             |                              |                                                                               |
| 04                         | Testing                                       | Reclaim to Hopper<br>PM/PM <sub>10</sub> : 0.020 gr/scf<br>Hopper to Silo<br>PM/PM <sub>10</sub> : 0.03 gr/scf    | Fabric<br>Filter            | 99% +                        | 3 blowers<br>Reclaim to<br>Hopper: 870<br>scfm<br>Hopper to Silo:<br>426 scfm |
| 05                         | Testing                                       | PM/PM <sub>10</sub> : 0.020 gr/scf                                                                                | Fabric<br>Filter            | 99% +                        | Flowrate: 6,740<br>scfm                                                       |
| 06                         | Testing                                       | PM/PM <sub>10</sub> : 0.048<br>lb/hr/exhaust<br>VOC: 0.29 lb/hr/exhaust<br>HAP: 0.0097 lb/hr/exhaust              | None                        | N/A                          | 20 exhausts                                                                   |
| 07                         | Testing                                       | PM/PM <sub>10</sub> : 0.065 lb/ton<br>VOC: 0.095 lb/ton<br>HAPs: 0.002 lb/ton                                     | None                        | N/A                          | 4 machines<br>1,300 lb/hr per<br>machine                                      |
| 08                         | Testing                                       | PM/PM <sub>10</sub> : 0.813/ton<br>VOC: 1.152 lb/ton<br>HAPs: 0.004 lb/ton                                        | None                        | N/A                          | 11,388 tpy<br>production                                                      |
| 15                         | Mass<br>Balance                               | <u>Suffocation Warnings</u><br>Ink VOC content: 4.6 lb/gal<br>Makeup VOC content: 3.0<br>lb/gal<br>No HAP content | None                        | N/A                          | 100%<br>evaporative loss                                                      |
|                            |                                               | <u>Case Coders</u><br>Ink VOC content: 0.13<br>lb/gal<br>No HAP content                                           | None                        | N/A                          |                                                                               |
| 18                         | Testing                                       | PM/PM <sub>10</sub> : 0.42 lb/hr/exhaust<br>VOC: 0.98 lb/hr/exhaust<br>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 <sub>10</sub> :<br>11,220 gal/min<br>Drift Rate: 20%<br>Total Dissolved Solids: 737 ppm                                                                                               | None              | N/A                          | -                                                                               |
| 21       | Testing                                       | <u>Fragrance Application</u><br>1000 ft/min<br>490 bags/min<br>80 mg/bag<br>35 machines<br>0.4% evaporation rate                                                                            | None              | N/A                          | 250 tons fragrance per year permit limit                                        |
|          |                                               | <u>Scrap/Reclaim</u><br>12% scrap/reclaim rate of finished product<br>100% evaporation rate                                                                                                 | None              | N/A                          |                                                                                 |
| 22       | Manufacturer Spec                             | VOC: 0.84 g/hp-hr<br>CO: 22.3 g/hp-hr<br>NOx: 5.08 g/hp-hr                                                                                                                                  | None              | N/A                          | 36 hp<br>294 scf/hr<br>500 hr/yr                                                |
|          | AP-42, 3.2 4SRB                               | SO <sub>2</sub> : 5.88E-04 lb/MMBtu<br>PM/PM <sub>10</sub> : 0.0194 lb/MMBtu<br>HAPs: 3.24E-02 lb/MMBtu                                                                                     | None              | N/A                          |                                                                                 |
| 23<br>25 | AP-42, 3.2 4SRB                               | NO <sub>x</sub> : 2.210 lb/MMBtu<br>CO: 3.720 lb/MMBtu<br>VOC: 2.96E-02 lb/MMBtu<br>SO <sub>2</sub> : 5.88E-04 lb/MMBtu<br>PM/PM <sub>10</sub> : 0.0194 lb/MMBtu<br>HAPs: 3.24E-02 lb/MMBtu | None              | N/A                          | SN-23: 32 hp,<br>0.224 MMBtu/hr<br>SN-25: 82 hp,<br>0.574 MMBtu/hr<br>500 hr/yr |
| 27       | Testing                                       | PM/PM <sub>10</sub> : 0.11 lb/hr/exhaust<br>VOC: 0.66 lb/hr/exhaust<br>HAP: 0.0053 lb/hr/exhaust                                                                                            | None              | N/A                          | 2 exhausts                                                                      |
| 28       | Testing                                       | PM/PM <sub>10</sub> : 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<br>Makeup VOC: 3.0 lbs/gal<br>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/<br>PM <sub>10</sub> | SO <sub>2</sub> | VOC     | CO   | NO <sub>x</sub> | 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/<br>PM <sub>10</sub> | SO <sub>2</sub> | VOC  | CO | NO <sub>x</sub> | 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             |                         |                 | 1.51 |    |                 |        |       |
| TOTAL A-13 EMISSIONS                            |                  | 3.50                    |                 | 1.71 |    |                 | 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-R14 |

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-R15  
 AFIN: 04-00100

|               |           |                                   |       |
|---------------|-----------|-----------------------------------|-------|
| \$/ton factor | 28.14     | Annual Chargeable Emissions (tpy) | 199.3 |
| 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)                                   | -3.2                     |
| 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       | 67.6       | -3.2                |                                 |                             |
| PM <sub>10</sub>  |                              | 70.8       | 67.6       | -3.2                | -3.2                            | 67.6                        |
| PM <sub>2.5</sub> |                              | 0          | 0          | 0                   |                                 |                             |
| SO <sub>2</sub>   |                              | 0.3        | 0.3        | 0                   | 0                               | 0.3                         |
| VOC               |                              | 130.6      | 130.6      | 0                   | 0                               | 130.6                       |
| CO                |                              | 1.4        | 1.4        | 0                   |                                 |                             |
| NO <sub>x</sub>   |                              | 0.8        | 0.8        | 0                   | 0                               | 0.8                         |
| Total HAPs        | <input type="checkbox"/>     | 0.61       | 1.21       | 0.6                 |                                 |                             |