

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0407-AOP-R2 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. NAICS DESCRIPTION AND CODE:

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

5. SUBMITTALS:

2/6/2013

6. REVIEWER'S NOTES:

This modification is a minor modification adds a new 19 kW natural gas fired emergency generator. This permit also removes two insignificant activities. The two activities are emergency generators which now are subject the MACT standards and no longer qualify as insignificant activities. Those engines are now unpermitted sources at the facility.

7. COMPLIANCE STATUS:

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

The previous permit and this permit contain a requirement to submit an application to incorporate the provisions of Subpart ZZZZ and JJJJ for two engines previously listed as

insignificant. The facility did not submit this application in the time frame specified in the condition. This was reported to the enforcement section.

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, or
 - CO_2 e potential to emit $\geq 100,000$ tpy and ≥ 100 tpy ≥ 250 tpy of combined GHGs?

If yes, explain why this permit modification is not PSD.

9. GHG MAJOR SOURCE (TITLE V):

Indicate one:

- Facility is classified as a major source for GHG and the permit includes this designation
- Facility does not have the physical potential to be a major GHG source
- Facility has restrictions on GHG or throughput rates that limit facility to a minor GHG source. Describe these restrictions: _____

10. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
22 and two unpermitted	HAPs	MACT ZZZZ
22	Criteria	NSPS JJJJ

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

a) NAAQS:

- (i) List the reason for a NAAQS evaluation (i.e. what changes are being permitted that would require the evaluation) and pollutants affected. If a NAAQS evaluation is not required, indicate why not.

The only increase in emissions is from an emergency engine. No modeling is necessary.

b) Non-Criteria Pollutants:

This permit contains a set HAP TLV limit based on previous permit modeling.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
22	AP-42	Varied	None	N/A	

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
No testing was added in this permit.				

15. 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 was added in this permit.				

16. 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)
22	Hours of operation Maintenance	None Subpart JJJJ requirements	As needed	Y

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
22	5%	Department Guidance	Natural gas combustion only

18. DELETED CONDITIONS:

Former SC	Justification for removal
No conditions were deleted	

19. 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						

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
0407-AOP-R1

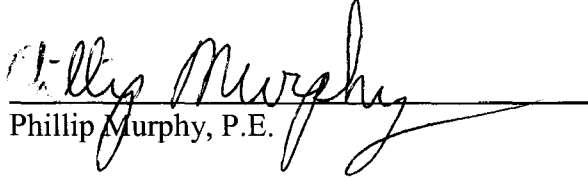
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21. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.


Phillip Murphy, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 08-26-13

Glad Manufacturing Company
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\$/ton factor	23.42	Annual Chargeable Emissions (tpy)	274.6
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)	2.1
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		75.3	75.4	0.1		
PM ₁₀		75.3	75.4	0.1	0.1	75.4
SO ₂		0	0.1	0.1	0.1	0.1
VOC		197.2	197.3	0.1	0.1	197.3
CO		0	7.8	7.8		
NO _x		0	1.8	1.8	1.8	1.8
HAPs	<input type="checkbox"/>	3.52	3.52	0		