

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0407-AOP-R3 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:

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
7/9/2014	Modification	Added two existing emergency engines to the permit.

6. REVIEWER'S NOTES:

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.

This modification adds two existing natural gas fired emergency engines to the permit.

7. COMPLIANCE STATUS:

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

The engines in this modification are existing engines subject to Subpart ZZZZ.
Compliance was notified.

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)
22	Criteria	NSPS JJJJ
22, 23, 24	HAPs	MACT ZZZZ

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

a) NAAQS:

This permit decision did not involve an Arkansas Department of Pollution Control & Ecology Regulation 19, Chapter 9 permit (PSD) requiring dispersion modeling.

b) Non-Criteria Pollutants:

Non Criteria Pollutant emission rates were not changed and were not evaluated.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
23 and 24	AP-42	Varied	none		

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
No testing was added to the permit.				

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 was added to the permit.				

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)
23 and 24	Subpart ZZZZ records	None	Monthly or per event	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
23 and 24	5%	Department Guidance	Natural gas combustion

17. DELETED CONDITIONS:

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Former SC	Justification for removal
Plantwide 7	Was a requirement to submit the application for this modification.

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
No insignificant activities were changed.								

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0407-AOP-R2

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 08-25-14

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\$/ton factor	23.89	Annual Chargeable Emissions (tpy)	283
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	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	8.4
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		75.4	75.6	0.2		
PM ₁₀		75.4	75.6	0.2	0.2	75.6
SO ₂		0.1	0.3	0.2	0.2	0.3
VOC		197.3	197.5	0.2	0.2	197.5
CO		7.8	20.9	13.1		
NO _x		1.8	9.6	7.8	7.8	9.6
HAPs	<input type="checkbox"/>	3.52	3.52	0		
	<input type="checkbox"/>	0	0	0		

