

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0407-AOP-R7 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:

Joseph Hurt

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
3/30/2016	Minor Modification	Installation of three (3) additional Extrusion Towers to SN-06, Extrusion Towers 18 through 20; and Installation of 16 new ink jet printers due to the new blanket machines and increased fragrance application due to the new blanket machines.

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. Glad Manufacturing Company has submitted a minor modification application to request:

- Installation of three (3) additional Extrusion Towers to SN-06, Extrusion Towers 18 through 20;
- Installation of eight (8) additional blanket machines to the list of insignificant activities;
- Installation of 16 new ink jet printers due to the new blanket machines and increased fragrance application due to the new blanket machines;
- Relocation of one of the shroud cooling exhausts from Extrusion Tower 2 to Extrusion Tower 13; and
- Removal of two (2) Glad Lock® manufacturing lines and associated curing oven.

The total permitted emission decreases include 9.3 tpy of PM, 9.3 tpy of PM₁₀, 5.0 tpy of VOC, and 0.05 tpy of HAPs.

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 current or pending compliance issues or enforcement actions against the facility.

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, 25	HAPs	MACT ZZZZ

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

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

c) H₂S 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 H₂S Standards Y
 If exempt, explain: _____ no H₂S emissions _____

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H ₂ S	20 parts per million (5-minute average*)	N/A	N/A
	80 parts per billion (8-hour average) residential area	N/A	N/A
	100 parts per billion (8-hour average) nonresidential area	N/A	N/A

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, 16	Testing	PM/PM ₁₀ from railcar: 0.020 gr/scf	Filtair Fabric Filter	99% +	
		PM/PM ₁₀ to silos: 0.030 gr/scf			
04, 17	Testing	PM/PM ₁₀ : 0.020 gr/scf	Fabric Filter	99% +	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
05	Testing	PM/PM ₁₀ : 0.020 gr/scf	Fabric Filter	99% +	
06	Testing	PM/PM ₁₀ per Exhaust: 0.048 lb/hr	-	-	
		VOC per Exhaust: 0.29 lb/hr	-	-	
		HAP per Exhaust: 0.0023 lb/hr	-	-	
07	Testing	PM/PM ₁₀ : 0.065 lb/ton	-	-	
		VOC: 0.095 lb/ton	-	-	
08	Testing	PM/PM ₁₀ : 0.813/ton	-	-	
		VOC: 1.152 lb/ton	-	-	
09	Manufacture Limit	PM/PM ₁₀ : 10,000 scfm	-	-	
		PM/PM ₁₀ : 0.24 lb/hr	-	-	
15	Manufacture Limit	Ink Domino VOC: 6.00 lb/gal coating MEK: 4.4 lb/gal coating DEHP: 0.315 lb/gal coating Methanol: 0.094 lb/gal coating Non-MEK HAP: 0.409 lb/gal coating	-	-	
		Make Up- Domino VOC: 7.00 lb/gal coating MEK: 5.93 lb/gal coating Methanol: 0.11 lb/gal coating Non-MEK HAP: lb/gal coating	-	-	
15A		New Ink: VOC: 7.72 lb/gal coating Glycol Ether: 0.45 lb/gal	-	-	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		coating Non-MEK HAP: 0.45 lb/gal coating			
18	Testing	PM/PM ₁₀ per Exhaust: 0.42 lb/hr	-	-	
		VOC per Exhaust: 0.98 lb/hr	-	-	
		HAP per Exhaust: 0.0039 lb/hr	-	-	
19	Testing	VOC: 0.05 lb/lb	-	-	
		Max throughput: 28lb/hr	-	-	
20	Testing	PM/PM ₁₀ : 11,220 gal/min	-	-	
		Drift Rate: 20%	-	-	
		Total Dissolved Solids: 737ppm	-	-	
21	Testing	Blanket Machines- Fragrance Application: Fragrance evaporation rate (wt%): 20.00%	-	-	
		Blanket Machines- Scrap/Reclaim: Fragrance evaporation rate (wt%): 6.00%	-	-	
22, 23, 25	AP-42	NO _x : 2.210 lb/MMBtu	-	-	
		CO : 3.720 lb/MMBtu	-	-	
		VOC : 0.030 lb/MMBtu	-	-	
		SO ₂ : 0.000588 lb/MMBtu	-	-	
		PM/PM ₁₀ : 0.0194 lb/MMBtu	-	-	
26	Testing	VOC: 0.05 lb/lb	-	-	
		Max throughput: 114lb/hr	-	-	

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

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)
N/A				

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: 7.0lbs/gal 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
26	Adhesive Throughput	998,640 pounds	Monthly	Y
22, 23, 25	Subpart ZZZZ	None	Monthly or per event	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Hours of Operation	350 hours	Calendar year	Y

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01-03, 16	5%	Department Guidance	Weekly Readings
04-07, 09, 18	5%	Department Guidance	§18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311
08	20%	Department Guidance	§19.503 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311
22, 23, 25	5%	Department Guidance	Natural Gas Combustion

17. DELETED CONDITIONS:

Former SC	Justification for removal
SC 17 – 19	The facility has removed these sources.

18. GROUP A INSIGNIFICANT ACTIVITIES:

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	A-2			0.00042				0.00042

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Storage Tanks, 250 gallons each								
Miscellaneous Adhesive Usage	A-13			0.2			0.2	0.2
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	0.25						

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
0407-AOP-R6

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-R7
 AFIN: 04-00100

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	293.7
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)	-14.3
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		75.6	66.3	-9.3		
PM ₁₀		75.6	66.3	-9.3	-9.3	66.3
PM _{2.5}		0	0	0		
SO ₂		0.3	0.3	0	0	0.3
VOC		222.5	217.5	-5	-5	217.5
CO		20.9	20.9	0		
NO _x		9.6	9.6	0	0	9.6
HAPs	<input type="checkbox"/>	3.52	3.47	-0.05		