

STATEMENT OF BASIS

For the issuance of Air Permit # 0407-AOP-R9 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:

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
8/2/2018	Administrative Amendment	Equipment cleaning operation as A-13

6. REVIEWER'S NOTES:

Glad Manufacturing Company has submitted an administrative amendment to remove SN-09 from the permit. Emissions from this process are routed to the 15,000 CFM reclaim dust collector and are accounted for in the reclaim operations listed in the insignificant activities list. Additionally, this modification adds equipment cleaning operation to the insignificant activities list as group A-13. The facility's permitted annual emissions are decreasing by 1.1 tpy PM/PM₁₀.

7. COMPLIANCE STATUS:

As of August 2, 2018, there are no compliance issues with the facility.

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	MACT ZZZZ

10. 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 Regulation 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		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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 ADEQ Air Permit Screening Modeling Instructions.

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:

The facility does not have any H₂S emissions.

13. 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% +	
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	-	-	
15	Manufacture Limit	Ink Domino VOC: 6.00 lb/gal coating	-	-	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments	
		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 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	-	-		

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
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	-	-	

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

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)
N/A				

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)
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
	Hours of Operation	350 hours	Calendar year	Y

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01-03, 16	5%	Department Guidance	Weekly Readings
04-07, 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

SN	Opacity	Justification for limit	Compliance Mechanism
22, 23, 25	5%	Department Guidance	Natural Gas Combustion

18. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

19. 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 Storage Tanks, 250 gallons each	A-2			0.00042				0.00042
Miscellaneous Adhesive Usage	A-13			0.20			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						
Extrusion Dosing & Erema Reclaim Resin Transfer	A-13	1.48						
Equipment Cleaning Operation	A-13			4.46				
TOTAL A-13 EMISSIONS		3.52		4.66			0.20	0.20

Permit #: 0407-AOP-R9

AFIN: 04-00100

Page 8 of 8

20. 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-R8

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-R9
 AFIN: 04-00100

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	292.6
Permit Type	AA	Permit Fee \$	0

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)	-1.1
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		66.3	65.2	-1.1		
PM ₁₀		66.3	65.2	-1.1	-1.1	65.2
PM _{2.5}		0	0	0		
SO ₂		0.3	0.3	0	0	0.3
VOC		217.5	217.5	0	0	217.5
CO		20.9	20.9	0		
NO _x		9.6	9.6	0	0	9.6
HAPs	<input type="checkbox"/>	3.47	3.47	0		