

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 407-AR-11 AFIN: 04-00100

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

2. APPLICANT:

Glad Manufacturing Company
1700 N. 13th Street
Rogers, Arkansas 72756

3. PERMIT WRITER:

Shawn Hutchings

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Polyethylene bag and wrap manufacturing
NAICS Code: 326113

5. SUBMITTALS:

October 8, 2007, November 20, 2007

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. Glad is adding a polyethylene reclaim operation. Permitted emissions will increase 1.8 tons per year. Emissions from the previous permit are actually lower due to a source in the last permit being counted twice.

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 known enforcement issues with the facility

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
 Has the facility undergone PSD review in the past? N
 Is the facility categorized as a major source for PSD?
 ≥ 100 tpy and on the list of 28? N
 ≥ 250 tpy all other? N

PSD Netting

Was netting performed to avoid PSD review in this permit? N

Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
none		

9. EMISSION CHANGES:

The following table summarizes plantwide emission changes associated with this permitting action.

Plantwide Permitted Emissions (tpy)			
Pollutant	Permit # 405-AOP-R10	Permit #407-AR-11	Change
PM	56.9	54.4	-2.5
PM ₁₀	56.9	54.4	-2.5
VOC	93	93	0
HAPs	2.2	2.2	0

10. MODELING:

Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

Non-Criteria Pollutants:

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This permit contains a specific TLV limit for non-criteria pollutants. Modeling was used to determine the highest TLV HAP that passes the PAIL which the facility could use at its only HAP emitting source. Therefore, modeling of specific non-criteria pollutants was not performed.

11. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
17	Grain loading	Varied per type of operation	Filters	N/A	

12. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
There was no addition testing added to the permit.				

13. MONITORING OR CEMS

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

There was no monitoring or CEM requirements added to the permit.

14. RECORD KEEPING 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)
1, 2, 3, and 16	Polyethylene pellet throughput	120 tons/hr 300,000 tons per year	Monthly	N

15. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
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SN	Opacity	Justification for limit	Compliance Mechanism
SN-1, 2, 3 and 16	5%	Department Guidance	Inspector to verify compliance upon inspection
All others	20%	Department Guidance	Inspector to verify compliance upon inspection

16. DELETED CONDITIONS:

No conditions were removed.

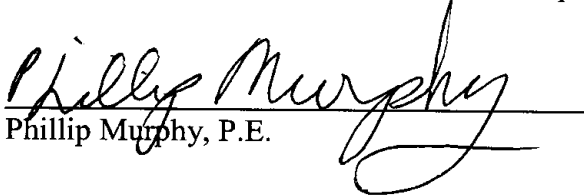
17. VOIDED, SUPERCEDED, OR SUBSUMED PERMITS:

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

Permit #
405-AOP-R10

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.


Phillip Murphy, P.E.