

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0407-AR-12 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. PROCESS DESCRIPTION AND NAICS CODE:

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

NAICS Code: 326113

5. SUBMITTALS:

2/28/2008

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 is increasing the allowed VOC content at SN-15. This change will account for a permitted increase of 2 tons per year of VOC from the source.

7. COMPLIANCE STATUS:

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

This permit is the result of a CAO. Glad was found out of compliance for an ink with a VOC content higher than their permit allowed.

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 not PSD?

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
none		

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. 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:

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLV) that pass the PAER or PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
15	VOC Usage	6.0 lb/gal	None		

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

There was no testing required in the permit.

14. MONITORING OR CEMS

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

There are no monitoring or CEMs required in 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)
15	VOC usage and contents	20 tons and 6.0 lb/gal	Monthly	N

16. OPACITY:

No opacity limits were changed.

17. DELETED CONDITIONS:

Former SC	Justification for removal
No conditions were deleted.	

18. GROUP A INSIGNIFICANT ACTIVITIES

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

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19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
0407-AR-11

20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

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Phillip Murphy, P.E.

**APPENDIX A – EMISSION CHANGES AND FEE CALCULATION**

