

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0407-AR-7 AFIN: 04-00100

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality  
8001 National Drive  
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Glad Manufacturing Company  
1700 North 13<sup>th</sup> Street  
Rogers, Arkansas 72756

3. PERMIT WRITER:

Paul Osmon

4. PROCESS DESCRIPTION AND NAICS CODE:

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

5. SUBMITTALS:

March 7, 2005

6. REVIEWER'S NOTES:

This permit modification is issued to allow the facility to increase the polyethylene extrusion blown film towers at SN-06 from 16 to 18, to replace the current water based suffocation hazard warning printers with up to fifteen ink jet printers (the emission of which will be accounted for in SN-15 – non-point source VOC emissions), and to revise the process description to more adequately describe the process and to reflect that some of the equipment has been removed from service.

The new extrusion blown film towers will have emissions of 0.26 lb/hr and 1.13 tpy VOC each. They will be added to the existing emissions from the 16 current extrusion blown film towers which are not all the same size. Annual emissions are based on 8760 hrs/yr but the throughput limit of polyethylene limits actual emissions to less than the total of all individual limits.

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 known active/pending enforcement actions or compliance activities and issues related to this 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? N  
     ≥ 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	NA	NA

9. EMISSION CHANGES:

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

Plantwide Permitted Emissions (tpy)			
Pollutant	Permit # 406-AR-6	Permit # 407-AR-7	Change
PM	47.8	42.3	-5.5
PM <sub>10</sub>	47.8	42.3	-5.5
SO <sub>2</sub>	1.0	0.5	-0.5
VOC	56.9	74.5	17.6
CO	1.1	0.6	-0.5
NO <sub>x</sub>	1.0	0.8	-0.2

Permit #: 0407-AR-7

AFIN: 04-00100

Page 3 of 6

Plantwide Permitted Emissions (tpy)			
Ozone	1.0	0	-1.0
Methyl Ethyl Ketone	2.3	5.0	2.7
Methanol	0.3	0.3	0
Other HAPS	0.2	0.2	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:

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
MEK	590	64.9	0.2	Y
Methanol	262	28.82	0.1	Y
RT 1.0 HAPS	100 (pseudo)	11	0.1	Y

Other Modeling: No styrene or hydrogen sulfide emissions from this facility.

11. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
No new calculations this modification					

12. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
No testing requirements in this permit.				

13. 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 or CEMS in this 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)
Facility	Polyethylene processed	300,000 tons per 12 months	Monthly	N
Facility	Natural gas usage	0.865 MMSCF per 12 months	Monthly	N
Facility	HAP Usage	MEK – 5 tpy Methanol – 0.3 tpy Other HAP – 0.2 tpy	Monthly	N

15. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
All	20%	Department Standard	---

16. DELETED CONDITIONS:

Former SC	Justification for removal
None	NA

17. VOIDED, SUPERCEDED, OR SUBSUMED PERMITS:

Permit #: 0407-AR-7

AFIN: 04-00100

Page 6 of 6

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

Permit #
0407-AR-6

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

\_\_\_\_\_  
Thomas Rheaume, P.E.