

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0407-AR-8 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 13th Street
Facility City, 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:

May 31, 2005

6. REVIEWER'S NOTES:

This permit modification is issued to change some emission limits for sources similar to those recently stack tested at a similar facility in Virginia. No emissions testing data previously existed for this type of source and there were questions concerning the nature of the pollutant (whether it was VOC or particulate). Natural gas combustion emissions have been removed from the permitted sources since they are now in the Insignificant Activity List.

7. COMPLIANCE STATUS:

This facility currently has a no penalty CAO based on their self reporting emission limits with exceedances based on stack testing of a similar process at a facility in Virginia. The permit modification corrects the emission limits where there should not be any exceedances in current operations.

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	

9. EMISSION CHANGES:

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

Plantwide Permitted Emissions (tpy)			
Pollutant	Permit # 0407-AR-7	Permit # 0407-AR-8	Change
PM	42.3	52.6	10.3
PM ₁₀	42.3	52.6	10.3
SO ₂	0.5	0	- 0.5
VOC	74.4	86.0	11.6
CO	0.6	0	- 0.6
NO _x	0.8	0	- 0.8
Total HAP	5.5	8.1	2.6
Methyl Ethyl Ketone	5.0	5.9	0.9
Methanol	0.3	0	- 0.3
Other HAP	0.2	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:

1st 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/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
MEK	590	64.9	1.4	Y
RT 1.0 HAPS	100 (pseudo)	11	0.5	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
01 02 03	OEM Spec.	0.02 gr/scf	Filters	-	Emission factor is controlled
07 08 10 11	Stack Testing	-	-	-	-
15	Material Balance	-	None	NA	-
05 06 07 09	No changes in this modification				

12. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
No testing requirements				

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				

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	HAP Usage	MEK – 5.9 tpy Other HAP – 2.2 tpy	Monthly	N

15. OPACITY:

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

16. DELETED CONDITIONS:

Former SC	Justification for removal
Part SC #7	Natural gas limit is not required because there is no longer natural gas combustion in the emission units.

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17. VOIDED, SUPERCEDED, OR SUBSUMED PERMITS:

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

Permit #
0407-AR-7

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

Thomas Rheume, P.E.