

## **STATEMENT OF BASIS**

*for the issuance of Draft Air Permit # 1197-AR-3*

**1. PERMITTING AUTHORITY:**

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

**2. APPLICANT:**

Rock-Tenn Company  
329 Industrial Park Road  
Harrison, Arkansas 72601

**3. PERMIT WRITER:**

Michael H. Watt

**4. PROCESS DESCRIPTION AND SIC CODE:**

SIC Description: Printed Paperboard Carton Manufacturer  
SIC Code: 2657

**5. SUBMITTALS:** Dec 15, 2000

**6. REVIEWER'S NOTES:**

The Rock-Tenn Company located on Industrial Park Road in Harrison manufactures folding printed paperboard cartons. This modification increases the HAP lb/gal limit for the Offset Press (SN-01) fountain solutions from 1.0 lb/gal to 3.0 lb/gal. This change does not increase any of the permitted VOC or HAP limits. This facility is categorized as a minor source and is subject to the MACT regulation for Printing and Publishing.

**7. COMPLIANCE STATUS:** The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues

This facility is in compliance.

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**8. APPLICABLE REGULATIONS:**

**A. Applicability**

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera) (Y/N)   N  

Has this facility underwent PSD review in the past (Y/N)   N   Permit # \_\_\_\_\_

Is this facility categorized as a major source for PSD? (Y/N)   N  

\$ 100 tpy and on the list of 28 (100 tpy)? (Y/N)   N  

\$ 250 tpy all other (Y/N)   N  

**B. PSD Netting**

Was netting performed to avoid PSD review in this permit? (Y/N)       N      

**C. Source and Pollutant Specific Regulatory Applicability**

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
Plantwide	VOC/HAP	NSPS Part 63, KK

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**9. EMISSION CHANGES:**

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

<b>Plantwide Permitted Emissions (ton/yr)</b>			
<b>Pollutant</b>	<b>Air Permit 1197-AR-2</b>	<b>Air Permit 1197-AR-3</b>	<b>Change</b>
PM <sub>10</sub>	26.0	26.0	0
PM	26.00	26.00	0
VOC	70.0	70.0	0
Acetone	5.00	5.00	0
Ammonia	10.00	10.00	0
HAPs	9.00	9.00	0
Methylene Chloride	0.0	0.0	0

**10. MODELING:**

**A. 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.

**11. 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 TLVs) which would pass the *PAER or PAIL*. Therefore, modeling of specific non-criteria pollutants was not performed.

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**12. CALCULATIONS:**

<b>SN</b>	<b>Emission Factor Source (AP-42, Testing, etc)</b>	<b>Emission Factor and units (lbs/ton, lbs/hr, etc)</b>	<b>Control Equipment Type ( if any)</b>	<b>Control Equipment Efficiency</b>	<b>Comments (Emission factor controlled/uncontrolled, etc)</b>
01	MSDS	See VOC limits and TLV table.	None.	-	-
02	MSDS	See VOC limits and TLV table.	None.	-	-
03	MSDS	See VOC limits and TLV table.	None.	-	-
04	AP-42	0.01 gr/scf	Cyclone		
05	AP-42	0.01 gr/scf	Cyclone		
06	MSDS	See VOC limits and TLV table.	None.	-	-
07	MSDS	See VOC limits and TLV table.	None.	-	-

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**13. TESTING REQUIREMENTS:**

This permit requires no stack testing.

**14. MONITORING OR CEMS**

There are no parameters that must be monitored with CEMs or other monitoring equipment.

**15. RECORD KEEPING REQUIREMENTS**

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

<b>SN</b>	<b>Recorded Item</b>	<b>Limit (as established in permit)</b>	<b>Frequency *</b>	<b>Report (Y/N)**</b>
Plantwide	VOC/HAP usage	Calculate emissions	Monthly	N

\* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

\*\* Indicates whether the item needs to be included in reports

**16. OPACITY**

<b>SN</b>	<b>Opacity %</b>	<b>Justification (NSPS limit, Dept. Guidance, etc)</b>	<b>Compliance Mechanism (daily observation, weekly, control equipment operation, etc)</b>
04	20%	Dept Guidance	
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**17. DELETED CONDITIONS:**

There were no conditions deleted.

**18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS**

List all active permits for this facility which are voided/superseded/subsumed by issuance of this permit.

Permit #
1197-AR-2

**19. CONCURRENCE BY:**

The following supervisor concurs with the permitting decision:

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*Tom Rheume, P.E.*