

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1331-AOP-R1

1. PERMITTING AUTHORITY:

Arkansas Department of Pollution Control and Ecology
8001 National Drive
Post Office Box 8913
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Arkansas Poly, Inc.
1248 South 28th Street
Van Buren, Arkansas 72956

3. PERMIT WRITER:

Paul Osmon

4. PROCESS DESCRIPTION AND SIC CODE:

SIC Description: Plastic Bag Manufacturing
SIC Code: 3081

5. SUBMITTALS: July 29, 1998

6. REVIEWER'S NOTES:

This permit modification is for the addition of a 4 color printing press and its associated two gas fired dryers. The PAL for VOC from the inks and solvents used is continued at 247.0 tpy (no increase) but the permitted VOC does increase due to the natural gas combustion from the additional dryers. Previous permit engineer rounded the tpy of each pollutant from each dryer to 0.5 tpy (actual is less than 0.1 tpy). Current permit will have these only rounded to 0.4 to prevent the facility from being erroneously listed as a major source.

Permittee is subject to 40 CFR Part 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry and has agreed to limit emissions of any single HAP to less than 10 tpy and emissions of total HAP to less than 25 tpy to the facility remains only an area source.

7. APPLICABLE REGULATIONS:

NSPS (Y/N) N If yes, subpart N/A
 NESHAP (Y/N) Y If yes, subpart KK
 PSD applicability (Y/N) N
 Is facility on 28 list (100 tpy)? (Y/N) N
 Was netting performed to avoid PSD review (Y/N) N

Indicate increases and decreases used in netting for PSD purposes only.

Emission Source	Pollutant Emission Rate (TPY)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	Pb
Totals							
Significant Emission Rate	25	15	40	40	100	40	0.6
Subject to PSD?							

Subject to 112 (g) requirements (Y/N) N
 Subject to CAM requirements (Y/N) N
 Other applicable regulations

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8. EMISSION CHANGES:

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

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 1331-AOP-R0	Air Permit 1331-AOP-R1	Change
PM/PM ₁₀	2.0	2.4	0.4
SO ₂	2.0	2.4	0.4
VOC	249.0	249.4	0.4
CO	2.0	2.4	0.4
NO _x	2.0	2.4	0.4
Methanol	3.6	4.4	0.8
Methyl Isobutyl Ketone	2.3	2.7	0.4

9. MODELING:

A. Criteria Pollutants

Pollutant	Emission Rate (lb/hr)	NAAQS Standard (µg/m³)	Averaging Time	Highest Concentration (µg/m³)	% of NAAQS
PM ₁₀	0.5	50	Annual	Not Significant	0%
		150	24-hour	Not Significant	0%
SO ₂	0.5	80	Annual	Not Significant	0%
		1,300	3-hour	Not Significant	0%
		365	24-hour	Not Significant	0%
NO _x	0.5	100	Annual	Not Significant	0%
VOC	83.1	0.12	1-hour (ppm)	0.02	17%
CO	0.5	10,000	8-hour	Not Significant	0%
		40,000	1-hour	Not Significant	0%

B. 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 PAER was deemed by the Department 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/m³)	PAER (lb/hr) = 0.11*TLV	Proposed lb/hr	Pass?
Methanol	262	28.82	2.6	Yes
MIBK	205	22.55	0.9	Yes

10. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
01 04 07 10	hourly is the equipment capacity; yearly is a PAL based on a material balance	lbs/hr tpy	None	-	All paints and solvents are accounted for in the presses
02 03 05 06 08 09	AP-42 factors for natural gas combustion	lbs/hr tpy	None	-	Only natural gas combustion products are accounted for in the dryers

11. TESTING REQUIREMENTS:

This permit requires stack testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
No stack testing				

12. MONITORING OR CEMS

The following are parameters that must be monitored with CEMs or other monitoring equipment (temperature, pressure differential, etc), frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Parameter or Pollutant to be Monitored	Method of Monitoring (CEM, Pressure Gauge, etc)	Frequency*	Report (Y/N)**
None				

* Indicate frequency of recording required for the parameter (Continuously, hourly, daily, etc.)
 ** Indicates whether the parameter needs to be included in reports.

13. 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.

SN	Recorded Item	Limit (as established in permit)	Frequency *	Report (Y/N)**
01 04 07 10	Material balance for VOC, each HAP, and total HAP used in the inks and solvents	247.0 tpy ink and solvent VOC 4.4 tpy methanol 2.7 tpy MIBK	Monthly	Y Y Y

* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)
 ** Indicates whether the item needs to be included in reports

14. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
All Dryers	5%	Department Guidance	Natural gas usage only

15. DELETED CONDITIONS:

The following Specific Conditions were included in the previous permit, but deleted for the current permitting action.

Former SC	Justification for removal
	None

16. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Thomas Rheume, P.E.