

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1331-AOP-R5 AFIN: 17-00100

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

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

3. PERMIT WRITER:

Patty Campbell, PE

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Plastics Packaging Film and Sheet (including Laminated)
Manufacturing
NAICS Code: 326112

5. SUBMITTALS:

3/19/2013 and 4/2/2013

6. REVIEWER'S NOTES:

Arkansas Poly, Inc. is a manufacturer of printed and unprinted polyethylene film and bags located at 1248 South 28th Street Van Buren, Crawford County, Arkansas 72956. This modification is necessary to allow the following:

1. Remove the 6-Color Flexographic Printing Press #2 (SN-04) and its associated Dryers (SN-05 and SN-06);
2. Install a Schiavi 8-Color Flexographic Printing Press (SN-08) and its associated Dryers (SN-09 and SN-10);
3. Require that current MSDSs or equivalent documentation be maintained for each VOC containing material (inks and solvents) used at the facility;
4. Require documentation of all scrap VOCs poundage that are properly shipped off-site to a disposal facility and thus subtracted as a credit or allowance from the facility's VOC emissions;
5. Add Greenhouse Gas (GHG) Status; and

6. Add Title VI Provisions.

The total permitted annual emission change associated with this permit is: -0.4 tpy NO_x.

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 no pending or active air enforcement issues.

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, or

• CO₂e potential to emit $\geq 100,000$ tpy and ≥ 100 tpy/ ≥ 250 tpy of combined GHGs?

If yes, explain why this permit modification is not PSD.

9. GHG MAJOR SOURCE (TITLE V):

Indicate one:

Facility is classified as a major source for GHG and the permit includes this designation

Facility does not have the physical potential to be a major GHG source

Facility has restrictions on GHG or throughput rates that limit facility to a minor GHG source. Describe these restrictions: _____

10. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility*	HAPs	NESHAP Subpart KK

* Does not apply because Facility is HAP-free.

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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).

Facility uses only HAP-free materials.

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01, 07, 08	MSDS Mass Balance	Varies	None	N/A	All inks and solvents are HAP-free. VOC totals may be reduced by documented % VOC scrap disposal.
02, 03, 09, 10	AP-42 Table 1.4-1 & -2	(lb/MMscf) PM/PM ₁₀ – 7.6 SO ₂ – 0.6 VOC – 5.5 CO – 84 NO _x – 100	None	N/A	Dryers Natural gas emission factors. Natural gas is only fuel used.

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01, 07, 08 (VOC Scrap)	VOC content limit by percent wt	24	Every Quarter (3 or 4 4-week periods)	§19.705 and A.C.A.

15. MONITORING OR CEMS:

No CEMS or other monitoring equipment (temperature, pressure differential, etc.) is required.

16. 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)
Facility	VOC Material Balance	249.0 tpy	Every 4-week period & 13 consecutive 4-week periods	Y
Facility	HAP Material Balance	0 tpy	Every 4-week period & 13 consecutive 4-week periods	Y
Facility	Keep MSDS or equivalent documents available	None	Keep current	N
Facility	Independent Lab results of VOC scrap, Purchase invoices and/or shipments of VOC scrap poundage	All VOC scrap credited (subtracted) from annual VOC tpy	Quarterly	N
Facility	Annual Compliance Certificate (ACC)	GP #21	Annually	Yes
Facility	Permit Renewal	Permit is valid for 5 years, beginning on date permit becomes effective and ends five (5) years later GP #3	Every 5 years, submit complete renewal application at least 6 months before permit expiration.	Yes

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02, 03, 09, 10 (Dryers)	5%	§18.501 & Natural gas only fuel	Annual Inspection by ADEQ Inspector

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18. DELETED CONDITIONS:

No conditions have been deleted.

19. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
None identified.								

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1331-AOP-R4

21. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

Paula Parker, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 08-20-12

Facility Name: Arkansas Poly, Inc.
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\$/ton factor	22.97	Annual Chargeable Emissions (tpy)	251.8
Permit Type	Modification	Permit Fee \$	1000

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	-0.4
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM: Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants: All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM	<input checked="" type="checkbox"/>	0.4	0.4	0	0	0.4
PM ₁₀	<input type="checkbox"/>	0.4	0.4	0		
SO ₂	<input checked="" type="checkbox"/>	0.4	0.4	0	0	0.4
VOC	<input checked="" type="checkbox"/>	249.4	249.4	0	0	249.4
CO	<input type="checkbox"/>	0.5	0.5	0		
NO _x	<input checked="" type="checkbox"/>	2	1.6	-0.4	-0.4	1.6
pc 4/2/13	<input type="checkbox"/>	0	0	0		