

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1440-AOP-R2, Renewal

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Arkansas Glass Container Corporation
516 West Johnson Street
Jonesboro, Arkansas 72403

3. PERMIT WRITER: James G. Siganos, P. E.

4. SIC DESCRIPTION AND SIC CODE:

NAICS Description: Glass Manufacturing-Containers for packaging, bottling & canning
NAICS Code: 327213

5. SUBMITTALS: December 19, 2002

6. REVIEWER'S NOTES:

Arkansas Glass Container Corporation owns and operates a glass container manufacturing facility in Jonesboro, Arkansas (Craighead County).

The purpose of this modification is to renew the previous Title V Permit # 1440-AOP-R1, which has an expiration date of June 24, 2003. No new construction or major modification is being proposed.

However, on January 2, 2003 the Division issued a letter of acceptance for a Title V Minor Modification allowing Arkansas Glass Container Corp to modify several miscellaneous pieces of natural gas fired equipment, designated as emission source SN-05, during a planned shutdown. These miscellaneous items of equipment are located and operated through the plant to facilitate the required heating of molten glass and other materials. Some equipment will be refurbished, some equipment will be removed, and two new pieces (mil ovens) of equipment will be added. This modification resulted in a decrease in the total firing rate, by 1,654,000 Btu/ hr, of the equipment designated as SN-05.

7. COMPLIANCE STATUS:

There are no known active/pending enforcement actions or compliance activities related to this facility.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera)? NO
 Has this facility undergone PSD review in the past? NO
 Is this facility categorized as a major source for PSD? YES
 \$ 100 tpy and on the list of 28 (100 tpy)? NO
 \$ 250 tpy all other YES

PSD Netting

Was netting performed to avoid PSD review in this permit? NO

Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD <u>only</u>]
Combined Sources	NOx	PSD (---major source status, not subject to PSD review for this modification)

NOTE: The glass melting furnaces at this facility are not subject to NSPS Subpart CC. The work performed on these sources since the applicability date of the standards (June 15, 1979) is exempt from the requirements, because re-bricking of furnace structures is expressly excluded from the regulation=s definition of reconstruction (60.292(c)).

9. EMISSION CHANGES:

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

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 1440-AOP-R1	Air Permit 1440-AOP-R2	Change
PM/PM ₁₀	126.2	126.2	0
SO ₂	63.3	63.3	0
VOC	94.0	94.0	0
CO	12.6	12.6	0
NO _x	653.1	653.1	0

10. MODELING:

Modeling was not performed because there are no changes in the plantwide permitted emissions changes. The data shown below was shown in the previous permit SOB.

A. Criteria Pollutants

The following criteria pollutants were modeled using ISCST3 dispersion software in order to predict their impact on the National Ambient Air Quality Standards (NAAQS). SO₂, VOC, and CO were not included in the modeling, because the magnitude of their estimated emissions do not indicate a potential threat (the estimated emissions are below Title V thresholds).

SN(s)	Pollutant	Proposed lb/hr	Guideline Concentration	Modeled Concentration	Pass ?
Plantwide	PM ₁₀	35.7	(0.50)*(50)annual=25ug/m ³ (0.50)*(150)24-hour=75ug/ m ³	4.8 ug/m ³ 4.0 ug/ m ³	Y
Plantwide	NO _x	177.4	(0.50)*(150) annual=50ug/ m ³	23.9 ug/ m ³	Y

11. **Non-Criteria Pollutants:** N/A: No non-criteria pollutants are expected to be emitted from this facility in significant quantities.

12. CALCULATIONS:

At source locations for which no comments appear below, the emission calculations received the reviewer's concurrence as submitted by the facility in the permit application.

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&03	PM-Glass Mfg Handbook	2.5 lb PM/ton glass	---	---	Uncontrolled Factors
	NOx-Stack Test Data	14.83 lb NOx/ton glass			
	CO, AP-42	0.2lbCO/ton glass			
	VOC- Stack Test Data	1lb VOC/ton glass			
	SO2-Stack Test Data	1.48 lb/ton glass			
O4A	Surrogate AP-42, 11.12-2	0.072 lb PM/ton	Fabric Sock	90%	Uncontrolled Factors
O4B	Surrogate AP-42, 11.12-2	0.0072 lb PM/ton	Fabric Sock	90%	Uncontrolled Factors
O4C	Surrogate AP-42, 11.12-2	0.072 lb PM/ton	Fabric Sock	90%	Uncontrolled Factors
O4D	Surrogate AP-42, 11.12-2	0.0036 lb PM/ton	Baghouse	99.5%	Uncontrolled Factors
O4E	Surrogate AP-42, 11.12-2	0.0036 lb PM/ton	Baghouse	99.5%	Uncontrolled Factors
O4F	Surrogate AP-42, 11.6-4	0.0031 lb PM/ton	Baghouse	Not used	Controlled
05	AP-42	Natural Gas Factor	---	---	Uncontrolled Factors
08	Surrogate AP-42, 11.6-4	0.00016 lb PM/ton	Baghouse	99.5%	Uncontrolled Factors
09	Conservative Estimate	100% Evaporation of volatiles	---	---	---

13. TESTING REQUIREMENTS:

This permit requires stack testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
01 & 03	PM/PM ₁₀	5	Five (5) year intervals (Each furnace shall be tested every five (5) years).	To help ensure ongoing compliance with criteria emission limits
	SO ₂	6C		
	VOC	25A		
	CO	10		
	NO _x	7E		

Note: Emissions testing was performed on Furnace A (SN-01) on February 12 and 13, 2002, and on Furnace “C” (SN-03) on March 18, and 19, 2003. Test emission rates for PM, PM₁₀, CO and NO_x were well below (within 45%) the permitted hourly emission rates. Emission rates for SO₂ and VOC also passed.

MONITORING OR CEMS

The permittee must monitor the following parameters with CEMs or other monitoring equipment (temperature, pressure differential, etc), frequency of recording and the need for records 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)**
04A,04B 04C, 04D, 04E, 04F, 08	Manufacturer's recommended specifications for fabric filters.	Procedure and Inspection	Routine inspection once per month.	N
04A,04B 04C, 04D, 04E, 04F, 08	Visible Emissions	Visual observation and Method 9 as needed.	At each loading event	N
08	Visible Emissions	Visual observation and Method 9 as needed.	Weekly	N

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

** Indicates whether the parameter needs to be included in reports.

14. 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.

The following specific conditions were included in Air Permit 1440-AOP-R0 to require record keeping and reporting of throughput, emissions, or operational parameters:

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
01, 03	Combined Raw Materials	280 ton/day 85,500 ton/yr	Daily	Y
04A, 04B, 04C, 04F	Feldspar/Nephelene	5,400 tons/yr	Monthly	Y
	Soda Ash	24,400 tons/yr		
	Cullet	46,400 tons/yr		
04D	Sand Storage	7,000 tons/yr	Monthly	Y
04E	Limestone Storage	16,000 tons/yr	Monthly	Y
04A, 04B, 04C, 04D, 04E, 04F	Control Equipment Quality Inspections	Manufacturer's Specifications	As Performed (no less than once per month)	N
09	Forming Machine Lubricant	100,000 lb/yr	Daily	Y
01, 03, 04A, 04B, 04C, 04D, 04E, 04F	VE Observation Results	Opacity Limit As Assigned	See PW Condition 8	N

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

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

15. OPACITY

SN	Opacity %	Justification limit, Dept. Guidance, etc) (NSPS	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
01, 03	20	Previous Limit	Daily VE observations
04A, 04B, 04C	10	Previous Limit	VE observations-each loading event
04D, 04E	5	Department Guidance	VE observations-each loading event
04F	5	Department Guidance	Weekly VE observations
05	5	Department Guidance	Inspector's observation
08	5	Department Guidance	Weekly obsrvation

16. DELETED CONDITIONS:

N/A

17. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

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

Permit #
1440-AOP-R1

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

 Thomas Rheume, P.E.