

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1440-AOP-R6 AFIN: 16-00061

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Arkansas Glass Container Corporation  
516 West Johnson  
Jonesboro, Arkansas 72403

3. PERMIT WRITER:

Jesse Smith

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Glass Container Manufacturing  
NAICS Code: 327213

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
12/13/2017	Renewal	Removal of SN-10

6. REVIEWER'S NOTES:

Arkansas Glass Container Corporation owns and operates a glass container manufacturing facility in Jonesboro, Arkansas (Craighead County). This is a renewal of the permit. The surface coating operations (SN-10) have been removed from service and were removed from the permit during this renewal. The insignificant activities list and General Provisions have also been updated. The permitted emission limits were reduced by 7.3 tpy VOC in this renewal.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility was last inspected on March 21, 2017. There were no areas of concern noted at this time.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N  
If yes, were GHG emission increases significant? N

b) Is the facility categorized as a major source for PSD? Y

- *Single pollutant  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

There are no increase of emissions in this permit renewal, only reductions.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Combined Sources	NO <sub>x</sub>	PSD (major source status, not subject to PSD review for this renewal)

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N

If yes, are applicable requirements included and specifically identified in the permit? N  
If not, explain why.

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

Include the results for any ambient air evaluations or modeling. Include NSR/PSD permits and permits that require an evaluation in accordance with revisions to the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

a) Reserved

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H<sub>2</sub>S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H<sub>2</sub>S Standards Y  
 If exempt, explain: No H<sub>2</sub>S emissions

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01&03	PM- Glass Mfg Handbook PM <sub>10</sub> - Stack Test Data NO <sub>x</sub> - Stack Test Data CO- Stack Test Data VOC- Stack Test Data SO <sub>2</sub> - Stack Test Data HAP-AP-42 1.4	PM= 2.5 lb/ton PM <sub>10</sub> = 1.2 lb/ton NO <sub>x</sub> = 9.43 lb/ton CO= 0.86 lb/ton VOC= 1.71 lb/ton SO <sub>2</sub> =2.23 lb/ton	-	-	Uncontrolled Factors
04A	Surrogate AP-42, 11.12-2	PM=0.00099 lb/ton PM <sub>10</sub> = 0.00034 lb/ton	Fabric Sock	90%	Uncontrolled Factors
04B	Surrogate AP-42, 11.12-2	PM=0.00099 lb/ton PM <sub>10</sub> = 0.00034 lb/ton	Fabric Sock	90%	Uncontrolled Factors

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
04C	Surrogate AP-42, 11.12-2	PM=0.00099 lb/ton PM <sub>10</sub> = 0.00034 lb/ton	Fabric Sock	90%	Uncontrolled Factors
04D	Surrogate AP-42, 11.12-2	PM=0.00099 lb/ton PM <sub>10</sub> = 0.00034 lb/ton	Baghouse	99.5%	Uncontrolled Factors
04E	Surrogate AP-42, 11.12-2	PM=0.00099 lb/ton PM <sub>10</sub> = 0.00034 lb/ton	Baghouse	99.5%	Uncontrolled Factors
04F	Surrogate AP-42, 11.6-4	PM=0.0031 lb/ton PM <sub>10</sub> = 0.001 lb/ton	Baghouse	Not used	Controlled
05	AP-42 Natural Gas 1.4-2 1.4-1	<u>Lb/MMSCF</u> PM/PM <sub>10</sub> =7.6 NOx=100 CO=84 VOC=5.5 SO <sub>2</sub> =0.6	-	-	Uncontrolled Factors
08	Surrogate AP-42, 11.6-4	PM=0.0031 lb/ton PM <sub>10</sub> = 0.001 lb/ton	Baghouse	99.5%	Uncontrolled Factors
09	Conservative Estimate	100% Evaporation of volatiles	-	-	-

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01 & 03	PM/PM <sub>10</sub>	5	Five (5) year intervals (each furnace shall be tested every five (5) years).	To help ensure ongoing compliance with criteria emission limits
	SO <sub>2</sub>	6C		
	VOC	25A		
	CO	10		
	NOx	7E		

15. 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)
04A, B, C, D, E, F, 08	Manufacturer's recommended specifications for fabric filters.	Procedure and Inspection	Routine inspection once per month.	N
04A, B, C, D, E, F, 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

#### 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)
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
10	Paint VOC content	2.0 lb/gal	Monthly	N

#### 17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 03	20	Previous Limit	Daily VE observations
04D, 04E	5	Department Guidance	VE observations-each loading event

SN	Opacity	Justification for limit	Compliance Mechanism
04F	5	Department Guidance	Weekly VE observations
05	5	Department Guidance	Inspector's observation
08	5	Department Guidance	Weekly observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
31-33	Removal of SN-10

19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
320 gal Diesel Storage Tank	3	0	0	0.002	0	0	0	0
500 gal Diesel Storage Tank	3	0	0	0.002	0	0	0	0
Cooling Towers	13	4.04	0	0	0	0	0	0
Cullet Jaw Crusher	13	0.0014	0	0	0	0	0	0
Bottle Breaker	13	0.35	0	0	0	0	0	0
Refractory Shaker Screen	13	0.045	0	0	0	0	0	0

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20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1440-AOP-R5





## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 03-11-16

Arkansas Glass Container Corporation  
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\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	754
Permit Type	Renewal No Changes	Permit Fee \$	0

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)	-7.3
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		109.4	109.4	0	0	109.4
PM <sub>10</sub>		53.7	53.7	0		
PM <sub>2.5</sub>		0	0	0		
SO <sub>2</sub>		95.6	95.6	0	0	95.6
VOC		131.6	124.3	-7.3	-7.3	124.3
CO		54.9	54.9	0		
NO <sub>x</sub>		424.7	424.7	0	0	424.7
Hexane	<input type="checkbox"/>	1.9	0	-1.9		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Beryllium	<input type="checkbox"/>	1.28E-05	0.00E+00	-0.0000128		
Total HAPs	<input type="checkbox"/>	0	1.22	1.22		