

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1571-AR-10

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Anchor Packaging - Paragould Facility
2211 North 12th Avenue
Paragould, Arkansas 72450

3. PERMIT WRITER:

Amanda Leamons

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: All Other Plastics Product Manufacturing
NAICS Code: 326199

5. SUBMITTALS: January 9, 2008 and April 21, 2008

6. REVIEWERS NOTES:

Anchor Packaging (owned by a holding company, Hermann Companies, St. Louis, MO) operates a plastic packaging manufacturing facility located at 2211 N. 12th Avenue in Paragould, Arkansas (Greene County). The plant manufactures semi-rigid plastic containers used primarily in the food industry for packaging. This permit revision includes one de minimis modification and one significant modification. The de minimis modification to the permit allows Anchor to install a new Inline Production Line (Inline #67) which consists of an extrusion line and thermoforming line in sequence. The new line will process an additional throughput of 16,573,920 pounds of inline material and 33,288 pounds of product additive, annually. This source will be the 7th production line in the Inline Group and the emissions from the new line will be vented through five stacks (SN-21 through SN-25).

The modification allows the installation of an eighth Inline Production Line (Inline #68) which consists of an extrusion line and thermoforming line in sequence. The total throughput of the inline area will increase to 130,818,811 pounds of inline material and 200,000 pounds of product additive, annually. Furthermore, the facility is no longer manufacturing PVC sheet therefore, emissions of HCl have been eliminated from the permit.

The insignificant activities list has been updated to remove activities no longer present at the facility: Breaker Plate Cleaner and Silo Baghouse have been removed from this permit.

The requested throughput increases from both modifications will result in overall annual permitted emissions increases of 6.3 tons of PM/PM₁₀, 1.9 tons of VOC, 4.6 tons of CO, and 0.3 ton of NO_x and a reduction of 2.51 tons of HCl.

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7. COMPLIANCE STATUS:

There are no outstanding compliance issues or enforcement actions.

8. APPLICABLE REGULATIONS:

- 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

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY

Source	Pollutant	Regulation (NSPS or NESHAP)
None Applicable		

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. 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 deemed 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).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Vinyl Chloride	2.56	0.281	0.22	Yes

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12. CALCULATIONS:

SN	Emission Factor Source	Emission Factor and units (lb/hr per lb of throughput)	Control Equipment Type	Control Equipment Efficiency	Comments
01-03, 11-13, 21-25 & 04, 05, 10, 18, 19	Stack Testing conducted in November 1995	PM/PM ₁₀ – 0.000333 VOC – 0.000198 VC – 0.0000121 CO – 0.000387 NO _x – 0.0000423	None	n/a	Uncontrolled Emission Factor
18, 19	AP-42-6.6.2,	PM/PM ₁₀ – 0.0003g APET/kg storage.	None	n/a	Uncontrolled Emission Factor

13. TESTING REQUIREMENTS:

No testing is required.

14. 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)
None				

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.

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
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SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
Sheetlines	Material Throughput	219,719,194 pounds/yr	Monthly	N
Inlines	Material Throughput	130,818,811 pounds/yr	Monthly	N
Sheetline Additives	Material Throughput	140,664 pounds/yr	Monthly	N
Inline Additives	Material Throughput	200,000 pounds/yr	Monthly	N
Sheetline (SL11)	Material Throughput	35,040,000	Monthly	N
Inline #67	Inline Materials	16,573,920 pounds/yr	Monthly	N
Inline #67	Inline Product Additive	33,288 pounds/yr	Monthly	N

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

OPACITY:

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily/ weekly observation, control equipment operation, etc)
01-05, 10-13, 18, 19, 21-25	20	Department Guidance & 19.501	n/a

17. DELETED CONDITIONS:

The previous permit contained the following deleted Specific Conditions (SC).

Former SC	Justification for Removal
10	PVC sheet is no longer produced at the facility

18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

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

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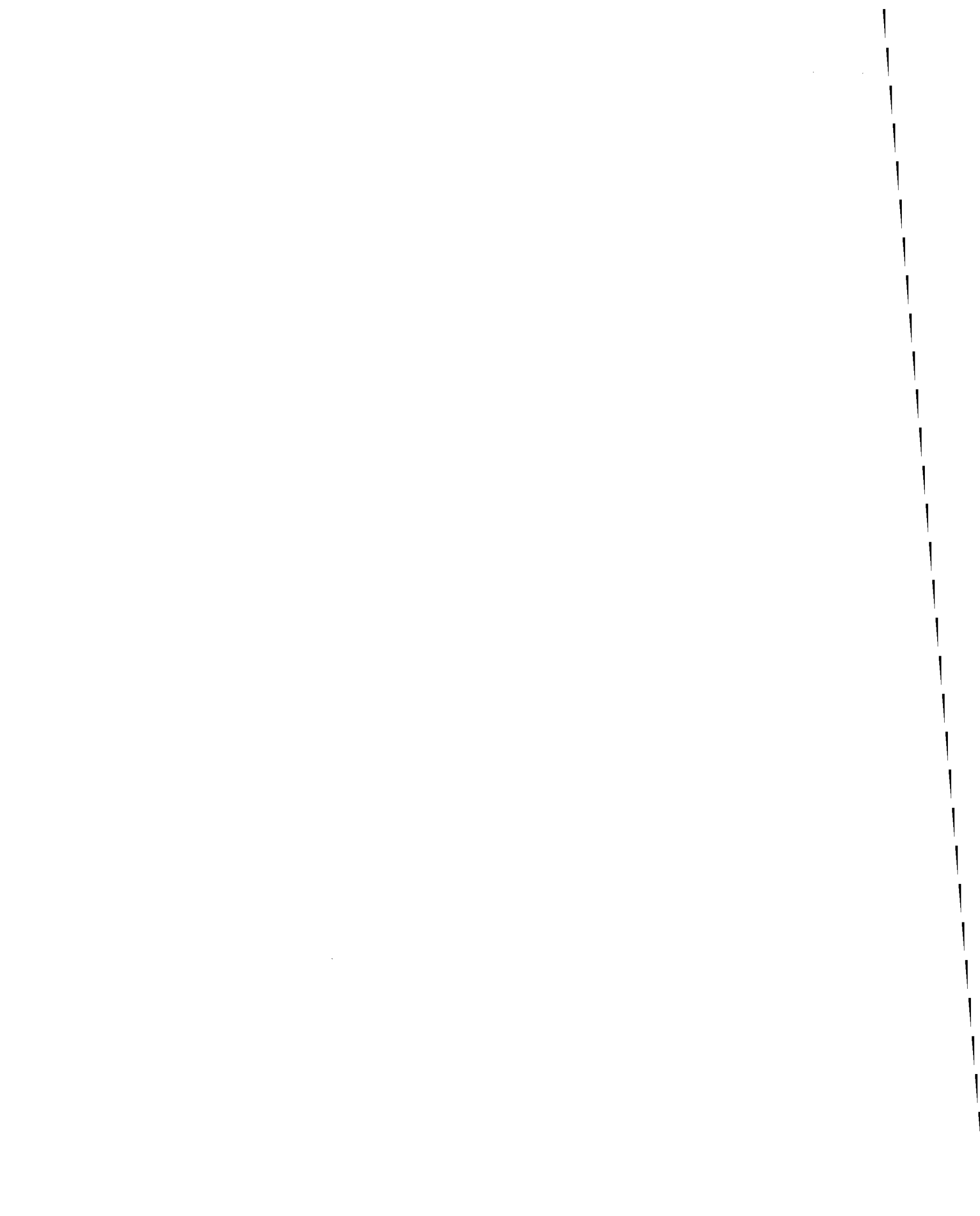
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19. CONCURRENCE BY:

The following Supervisor concurs with the permitting decision:

Karen Cerney, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION



Fee Calculation for Minor Source

Facility Name: Anchor Packaging
 Permit Number: 107-0010
 APIN: 23-0010

\$/ton factor: 20.96
 Minimum Fee \$: 400
 Minimum Initial Fee \$: 500
 Check if Administrative Amendment:

Permit Predominant Air Contaminant:
 Net Chargeable Emission Increase:
 Permit Modification Fee \$:
 Initial Permit Fee \$:
 Annual TPY Chargeable Emissions:

Old Permit	New Permit
400	
0	
54	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	47.7	54	6.3
PM ₁₀	47.7	54	6.3
SO ₂	0	0	0
VOC	27.9	29.8	1.9
CO	55.1	59.7	4.6
NO _x	6.4	6.7	0.3
Vinyl chloride	0.96	0.96	0
HCl	2.51	0	-2.51

