

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1571-AR-12 AFIN: 28-00101

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Hermann Companies, Inc. d/b/a Anchor Packaging
Division of Hermann Companies, Inc.
2211 North 12th Avenue
Paragould, Arkansas 72450

3. PERMIT WRITER:

Elliott Marshall

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Plastics Material and Resin Manufacturing
NAICS Code: 325211

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
3/2/2018	Administrative Amendment	N/A

6. REVIEWER'S NOTES:

Anchor Packaging, Inc. (Anchor Packaging) owns and operates a plastic packaging manufacturing facility at 2211 North 12th Avenue, Paragould, Greene County. The plant manufactures semi-rigid plastic containers used primarily in the food industry for packaging. This permitting action is to install an electric breaker plate cleaning oven to the facility's A-13 Insignificant Activities list.

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 active/pending enforcement actions.

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? N

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

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

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
N/A		

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

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

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

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

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
N/A		

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:

The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

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/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

No modeling was performed for this permit revision.

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Vinyl Chloride	2.56	0.28	0.5	N

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Vinyl Chloride	25.56	4.32	Y

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, 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

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

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)
N/A				

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)
Sheetlines	Material Throughput	175,686,194 lbs/yr	Monthly	N
Sheetline Additives	Material Throughput	140,664 lbs/yr	Monthly	N
Sheetline (SL11)	Material Throughput	35,040,000 lbs/yr	Monthly	N
Inlines	Material Throughput	263,410,171 lbs/yr	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
Inline Additives	Material Throughput	200,000 lbs/yr	Monthly	N
Inline #76 & 76	Material Throughput	33,147,840 lbs/yr	Monthly	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01-05, 10-13, 18, 19, 21-25, 30-41	20%	Regulation 19.501	N/A

18. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

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)						HAPs	
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	Single	Total	
Three (3) Parts washers	A-13								
Breaker Plate Cleaning Oven	A-13	<0.01							

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 #
1571-AR-11

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Hermann Companies,
 Inc. d/b/a Anchor Packaging Division
 of Hermann Companies, Inc.
 Permit Number:#1571-AR-12
 AFIN: 28-00101

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	70.3	70.3
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input checked="" type="checkbox"/>	Permit Fee \$	0	
		Annual Chargeable Emissions (tpy)	70.3	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	70.3	70.3	0
PM ₁₀	70.3	70.3	0
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	39.9	39.9	0
CO	78.2	78.2	0
NO _x	8.5	8.5	0
Vinyl Chloride	2.4	2.4	0