

## STATEMENT OF BASIS

*for the issuance of Draft Air Permit # 1571-AR-6*

**1. PERMITTING AUTHORITY:**

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

**2. APPLICANT:**

Anchor Packaging - Paragould Facility  
2211 N. 12<sup>th</sup> Avenue  
Paragould, Arkansas 72450

**3. PERMIT WRITER:**

Lloyd Davis

**4. PROCESS DESCRIPTION AND SIC CODE:**

SIC Description: Plastic products, NEC  
SIC Code: 3089

**5. SUBMITTALS:** September 6, 2001

**6. REVIEWER'S NOTES:**

Emissions will drop drastically when the Blown Film Department is transferred to the Marmaduke facility. Three new Inline machines will be added in the available space.

**7. COMPLIANCE STATUS:** The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues

The facility is in compliance with the permit requirements.

**8. APPLICABLE REGULATIONS:**

**A. Applicability**

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera) (Y/N)   N  

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Has this facility underwent PSD review in the past (Y/N)  N  Permit # \_\_\_\_\_  
 Is this facility categorized as a major source for PSD? (Y/N)  N   
 \$ 100 tpy and on the list of 28 (100 tpy)? (Y/N)  N   
 \$ 250 tpy all other (Y/N)  N

**B. PSD Netting**

Was netting performed to avoid PSD review in this permit? (Y/N)  N

**C. Source and Pollutant Specific Regulatory Applicability**

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
NSPS, NESHAP, and PSD do not apply to this facility.		

**9. EMISSION CHANGES:**

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

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 1571-AR-5	Air Permit 1571-AR-6	Change
PM/PM <sub>10</sub>	46.0	41.05	-4.95
SO <sub>2</sub>	0	0	0
VOC	24.2	24.79	0.59
CO	47.0	50.41	3.41
NO <sub>x</sub>	5.6	5.51	-0.09
Vinyl Chloride	1.04	0.96	-0.08
HCl	2.51	2.51	0

**10. 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.

**11. MODELING: Non-Criteria Pollutants**

This permit does not contain a TLV table for non-criteria pollutants. There is no increase in HAP emissions.

**1st Tier Screening (PAER)**

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The PAER was deemed by the Department to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11*TLV	Proposed lb/hr	Pass?
HCl	7.46	0.8206	0.57	Yes
Vinyl Chloride	2.56	0.2816	0.22	Yes

**12. CALCULATIONS:**

SN	Pollutant	Emission Factor Source (AP-42, Testing, etc)	Control Equipment Type
1-3, 11-13	PM/PM <sub>10</sub> VOC CO NO <sub>x</sub> Vinyl Chloride	All emissions for these sources were based upon tests conducted at this facility.	None

SN	Pollutant	Emission Factor Source (AP-42, Testing, etc)	Control Equipment Type
4, 5, 10, 18, and 19	PM/PM <sub>10</sub> VOC CO NO <sub>x</sub> Vinyl Chloride HCl	All emissions for these sources were based upon tests conducted at this facility.	None

**13. TESTING REQUIREMENTS:**

This permit does not require stack testing of any of the sources.

**14. MONITORING OR CEMS**

This permit does not contain any monitoring requirements.

**12. 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	Frequency *	Report (Y/N)**
Facility	Blown Film Line Materials	1,437.5 tons/month	Monthly	N
Facility	Sheetline Throughput	184,983,194 lbs per 12 Consecutive Months	Monthly	N
Facility	Inline Materials	76,042,901 lbs per 12 Consecutive Months	Monthly	N
Facility	Hydrogen Chloride Emissions	2.6 tons/lbs per 12 Consecutive Months	Monthly	N

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

**13. OPACITY**

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
1 - 5 10 - 13 18 - 19	20	Carried over from previous permits	Inspection
6	5	Carried over from previous permits	Inspection

**14. DELETED CONDITIONS:**

The following Specific Conditions were included in the previous permit, but deleted for the current permitting action.

Former SC	Justification for removal
No specific conditions have been deleted from the previous permit.	

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**15. VOIDED, SUPERSEDED OR SUBSUMED PERMITS**

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

<b>Permit #</b>
1571-AR-5

**16. CONCURRENCE BY:**

The following supervisor concurs with the permitting decision:

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*Thomas Rheaume, P.E.*