

# ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1571-AR-6

IS ISSUED TO:

Anchor Packaging - Paragould Facility  
2211 N. 12<sup>th</sup> Avenue  
Paragould, AR 72450  
Greene County  
CSN: 28-0101

THIS PERMIT IS YOUR AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND YOUR APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 ET SEQ.) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Keith A. Michaels

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Date

**SECTION I: FACILITY INFORMATION**

PERMITTEE: Anchor Packaging - Paragould Facility  
CSN: 28-0101  
PERMIT NUMBER: 1571-AR-6

FACILITY ADDRESS: 2211 N. 12<sup>th</sup> Avenue  
Paragould, AR 72450

COUNTY: Greene

CONTACT POSITION: Mr. Rick Glickert, Plant Engineer  
TELEPHONE NUMBER: (870) 236-2262  
FAX NUMBER: (870) 236-4143

REVIEWING ENGINEER: M. Lloyd Davis, P. E.

UTM North-South (Y): Zone 15 [3996.741 km]  
UTM East-West (X): Zone 15 [728.166 km]

**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

## **SECTION II: INTRODUCTION**

### **Summary**

Anchor Packaging (owned by a holding company, Hermann Co., St. Louis, MO) operates a plastic packaging manufacturing facility located at 2211 N. 12th Avenue in Paragould, Arkansas (Greene County). The plant has about 345 employees at the Paragould location, and manufactures semi-rigid plastic containers used primarily in the food industry for packaging (e.g. - sandwich holders) - SIC 3089.

Anchor Packaging is installing three new inline extruders at this facility, and moving its blown film operation to the Marmaduke facility. No blown film production will remain after March 1, 2002.

The Railcar Unloader will be moved to Marmaduke, and is deleted from this permit. New re-grind bag filters on the three new inline extruders will be classified as insignificant sources, along with the existing bagline filter on the existing inline extruder regrind, for a total of four regrind filters.

### **Process Description**

#### **1. Sheetline (SL) and Thermoforming (TF) - SN-04, 05, 10, 18, and 19.**

The seven extrusion lines operate 24 hours a day, 7 days a week, and produce large rolls of different widths and thickness (e.g., 30 inches wide by 0.04 inches thick) of semi-rigid plastic sheet stock of various compounds, plus a pelletizer machine that reduces scrap to small bead form for reprocessing and reduced storage space. The sheetline products are stored and later used by the thermoforming process. Some sheetline machines have one extruder and produce a monolayer product, while other sheetline machines have multiple extruders and can produce multilayer product sheet. Associated with this department is a small laminator used to layer multiple sheets before processing through a thermoformer.

There are 20 forming lines that produce a multitude of various sized and shaped containers. The products are stacked and packed into corrugated boxes for shipment. Emissions are vented through ceiling fans without controls.

**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

**2. Inline (IL) - SN-01, 02, 03, 11, 12, 13**

An Inline machine is essentially a sheetline and a thermoformer tied together for a continuous process. Some Inline machines have a single extruder, and some have multiple extruders. They operate 24 hours a day, 7 days a week. Emissions are vented through ceiling fans without controls.

**3. Emissions from Storage Tanks - SN-06**

Fourteen exterior silos are used for material storage. They are loaded with top mounted vacuum receivers, and do not require filtration. There is a baghouse ( SN-06) on one silo. This silo had been used to contain powdered PVC compound, but is now used with beaded PVC, and is not actually necessary.

Two above ground tanks are located near the silos, but are no longer used, and may eventually be removed.

**Regulations**

The facility is subject to regulations under *the Arkansas Air Pollution Control Code* (Air Code) and *the Arkansas Plan of Implementation for Air Pollution Control* (SIP).

The following table is a summary of the facility's total emissions.

<b>TOTAL ALLOWABLE EMISSIONS</b>		
<b>Pollutant</b>	<b>Emission Rates</b>	
	<b>lb/hr</b>	<b>tpy</b>
PM	9.37	41.05
PM <sub>10</sub>	9.37	41.05
VOC	5.66	24.79
CO	11.51	50.41
NO <sub>x</sub>	1.26	5.51
Vinyl Chloride	0.22	0.96
HCl	0.57	2.51

**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

### **SECTION III: PERMIT HISTORY**

Permit #1571-A was the first permit issued to Anchor Packaging's Paragould facility.

Permit #1571-AR-1 was issued on September 9, 1996, to document the vinyl chloride emissions and to base the emission rates on the permitted throughput.

Permit#1571-AR-2 was issued on February 11, 1998. This permit documented the addition of a new blown film line, a new railcar unloading machine, and additional blown film mixer, and a new ESO tank. The throughput limits in the specific conditions were also corrected.

Permit #1571-AR-3 was issued on December 9, 1999. This permit allowed for the replacement of a sheetline extruder machine, modification of an existing extruder machine, addition of a minor product additive to some sheetline products, and the addition of two exterior silos and a railcar unloader. At a later date, the permittee decided not to install the railcar unloader as allowed under permit #1571-AR-3.

Permit #1571-AR-4 was issued on June 2, 2000. This permit allowed the following:

1. Addition of a new extrusion line;
2. Modification of an existing extrusion line;
3. Addition of a railcar unloader and silo which will process plastic pellets;
4. Addition of 2 regrind dryers; and
5. Laminator with no associated emissions.

Permit #1571-AR-5 was issued on March 8, 2001. This permit allowed the following:

1. A new thermoformer, trim press, and scrap grinder with insignificant emissions;
2. Addition of a railcar unloader, silo, and materials handling system which process plastic pellets and are also insignificant activities;
3. An additional extruder sheetline;
4. An additional Safety Kleen Parts Washer;
5. An increase in permitted emissions to accommodate business growth;
6. No new raw materials were used at the facility; however, the permit throughput limits were increased over those in Permit # 1571-AR-4.

**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

**SECTION IV: EMISSION UNIT INFORMATION**

**Specific Conditions**

- Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
01	Inline Process Area	PM <sub>10</sub>	0.52	2.29
		VOC	0.29	1.25
		CO	0.56	2.45
		NO <sub>x</sub>	0.06	0.27
02	Inline Process Area	PM <sub>10</sub>	0.52	2.29
		VOC	0.29	1.25
		CO	0.56	2.45
		NO <sub>x</sub>	0.06	0.27
03	Inline Process Area	PM <sub>10</sub>	0.52	2.29
		VOC	0.29	1.25
		CO	0.56	2.45
		NO <sub>x</sub>	0.06	0.27
04	Sheetline and Thermoforming	PM <sub>10</sub>	1.23	5.39
		VOC	0.79	3.45
		CO	1.63	7.14
		NO <sub>x</sub>	0.18	0.78
05	Sheetline and Thermoforming	PM <sub>10</sub>	1.23	5.39
		VOC	0.79	3.45
		CO	1.63	7.14
		NO <sub>x</sub>	0.18	0.78
06	RPVC Silo Baghouse	PM <sub>10</sub>	0.084	0.368

**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
10	Sheetline and Thermoforming	PM <sub>10</sub>	1.23	5.39
		VOC	0.79	3.45
		CO	1.63	7.14
		NO <sub>x</sub>	0.18	0.78
11	Inline Process Area	PM <sub>10</sub>	0.52	2.29
		VOC	0.29	1.25
		CO	0.56	2.45
		NO <sub>x</sub>	0.06	0.27
12	Inline Process Area	PM <sub>10</sub>	0.52	2.29
		VOC	0.29	1.25
		CO	0.56	2.45
		NO <sub>x</sub>	0.06	0.27
13	Inline Process Area	PM <sub>10</sub>	0.52	2.29
		VOC	0.29	1.25
		CO	0.56	2.45
		NO <sub>x</sub>	0.06	0.27
18	Sheetline and Thermoforming	PM <sub>10</sub>	1.23	5.39
		VOC	0.79	3.45
		CO	1.63	7.14
		NO <sub>x</sub>	0.18	0.78
19	Sheetline and Thermoforming	PM <sub>10</sub>	1.23	5.39
		VOC	0.79	3.45
		CO	1.63	7.14
		NO <sub>x</sub>	0.18	0.78

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
01	Inline Process Area	PM	0.52	2.29
02	Inline Process Area	PM	0.52	2.29
03	Inline Process Area	PM	0.52	2.29
04	Sheetline and Thermoforming	PM Vinyl Chloride HCl	1.23 0.04 0.11	5.39 0.19 0.50
05	Sheetline and Thermoforming	PM Vinyl Chloride HCl	1.23 0.04 0.11	5.39 0.19 0.50
06	RPVC Silo Baghouse	PM	0.084	0.37
10	Sheetline and Thermoforming	PM Vinyl Chloride HCl	1.23 0.04 0.11	5.39 0.19 0.50
11	Inline Process Area	PM	0.52	2.29
12	Inline Process Area	PM	0.52	2.29
13	Inline Process Area	PM	0.52	2.29
18	Sheetline and Thermoforming	PM Vinyl Chloride HCl	1.23 0.04 0.11	5.39 0.19 0.50
19	Sheetline and Thermoforming	PM Vinyl Chloride HCl	1.23 0.04 0.11	5.39 0.19 0.50



**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

3. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

<b>SN</b>	<b>Limit</b>	<b>Regulatory Citation</b>
01, 02, 03, 04, 05, 10, 11, 12, 13, 18, 19	20%	19.501
06	5%	18.501

4. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.
5. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.
6. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 76,042,901 pounds of Inline materials and 184,983,194 pounds of Sheetline materials at the facility per consecutive 12 month period.
7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition # 6. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.
8. Pursuant to § 18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of sheetline PVC throughput for calculating the HCl emissions, based on an emission factor of 0.000118 lb HCl/lb of sheetline PVC, in order to demonstrate compliance with the tpy limit set forth in Specific Condition #2 and

**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

which may be used by the Department for enforcement purposes. These records shall be updated no later than the fifteenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request.

9. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee may process alternative raw materials for product development and/or improvement under the following conditions:
  - a. Anchor Packaging shall not test more than 20 tons of any specific raw material without notifying the Department within 10 working days.
  - b. All alternative raw materials being tested must have the following information on site and ready to be made available to Department personnel upon request: dates of testing period, name and MSDS of material(s), name and telephone number of project manager, and process and machine of where the test was performed.
  - c. Before any new plastics are put into production they must be tested to verify that it meets all permit limits and that no new HAP's are produced. If new HAP's are emitted or if existing permitted HAP limits increase, the permittee must apply for a new permit.
10. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 1,437.5 tons per month of Blown Film materials at the facility during the transition period before the Blown Film machines are transferred to the Marmaduke facility.
11. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records during the interim period before the Blown Film machines are transferred to the Marmaduke facility which demonstrate compliance with Specific Condition #10. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.

**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

**SECTION V: INSIGNIFICANT ACTIVITIES**

The following types of activities or emissions are deemed insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in applications dated **October 24, 2000 and August 29, 2001.**

<b>Description</b>	<b>Category</b>
Three (3) Parts Washers	A-1
Breaker Plate Cleaner	A-1
New regrind bag filters on the four Inline Extruders	A-1

**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

## **SECTION VI: GENERAL CONDITIONS**

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, records must be kept for five years which will enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

6. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
Post Office Box 8913  
Little Rock, AR 72219

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
  - a. Sampling ports adequate for applicable test methods
  - b. Safe sampling platforms
  - c. Safe access to sampling platforms
  - d. Utilities for sampling and testing equipment
9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

**Anchor Packaging - Paragould Facility**  
**Permit #: 1571-AR-6**  
**CSN: 28-0101**

10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met:
  - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and that all reasonable measures have been taken to immediately minimize or eliminate the excess emissions.
  - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
  - c. The permittee shall submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, it need not be submitted again.
  
11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
  - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit
  - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act
  - c. To inspect any monitoring equipment or monitoring method required in this permit
  - d. To sample any emission of pollutants
  - e. To perform an operation and maintenance inspection of the permitted source

12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus.
13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.

# INVOICE REQUEST FORM

PDS-\_\_\_\_\_

Date December 19, 2001

<input checked="" type="checkbox"/>	Air
<input type="checkbox"/>	NPDES
<input type="checkbox"/>	Stormwater
<input type="checkbox"/>	State Permits Branch
<input type="checkbox"/>	Solid Waste

CSN 28-0101

Facility Name Anchor Packaging - Paragould Facility

Invoice Mailing Address 2211 N. 12<sup>th</sup> Avenue, Paragould AR 72450

<input type="checkbox"/>	Initial
<input checked="" type="checkbox"/>	Modification
<input type="checkbox"/>	Annual

Permit Number 1571-AR-6

Permit Description Minor Source

Permit Fee Code A

Amount Due \$ 400 Minimum Fee

Engineer Lloyd Davis

Paid? XGNo GYes Check # \_\_\_\_\_

Comments: **Air Permit Fee Calculation:** Reduction in emission rates



## Public Notice

Pursuant to A.C.A. §8-4-203, and the regulations promulgated thereunder, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Anchor Packaging (owned by a holding company, Hermann Co., St. Louis, MO) operates a plastic packaging manufacturing facility located at 2211 N. 12th Avenue in Paragould, Arkansas - CSN:28-0101 (Greene County). The plant has about 345 employees at the Paragould location, and manufactures semi-rigid plastic containers used primarily in the food industry for packaging - SIC 3089. Anchor Packaging is installing three new Inline extruders at this facility, and moving its Blown Film Operation to the Marmaduke facility. Particulate emission limits will be lowered from 46 tpy to 41 tpy.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Suzanne Carswell, Information Officer. Citizens desiring technical information concerning the application or permit should contact Lloyd Davis, Engineer. Both Suzanne Carswell and Lloyd Davis can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Crowley Ridge Regional Library, 315 West Oak, Jonesboro, AR 72401. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Suzanne Carswell. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8).

Dated this

Richard A. Weiss  
Interim Director

## RESPONSE TO COMMENTS

### Anchor Packaging - Paragould Facility PERMIT #1571-AR-6 CSN: 28-0101

On October 11, 2001, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, only Anchor Packaging submitted a written comment on the draft permitting decision. The Department's response to these issues follows:

#### **Issue #1:**

Section II: Introduction, Summary, last paragraph: The last sentence indicates that there are three new re-grind bag filters on the new inline extruders. This is accurate, but there is also an existing bag filter on the existing inline extruder regrind for a total of four regrind filters.

#### **Response #1:**

**Accepted.** The last sentence in the referenced paragraph now reads as follows:

“New re-grind bag filters on the three new inline extruders will be classified as insignificant sources, along with the existing bagline filter on the existing inline extruder regrind, for a total of four regrind filters.”

#### **Issue #2:**

Section II: Introduction, Process Description, paragraph 3, Emissions from Storage Tanks: The Draft permit indicates that there is a baghouse (SN-06) on one silo, and only four exterior silos for material storage. There are actually fourteen material silos with no emissions, since they are loaded with top mounted vacuum receivers. SN-06 is correctly noted as being located on a silo formerly used to contain powdered PVC. This source now handles only beaded PVC, and the baghouse is not necessary.

#### **Response #2:**

**Accepted.** The last sentence in the referenced paragraph now reads as follows:

“Fourteen exterior silos are used for material storage. They are loaded with top mounted vacuum receivers, and do not require filtration. There is a baghouse ( SN-06) on one silo. This silo had been used to contain powdered PVC compound, but is now used with beaded PVC, and is not actually necessary.”

**Issue #3:**

Section IV: Specific Conditions # 8: Anchor Packaging has no monitoring capability for HCl emissions, which are based on past stack testing and material throughput. Anchor will comply with Specific Condition #8 by keeping records of material throughput and calculating the HCl emission based on an emissions factor of 0.000118 lb/lb of sheetline PVC.

**Response #3:**

**Accepted.** Specific Conditions # 8 has been revised accordingly.

**Issue #4:**

Section V: Insignificant Activities: There are actually four regrind bag filters associated with the four Inline Extruders.

**Response #4:**

**Accepted.** This item now reads as follows: “New regrind bag filters on the four Inline Extruders”