

## STATEMENT OF BASIS

for the issuance of Draft Air Permit # **1571-AR-7**:

**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 North 12<sup>th</sup>. Avenue  
Paragould, Arkansas 72450

**3. PERMIT WRITER:** Patty Campbell

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

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

**5. SUBMITTALS:** July 5, 2005

**6. REVIEWER'S NOTES:**

This permit is being modified to allow Anchor Packaging to add one (1) thermoformer/extruder inline machine, thus operating a total of five (5) inline machines (SN-01-03, 11-13). Inline material throughput will be increased from 76,042,901 to 77,642,901 pounds per year. Emissions have increased by the following: +1.2 tons/yr PM<sub>10</sub>, +0.2 tons/yr VOC, and +0.3 tons/yr CO. The blown film extruders have been physically removed from the Paragould facility. Anchor Packaging intends to discontinue the use of a baghouse (SN-06) on an exterior silo because PVC is no longer being received in powdered form. With this permit Specific Conditions #1 and #2 are grouped with common emission sources, one for the inline process area (SN-01-03, 11-13) and another for the extrusion sheetline/thermoforming process area (SN-04, 05, 10, 18, 19).

**7. COMPLIANCE STATUS:**

There are no outstanding compliance issues or enforcement actions.

**8. APPLICABLE REGULATIONS:**

**PSD Applicability**

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera)?	Y/N	No
Has this facility undergone PSD review in the past?	Y/N	No
Is this facility categorized as a major source for PSD?	Y/N	No
≥ 100 tpy and on the list of 28 (100 tpy)?	Y/N	No
≥ 250 tpy all other?	Y/N	No

**PSD Netting**

Was netting performed to avoid PSD review in this permit? Y/N No

**Source and Pollutant Specific Regulatory Applicability**

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

**9. EMISSION CHANGES:**

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

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 1571-AR-6	Air Permit 1571-AR-7	Change
PM/PM <sub>10</sub>	41.1	42.3	+1.2
VOC	24.8	25.0	+0.2
CO	50.5	50.8	+0.3
NO <sub>x</sub>	5.6	5.6	0
VC	1.0	1.0	0
HCl	2.6	2.6	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. NON-CRITERIA POLLUTANTS**

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLVs) that pass the *PAER or PAIL*. Therefore, modeling of specific non-criteria pollutants was not performed.

**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/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?
Vinyl Chloride	2.56	0.281	0.22	Yes
HCl	2.99	0.329	0.57	No

**2nd Tier Screening (PAIL)**

SCREEN3 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 was 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?
HCl	29.9	29.62	Yes

**12. CALCULATIONS:**

SN	Emission Factor Source	Emission Factor and units (lb/hr per lb of throughput)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled)
01-03, 11-13	Stack Testing conducted in November 1995	PM/PM <sub>10</sub> – 0.000333 VOC – 0.000198 VC – 0.0000121 CO – 0.000387 NO <sub>x</sub> – 0.0000423	None	n/a	Uncontrolled Emission Factor

**13. TESTING REQUIREMENTS:**

No testing is required.

**14. 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)**
Sheetlines	Material Throughput	184,679,194 pounds/yr	Monthly	N
Inlines	Material Throughput	77,642,901 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

15. **OPACITY**

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

16. **DELETED CONDITIONS:**

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

Former SC	Justification for Removal
#2	RPVC Silo Baghouse (SN-06) has been deleted from this condition because PVC is no longer being received in powdered form.
#10	Blown film extruders have been physically removed from the Paragould facility.
#11	Blown film extruders have been physically removed from the Paragould facility.

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

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

Permit #
1571-AR-6

18. **CONCURRENCE BY:**

The following Supervisor concurs with the permitting decision:

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David Triplett, P.E.  
 Engineer Supervisor