

# ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1571-AR-7

IS ISSUED TO:

Anchor Packaging - Paragould Facility  
2211 North 12th Avenue  
Paragould, Arkansas 72450  
Greene County  
AFIN: 28-00101

THIS PERMIT IS Anchor Packaging - Paragould Facility's 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 THE 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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Michael Bonds  
Chief, Air Division

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Date November 16, 2005

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**Section I: FACILITY INFORMATION**

PERMITTEE: Anchor Packaging - Paragould Facility

AFIN: 28-00101

PERMIT NUMBER: 1571-AR-7

FACILITY ADDRESS: 2211 North 12<sup>th</sup>. Avenue  
Paragould, Arkansas 72450

COUNTY: Greene County

CONTACT PERSON: Rick Glickert

CONTACT POSITION Plant Engineer

TELEPHONE NUMBER: 870-236-2262

REVIEWING ENGINEER: Patty Campbell

UTM Zone 15

UTM North-South (Y): 3996.741 km N

UTM East-West (X): 728.166 km E

## **Section II: INTRODUCTION**

### **Summary**

Anchor Packaging (owned by a holding company, Hermann Companies, St. Louis, MO) operates a plastic packaging manufacturing facility located at 2211 N. 12<sup>th</sup>. Avenue in Paragould, Arkansas (Greene County). The plant manufactures semi-rigid plastic containers used primarily in the food industry for packaging. 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. Inline material throughput will be increased from 76,042,901 pounds/yr to 77,642,901 pounds per year. Total facility emissions will be permitted at: 42.3 tons/yr PM/PM<sub>10</sub>, 25.0 tons/yr VOCs, 0.96 tons/yr Vinyl Chloride, 50.8 tons/yr CO, 5.6 tons/yr NO<sub>x</sub> and 2.6 tons/yr HCl. 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).

### **Process Description**

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

The seven (7) extrusion sheetlines (SN-04, 05, 10, 18, and 19) operate 24 hours a day, 7 days a week, and produce large rolls of different widths and thicknesses (e.g., 30 inches wide by 0.04 inches thick) of semi-rigid plastic sheet stock of various compounds (PP, PS, PVC and RPVC). Some sheetline machines have one extruder and produce a monolayer product sheet, while other sheetline machines have multiple extruders and can produce multilayer product sheet. There is one pelletizer machine that reduces plastic scrap to small bead form for reprocessing. Associated with this department is a small laminator used to layer multiple sheets before processing through a thermoformer.

The sheetline products (rolls) are stored for later use by the thermoforming process. There are twenty (20) thermoforming lines that produce a multitude of various sized and shaped containers. The containers are stacked and packed into corrugated boxes for shipment. Emissions are vented through five (5) ceiling-and wall mounted exhaust fans without controls and without ductwork. No changes are being made to the sheetline extruders and thermoforming processes.

#### **Inline (IL) Machines - SN-01, 02, 03, 11, 12, and 13.**

With the addition of the new machine, a total of five (5) inline machines (SN-01-03, 11-13) will operate 24 hours a day, 7 days a week. An inline machine is essentially an extrusion sheetline and a thermoformer tied together for a continuous process, i.e., the sheetline stock is converted to containers immediately upon forming. Some Inline machines have a single extruder, and some have multiple extruders. Emissions are vented through six (6) ceiling-or wall mounted exhaust fans without controls and without ductwork.

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### Regulations

Source No.	Regulation Citations
Facility	Regulation #18, Arkansas Air Pollution Control Code, effective February 15, 1999
Facility	Regulation #19, Arkansas Plan of Implementation for Air Pollution Control, effective December 19, 2004

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

**Table 1 - Total Allowable Emissions**

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM/PM <sub>10</sub>	9.7	42.3
VOC	5.7	25.0
CO	11.6	50.8
NO <sub>x</sub>	1.3	5.6
Vinyl Chloride	0.22	0.96
HCl	0.57	2.51

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### **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 modifications:

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 modifications:

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; and
6. No new raw materials were used at the facility; however, the permit throughput limits were increased over those in Permit # 1571-AR-4.

Permit #1571-AR-6 was issued on December 3, 2001. This facility's total emission limits were permitted at: 41.05 tons/yr PM/PM<sub>10</sub>, 24.79 tons/yr VOC, 50.41 tons/yr CO, 5.51 tons/yr NO<sub>x</sub>, 0.96 tons/yr Vinyl Chloride, and 2.51 tons/yr HCl. This permit allowed the following modifications:

1. Addition of three (3) inline thermoformer/extruders;
2. Regrind bag filters were classified as Insignificant Activities;
3. All blown film extruders were removed from the facility;
4. The railcar unloader was removed from the facility; and
5. Three (3) Safety Kleen Parts Washers (formerly SN-20) were classified as Insignificant Activities.

**Section IV: EMISSION UNIT INFORMATION**

**Specific Conditions**

1. The permittee will not exceed the emission rates set forth in the following table. [§19.501 *et seq.* of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective December 19, 2004, (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 2 - Criteria Pollutants**

SN	Description	Pollutant	lb/hr	tpy
01-03, 11- 13	Inline Process Area, 5 Machines & 6 Stacks	PM <sub>10</sub>	3.4	15.0
		VOC	1.8	7.7
		CO	3.5	15.0
		NO <sub>x</sub>	0.4	1.7
04, 05, 10, 18, 19	Sheetline and Thermoforming, 7 Sheetlines and 5 stacks	PM <sub>10</sub>	6.2	27.0
		VOC	4.0	17.3
		CO	8.2	35.8
		NO <sub>x</sub>	0.9	3.9

2. The permittee will not exceed the emission rates set forth in the following table. [§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]

**Table 3 - Non-Criteria Pollutants**

SN	Description	Pollutant	lb/hr	tpy
01-03, 11-13	Inline Process Area, 5 Machines & 6 Stacks	PM	3.40	15.0
04, 05, 10, 18, 19	Sheetline and Thermoforming, 7 Sheetlines and 5 stacks	PM	6.2	27.0
		Vinyl Chloride	0.22	0.96
		HCl	0.57	2.51

3. Visible emissions will not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Table 4 - Visible Emissions**

SN	Limit	Regulatory Citation
01-05,10-13, 18, 19	20%	19.501

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4. The permittee will 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. [§18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]
5. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

**Plant-wide Conditions**

6. The permittee will not process more than 77,642,901 pounds of inline materials and 184,679,194 pounds of sheetline materials at the facility per consecutive 12-month period. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
7. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #6. The permittee will maintain a twelve month rolling total and each individual month's data on-site and make available to Department personnel upon request. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee will 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 which may be used by the Department for enforcement purposes. These records will be updated no later than the fifteenth day of the month following the month which the records represent, will be kept on site, and will be made available to Department personnel upon request. [§ 18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
9. The permittee may process alternative raw materials for product development and/or improvement under the following conditions: [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
  - a. Anchor Packaging will 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 where the test was performed.
  - c. Before any new plastics are put into production they must be tested to verify that they meet 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 permit modification.



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### **Section V: INSIGNIFICANT ACTIVITIES**

The Department deems the following types of activities or emissions as 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 an application dated **July 5, 2005**.

**Table 5 - Insignificant Activities**

<b>Description</b>	<b>Category</b>
Three (3) Safety Kleen Parts Washers (formerly SN-20)	A-1
Breaker Plate Cleaner	A-1
Regrind Bag Filters, located in Inline Area	A-1
Silo Baghouse (formerly SN-06)	A-13

**Section VI: GENERAL CONDITIONS**

1. Any terms or conditions included in this permit that 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 that 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. This permit does 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 under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [§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]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [§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]
5. The permittee must keep records for five years to 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 Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [§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]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [§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]

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

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [§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]
8. The permittee will provide: [§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]
  - 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. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [§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]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will 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: [§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]
  - 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 the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
  - b. The permittee reports the occurrence or upset or breakdown of equipment (by

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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 must 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, the information need not be submitted again.
11. The permittee will allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - 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; and
  - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit 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. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [§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]
14. This permit may be transferred. An applicant for a transfer must 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. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [§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

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§8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]