

8/1/07
10/9/07

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1571-AR-9

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 12th Avenue
Paragould, Arkansas 72450

3. PERMIT WRITER: Jim Siganos, P.E.

4. PROCESS DESCRIPTION AND NAICS CODE:

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

5. SUBMITTALS: April 4, 2007

6. REVIEWERS NOTES:

Anchor Packaging of Paragould operates a manufacturing facility which produces semi-rigid plastic containers used primarily in the food industry for packaging. This permit is being modified to allow Anchor to install an 8th Extrusion Line (Sheetline - SL11), which will use amorphous polyethylene terephthalate (APET) and reducing the use of PVC. Installation of this Sheetline (SL11) includes relocation of blender (SL10) to the area of SL11 and converting an existing PVC silo and railcar unloader to handle APET pellets. Emissions from this Sheetline (SL11) will be released primarily through existing wall mounted exhaust fans designated as SN-18 and SN-19.

Sheetline material throughput will increase from 184,679,194 pounds per yr to 219,719,194 pounds per year. This projected use of APET is 35,040,000 pounds per year. The permitted emissions increase for PM/PM₁₀ and VOC will be less than 0.1 tpy.

7. COMPLIANCE STATUS:

There are no outstanding compliance issues or enforcement actions.

8. APPLICABLE REGULATIONS: Previous permit

PSD Applicability: N/A

PSD Netting: N/A

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-8	Air Permit 1571-AR-9	Change
PM/PM ₁₀	47.6	47.7	+0.1
VOC	27.8	27.9	+0.1
CO	55.1	55.1	0
NO _x	5.6	5.6	0
VC	1.0	1.0	0
HCl	2.6	2.6	0

10. **MODELING: Previous permit**

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 Previous permit**

Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLV's) that pass the *PAER* or *PAIL*.

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/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	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, µg/m ³) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/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, 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

13. TESTING REQUIREMENTS: Previous permit

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	219,719,194 pounds/yr	Monthly	N
Inlines	Material Throughput	97,670,971 pounds/yr	Monthly	N
Sheetline Additives	Material Throughput	140,664 pounds/yr	Monthly	N
Inline Additives	Material Throughput	200,000 pounds/yr	Monthly	N
Sheetline (SL11)	Material Throughput	35,040,000	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: Previous permit

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily/ weekly observation, control equipment operation, etc)
01-05, 10-13, 18, 19, 21-25	20	Department Guidance & 19.501	n/a

16. DELETED CONDITIONS: Previous permit

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

Former SC	Justification for Removal
	No Deleted Conditions

17. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

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

Permit #
1571-AR-8

18. CONCURRENCE BY:

The following Supervisor concurs with the permitting decision:



Thomas Rheame, P.E.
 Manager, Air Permits