

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1899-AR-1

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

American Greetings Corp.
1400 Ohlendorf Road
Osceola, Arkansas 72370

3. PERMIT WRITER:

Bryan Leamons

4. PROCESS DESCRIPTION AND SIC CODE:

SIC Description: Greeting Card Printing
SIC Code: 2771

5. SUBMITTALS: 6/6/02; 6/13/02; 8/13/02; **8/25/02; 9/24/02**

6. REVIEWER'S NOTES:

This permitting action incorporates changes approved in two *de Minimis* applications received in June and August of 2002. The first application approved allowed the construction and operation of a verse insert press, which is a flexographic printer, in the SN-01 source area. The second application approved incorporates the retirement of ten envelope machines from the SN-01 source area. Also, the second approval allows the removal of two thermographic printers from the SN-02 area and installation of the same machines in a new area now designated as SN-05.

In this permitting action emission rates were corrected to reflect application materials. Various criteria pollutant pound per hour emissions were previously permitted at a factor of five times their actual calculated rates. This factor has been removed correcting the emission rates.

Other changes result from actual facility changes. VOC emission rates at SN-01 are increased by adding the flexographic printing and then

reduced as a result of the retirement of the envelope machines at the same source area. VOC and PM/PM₁₀ rates are also added for the new source area SN-05 and reduced by the same amount at SN-02. The predominant pollutant from this facility remains VOCs at a permitted rate of 40.03 tons per year (tpy).

7. COMPLIANCE STATUS: There are no compliance issues pending with this facility.

8. APPLICABLE REGULATIONS:

A. Applicability

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

Has this facility undergone PSD review in the past (Y/N) N Permit # N/A

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 - N/A

C. Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation
none	N/A	N/A

9. EMISSION CHANGES:

This is a new permit with the following annual emissions:

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 1899-A	Air Permit 1899-AR-1	Change
PM	5.0	0.07	-4.03
PM₁₀	5.0	0.07	-4.03
VOC	92.9	40.03	-52.87
HAPs	24.5	24.5	0
glycol ethers	5.9	4.6	-1.3

10. MODELING:

A. 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.

B. Non-Criteria Pollutants

This permit contains a TLV table for non-criteria pollutants except glycol ethers. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLVs) which would pass the *PAIL*. The TLV table follows:

Area 1 HAP Table: SN-01, 02, and 04

Minimum HAP TLV (mg/m ³)	Maximum Allowable Content (Wt %)	Minimum HAP TLV (mg/m ³)	Maximum Allowable Content (Wt %)
47.65	100%	19.06	40%
42.89	90%	14.30	30%
38.12	80%	9.53	20%
33.36	70%	4.77	10%

Minimum HAP TLV (mg/m ³)	Maximum Allowable Content (Wt %)	Minimum HAP TLV (mg/m ³)	Maximum Allowable Content (Wt %)
28.59	60%	2.38	5%
23.83	50%	0.48	1%

Area 2 HAP Table: SN-03 and SN-05

Minimum HAP TLV (mg/m ³)	Maximum Allowable Content (Wt %)	Minimum HAP TLV (mg/m ³)	Maximum Allowable Content (Wt %)
107.87	100%	43.15	40%
97.08	90%	32.36	30%
86.30	80%	21.57	20%
75.51	70%	10.79	10%
64.72	60%	5.39	5%
53.94	50%	1.08	1%

Glycol ethers are separately modeled for the issuance of this permit. In 1899-A it was determined that most pollutants passed modeling with no issues and therefore permitted as requested in the draft. The one group of pollutants, glycol ethers, as a group known as one specific HAP, went through very specific refined modeling procedures to verify compliance with the NCPCS. Also included with the modeling was a study to determine proper TLVs for some of the specific glycol ethers because none had ever been published. TLVs were established and compliance with policy was approved. During this permitting action an update was made to the original modeling because of a decrease in total glycol ether rates due to retirement of the envelope machines and changes in some raw materials used on-site. Future modeling may be required on a case by case basis depending on the type of changes to glycol ether emission rates included in any notifications to ADEQ. See application for updated modeling results.

11. CALCULATIONS:

SN	Emission Factor Source	Emission Factor and units	Control Equipment Type	Control Equipment Efficiency	Comments
01-05	mass balances using actual	varies	baghouse at SN-04 and 05 glitter,	85% (BH)	VOC and HAPs will be

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SN	Emission Factor Source	Emission Factor and units	Control Equipment Type	Control Equipment Efficiency	Comments
	material compositions for VOCs and HAPs maximum glitter/ powder/ flock usage for PM and BH control efficiency		powder, flock applications		verified with calculation 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
01-05	VOC calculations	must meet VOC tpy in Specific Condition 1	monthly	N
01-05	HAP calculations	must meet HAP tpy in Specific Condition 2	monthly	N
01-05	maintain MSDS or labels	HAP TLV table	inspect as necessary	N

13. OPACITY

SN	Opacity %	Justification	Compliance Mechanism
02	15%	lower than Dept standards at facility's request	nat gas combustion, proper baghouse operation
03	15%	lower than Dept standards at facility's request	nat gas combustion, proper baghouse operation
05	15%	lower than Dept standards at facility's request	proper operation of thermographic presses

14. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Phil Murphy, P.E.