

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1899-AR-2 AFIN: 47-00030

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

American Greetings Corporation
1400 Ohlendorf Road
Osceola, Arkansas 72370

3. PERMIT WRITER:

Franck Houenou

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Commercial Printing (except Screen and Books)
NAICS Code: 323111

5. SUBMITTALS:

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
3/21/2016	Modification	Addition of two (2) diesel fire water pump engines (SN-06 and SN-07) and two (2) diesel fired emergency generators (SN-08 and SN-09) to the list of permitted sources.

6. REVIEWER'S NOTES:

American Greetings Corporation operates a greeting card printing, packaging, storage, and distribution facility (SIC code: 2771; NAICS: 32311) at 1400 Ohlendorf Road, in Osceola.

Emissions from the facility result from various counters, cleaners, inks, glues, and other activities related to greeting card production. The raw materials used on site cause most of the

facility permitted emissions are volatile organic compounds (VOCs) as well as hazardous air pollutants (HAPs).

This modification is to add two (2) diesel fire water pump engines and two (2) diesel fired emergency generators to the list of permitted sources. Also, the facility is adding a gasoline storage tank as a permitted source and is removing the 1.68 MMBTU/hr boiler from the insignificant activity list because that source no longer exists. The total permitted emission rate limit changes associated with this activity includes 0.4 tpy PM/PM₁₀, 04 tpy SO₂, 07 tpy VOCs, 0.9 tpy CO and 4.0 tpy NO_x.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

During an inspection of the facility on 01/15/2016, it was found that the facility utilizes two emergency fire pumps driven by unpermitted diesel fueled stationary internal combustion engines. The stationary engines are subject to 40 CFR 63, Subpart ZZZZ and are required to be listed in the permit's "Emission Unit Information" section.

This permit is to correct that issue.

8. PSD APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

b) Is the facility categorized as a major source for PSD? N

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-06, SN-07 and SN-08	HAPs	NESHAP 40 C.F.R Part 63 Subpart ZZZZ
SN-09	NO _x , CO & PM	NSPS 40 C.F.R. Part 60 Subpart IIII
SN-10	HAPs	40 C.F.R. Part 63 Subpart CCCCC

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		Hr CO: 0.51 g/Hp-Hr Hr VOC: 20.03 g/Hp-Hr			
10	Tanks 4.0.9d	N/A	None	N/A	

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

14. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
06, 07, 08, and 09	Hours of Operation	Non-resettable hour meter	Continuous	N

15. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN-01	VOC Calculations	VOC limits specified in Specific Condition #1	Monthly	N
SN-01	HAP calculations	HAPs limits specified in Specific Conditions #2	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN-01	MSDS or labels	HAP TLV Table	Inspect as necessary	N
SN-01	List of process changes	N/A	As necessary	N
06, 07, 08, and 09	Hours of Operation	500 hours per calendar year	As necessary	N
10	Amount of gasoline received	1,500 gallons per year	Monthly	N
10	Occurrence and duration of malfunction, and action taken during period of malfunction	N/A	As necessary	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
SN-06 and SN-07	40%	Reg.19.503 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Inspection
SN-08, SN-09	20%	Reg.19.503 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Inspection
SN-01	15%	Reg.18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Inspection

17. DELETED CONDITIONS:

Former SC	Justification for removal
#13	Not relevant; Currently, in addition to SN-01, facility included other sources.

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Fire Engine Northeast Diesel storage Tank	A-2			0.00			0.00	0.00
Facility Vehicle Diesel Tank	A-2			0.00			0.00	0.00
Fire Engine South Diesel Tank	A-3			0.00009			0.00009	0.00009
Gen 1 – North Diesel Tank	A-3			0.00			0.00	0.00
Gen 2 – South Diesel Tank	A-3			0.0002			0.0002	0.0002
Laser Operation	A-13			0.00087			0.00	0.00
Verse Insert	A-13			0.0206			0.00	0.00
High Speed Folder	A-13			0.0412			0.00	0.00
Glue Operations	A-13			0.0069			0.00	0.00
Miscellaneous Material Usage	A-13							

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1899-AR-1

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name:
 Permit Number:
 AFIN:

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	92.9	93.6
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0.7	
Minimum Initial Fee \$	500			
		Permit Fee \$	400	
Check if Administrative Amendment <input type="checkbox"/>		Annual Chargeable Emissions (tpy)	93.6	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	5.7	6.1	0.4
PM ₁₀	5.7	6.1	0.4
PM _{2.5}	0	0	0
SO ₂	0	0.4	0.4
VOC	92.9	93.6	0.7
CO	0	0.9	0.9
NO _x	0	4	4