

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2373-A AFIN: 16-00181

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Anchor Packaging, Inc. - Jonesboro Plant  
4708 Krueger Drive  
Jonesboro, Arkansas 72401

3. PERMIT WRITER:

Franck Houenou

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Periodical Publishers  
NAICS Code: 326199

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
6/7/2016	New	Operate twelve (12) inline thermoforming machines

6. REVIEWER'S NOTES:

Anchor Packaging (Anchor) manufactures plastic containers used primarily in the food industry for packaging and is located at 4708 Krueger Drive, Jonesboro, Craighead County, Arkansas. Anchor has submitted an application for a minor source permit, due to anticipated growth and expansion projects, to operate twelve (12) inline thermoforming machines. The proposed emissions are 8 tons per year (tpy) of PM/PM<sub>10</sub>, 45.1 tpy VOC, 88 tpy VOC, and 9.7 tpy NO<sub>x</sub>.

7. COMPLIANCE STATUS:

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

None

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*

If yes, explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
None		

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H<sub>2</sub>S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H<sub>2</sub>S Standards N

If exempt, explain: No H<sub>2</sub>S emission

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01, 02, 03, 04, 05 06, 07, 08, 09, 10, 11, and 12	Testing	Varies	None	N/A	Facility wide's emissions are computed from facility wide's throughput.

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)
None				

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)
Facility	Amount of inline material	454,644,000 lbs of inline material	Monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 03, 04, 05 06, 07, 08, 09, 10, 11, and 12	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

17. DELETED CONDITIONS:

Former SC	Justification for removal
	None

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						HAPs	
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single	Total	
Pressurized silos	A-13	0.03							
Inking	A-13			1.08					
Regrind Operation	A-13	0.03							
Cooling Towers	A-13	0.009							
Two (2) Parts Washers	A-13			1.68					

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19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
N/A

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Anchor Packaging, Inc.  
 - Jonesboro Plant  
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				<b>Old Permit</b>	<b>New Permit</b>
\$/ton factor	23.93	Permit Predominant Air Contaminant		0	45.1
Minimum Fee \$	400	Net Predominant Air Contaminant Increase		0	
Minimum Initial Fee \$	500				
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$		<u>1079.243</u>	
		Annual Chargeable Emissions (tpy)		<u>45.1</u>	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0	8	8
PM <sub>10</sub>	0	8	8
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	0	0	0
VOC	0	45.1	45.1
CO	0	88	88
NO <sub>x</sub>	0	9.7	9.7