

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2373-AR-1 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:

Kyle Crane

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Periodical Publishers  
NAICS Code: 511120

5. ALL SUBMITTALS:

| Date of Application | Type of Application<br>(New, Renewal, Modification,<br>Deminimis/Minor Mod, or<br>Administrative Amendment) | Short Description of Any Changes<br>That Would Be Considered New or<br>Modified Emissions |
|---------------------|---|---|
| 7/10/2017           | Administrative Amendment  |   |

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 an administrative amendment to permit the operation of three natural gas-fired preheaters as insignificant activities.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.  
The facility was last inspected on January 4, 2017 and was found to be in compliance.

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  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  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<br>(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) Non-Criteria Pollutants:

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

b) 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 Y

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

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 calculated 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) |
|------|---------------|--------------|-----------|--------------|
| None |               |              |           |              |

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)     |                 |      |      |                 |        |       |
|---|------------------|---------------------|-----------------|------|------|-----------------|--------|-------|
|   |                  | PM/PM <sub>10</sub> | SO <sub>2</sub> | VOC  | CO   | NO <sub>x</sub> | HAPs   |       |
|   |                  |                     |                 |      |      |                 | Single | Total |
| Three (3) Pre-heaters (0.5 MMBtu/hr each) | A-1              | 0.05                | <0.01           | 0.04 | 0.57 | 0.67            |        | <0.01 |
| 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 |      |                 |        |       |

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

| Permit # |
|----------|
| 2373-A   |

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Anchor Packaging, Inc.  
 - Jonesboro Plant  
 Permit Number: 2373-AR-1  
 AFIN: 16-00181

|                                   |                                     |  |            |            |
|-----------------------------------|-------------------------------------|--|------------|------------|
|                                   |                                     |  | Old Permit | New Permit |
| \$/ton factor                     | 23.93                               | Permit Predominant Air Contaminant       | 45.1       | 45.1       |
| Minimum Fee \$                    | 400                                 | Net Predominant Air Contaminant Increase | 0          |            |
| Minimum Initial Fee \$            | 500                                 |  |            |            |
| Check if Administrative Amendment | <input checked="" type="checkbox"/> | Permit Fee \$                            | 0          |            |
|                                   |                                     | Annual Chargeable Emissions (tpy)        | 45.1       |            |

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