

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2373-AR-2 AFIN: 16-00181

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Hermann Companies, Inc. d/b/a Anchor Packaging  
Divison of Hermann Companies, Inc.  
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:

The following is a list of ALL permit applications included in this permit revision.

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
3/2/2018	Administrative Amendment	N/A

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 a breaker plate cleaning oven as an insignificant activity.

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. ECHO shows no data on air compliance for the facility.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N  
 If yes, were GHG emission increases significant? 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 for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
None		

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N  
 If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
N/A		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

Include the results for any ambient air evaluations or modeling. Include NSR/PSD permits and permits that require an evaluation in accordance with revisions to the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

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 Y

If exempt, explain: The facility does not emit H<sub>2</sub>S

13. 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

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

15. 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				

16. 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				

17. 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

18. DELETED CONDITIONS:

Former SC	Justification for removal
None	

19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

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				
Breaker Plate Cleaning Oven	A-13	0.01						

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
2373-AR-1



## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Hermann Companies,  
 Inc. d/b/a Anchor Packaging Division  
 of Hermann Companies, Inc.  
 Permit Number: 2373-AR-2  
 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