

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1571-AR-13 AFIN: 28-00101

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Hermann Companies, Inc. d/b/a Anchor Packaging Division of Hermann Companies, Inc.
2211 North 12th Avenue
Paragould, Arkansas 72450

3. PERMIT WRITER:

Elliott Marshall

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Plastics Material and Resin Manufacturing
NAICS Code: 325211

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
12/2/2020	Deminimis	Add two new Inline Machines as IL-77 (SN-40) and IL-78 (SN-41)

6. REVIEWER'S NOTES:

Anchor Packaging Division of Herman Companies Inc. (Anchor Packaging) owns and operates a plastic packaging manufacturing facility at 2211 North 12th Avenue, Paragould, Greene County. The plant manufactures semi-rigid plastic containers used primarily in the food industry for packaging. This application was submitted to add two new Inline Machines as IL-77 (SN-40) and IL-78 (SN-41) to produce packaging from polypropylene. Permitted emissions are increasing by 8.6 tpy PM/PM₁₀, 1.2 tpy VOC, 0.40 tpy Acetone and 0.02 Total HAPs.

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 December 13, 2019; the inspection revealed no areas of concern. There are no active or pending enforcement actions.

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 ≥ 100 tpy and on the list of 28 or single pollutant ≥ 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)
N/A		

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
N/A				

11. 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		

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
N/A		

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under 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 DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

No modeling was performed for this permit revision.

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Vinyl Chloride	2.56	0.28	0.5	N

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL (µg/m ³) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m ³)	Pass?
Vinyl Chloride	25.56	4.32	Y

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01-03, 11-13, 21-25, & 04, 05, 10, 18, 19	Stack Testing conducted in November 1995	PM/PM ₁₀ – 0.000333 VOC – 0.000198 VC – 0.0000121 CO – 0.000387 NO _x – 0.0000423	None	N/A	Uncontrolled Emission Factor
18, 19	AP-42-6.6.2	PM/PM ₁₀ – 0.0003g APET/kg storage.	None	N/A	Uncontrolled Emission Factor
40, 41	Air Waste Management Assoc. – Development of Emission Factors for Polypropylene Processing	µg/g PM/PM ₁₀ : 17.3 VOC: 33.4 Acetone: 12.6 Formaldehyde: 0.17 Acrolein: 0.01 Total HAP: 0.37	None	N/A	Uncontrolled Emission Factor

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

17. 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)
N/A				

18. 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)
Sheetlines	Material Throughput	175,686,194 lbs/yr	Monthly	N
Sheetline Additives	Material Throughput	140,664 lbs/yr	Monthly	N
Sheetline (SL11)	Material Throughput	35,040,000 lbs/yr	Monthly	N
Inlines	Material Throughput	263,410,171 lbs/yr	Monthly	N
Inline Additives	Material Throughput	602,960 lbs/yr	Monthly	N
Inline #75, 76, 77 & 78	Material Throughput	94,467,840 lbs/yr	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01-05, 10-13, 18, 19, 21-25, 30-41	20%	Regulation 19.501	Inspector Observation

20. DELETED CONDITIONS:

Former SC	Justification for removal

Former SC	Justification for removal
N/A	

21. 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 ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Three (3) Parts washers	A-13							
Breaker Plate Cleaning Oven	A-13	<0.01						

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1571-AR-12

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Anchor Packaging
 Division of Herman Companies, Inc.
 Permit Number: 1571-AR-13
 AFIN: 28-00101

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	70.3	78.9
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	8.6	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	78.9	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	70.3	78.9	8.6
PM ₁₀	70.3	78.9	8.6
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	39.9	41.1	1.2
CO	78.2	78.2	0
NO _x	8.5	8.5	0
Vinyl Chloride	2.4	2.4	0
Acetone	0	0.4	0.4
Total HAPs	0	0.02	0.02