

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1899-AR-3 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:

Andrea Sandage

4. NAICS DESCRIPTION AND CODE:

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

5. ALL 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
7/9/2019	DeMinimis	Replaced SN-06 emergency fire pump.

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.

With this deminimis application, the facility proposes to replace the existing emergency fire pump diesel engine (SN-06) with a new 209 horsepower, Tier III, diesel engine. Permitted emissions decreased by 0.1 tpy CO and 0.8 tpy NO_x. Permitted emissions increased by 0.01 tpy Single HAP and 0.01 tpy Total HAP.

Combustion HAPs were included for SN-06. Combustion HAPs for other sources were not included in previous permits since they were too small and unimportant to be worth consideration. General conditions were updated.

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 inspected on April 5, 2018 and no violations were identified.

8. PSD/GHG 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.

11. AMBIENT AIR EVALUATIONS:

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 ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by

TLV) that pass the PAER or PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

c) H₂S 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 H₂S Standards N
 If exempt, explain: No H₂S 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	Mass balance using actual material compositions for VOCs and HAPs	Varies	Baghouse	85%	
06	John Deere ,Tier III specs AP-42, Table 3.3-1, 3.3-2	lb/hp-hr PM/PM ₁₀ : 1.76E-4 NOx: 5.64E-3 CO: 1.32E-3 SO ₂ : 6.15E-5 VOC: 2.51E-3 Single HAP: 1.18E-3 Total HAPs : 3.87E-3	None	N/A	209 hp Maximum hours of operation per year: 100 Hrs
07 and 08	AP-42, Table 3.3-1	PM/PM ₁₀ : 2.2E-3 lb/Hp-Hr SO ₂ : 2.05E-3 lb/Hp-Hr NOx: 3.1E-2 lb/Hp-Hr CO: 6.68E-3 lb/Hp-Hr VOC: 2.514E-3 lb/Hp-Hr	None	N/A	Maximum hours of operation per year: 500 Hrs

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
09	Testing	PM/PM ₁₀ : 0.07 g/Hp-Hr SO ₂ : 0.13 g/Hp-Hr NO _x : 2.00 g/Hp-Hr CO: 0.51 g/Hp-Hr VOC: 20.03 g/Hp-Hr	None	N/A	Maximum hours of operation per year: 500 Hrs
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	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		Condition #1		
SN-01	HAP calculations	HAPs limits specified in Specific Conditions #2	Monthly	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	Hours of Operation	100 hours per calendar year	As necessary	N
07, 08, and 09		500 hours per calendar year		
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-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
SN-06	20%	Reg.18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Inspection
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, SN-10	20%	Reg.19.503 and Ark.	Inspection

SN	Opacity	Justification for limit	Compliance Mechanism
		Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	

17. DELETED CONDITIONS:

Former SC	Justification for removal
	none

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							

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19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1899-AR-2

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: American Greetings Corporation
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			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	93.6	93.6
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	93.6	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	6.1	6.1	0
PM ₁₀	6.1	6.1	0
PM _{2.5}	0	0	0
SO ₂	0.4	0.4	0
VOC	93.6	93.6	0
CO	0.9	0.8	-0.1
NO _x	4	3.2	-0.8
Single HAP	9.5	9.51	0.01
Total HAP	24.5	24.51	0.01