

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2373-AR-3 AFIN: 16-00181

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.
4708 Krueger Drive
Jonesboro, Arkansas 72401

3. PERMIT WRITER:

Elliott Marshall

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
3/3/2021	Deminimis/Modification	-Add 6 new inline machines. -Remove CO and NO _x emissions. -Revise emission factors and add HAP emissions.

6. REVIEWER'S NOTES:

Anchor has submitted an application to:

1. Add an additional six (6) inline machines (SN-13 through SN-18).
2. Add an additional pressurized silo as an A-13 Insignificant Activity.

3. Add six (6) additional natural gas-fired Gaspacks, each rated at less than 1.0 MMBtu/hr, as A-1 Insignificant Activities.
4. Remove CO and NO_x emissions, update emission factors, and add HAP emissions at the existing inline machines (SN-01 through SN-12) based on updated information from the Manufacturer.

Permitted emission rates are increasing/decreasing by 5.3 tpy PM/PM₁₀, -35.7 tpy VOC, -88.0 tpy CO, -9.7 tpy NO_x, 3.54 tpy Acetone and 0.11 tpy 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 July 23, 2020. The inspection revealed no areas on 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)
None		

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/A
 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:

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).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Acrolein	0.23	0.025	0.0028	Y
Formaldehyde	1.5	0.165	0.0477	Y

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 Y

If exempt, explain: The facility does not emit H₂S

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
SN-01 through SN-18	INEOS Olefins & Polymers USA Vendor Data	<u>lb/lb (PP)</u> PM/PM ₁₀ : 1.73E-05 VOC: 3.34E-05 Acetone: 1.26E-05 Total HAPs: 3.70E-07 <u>lb/lb (Product Additive)</u> PM/PM ₁₀ : 1.50E-03	None	N/A	Calculations based on equipment max capacity Anti-fog additive is 2% of total throughput

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

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)
None				

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)
None				

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 03, 04, 05, 06, 07, 08, 09, 10, 11, 12, 13, 14, 15, 16, 17 and 18	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

20. DELETED CONDITIONS:

Former SC	Justification for removal
None	

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) Pre-heaters (0.5 MMBtu/hr each)	A-1	0.17	0.02	0.12	1.83	2.18		0.05
Six (6) Gaspacks (<1.0MMBtu/hr each)								
Six (6) Pressurized silos	A-13	0.04						
Inking	A-13			1.08				
Regrind Operation	A-13	0.01						

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Cooling Towers	A-13	0.009						
Two (2) Parts Washers	A-13			1.68				
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 #
2373-AR-2

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:

AFIN:

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	45.1	13.3
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	-31.8	
Minimum Initial Fee \$	500			
		Permit Fee \$	400	
Check if Administrative Amendment <input type="checkbox"/>		Annual Chargeable Emissions (tpy)	13.3	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	8	13.3	5.3
PM ₁₀	8	13.3	5.3
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	45.1	9.4	-35.7
CO	88	0	-88
NO _x	9.7	0	-9.7
Acetone	0	3.54	3.54
Total HAPs	0	0.11	0.11