

**ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
DIVISION OF AIR POLLUTION CONTROL**

Summary Report Relative to Permit Application

Submitted By: Foam Fabricators, Ltd.
3333 Sanyo Road
Forrest City, AR 72335
St. Francis County
Contact Position - Vice President
Telephone # (501) 633-9343

CSN: 62-0106

Permit No.: 1296-AR-1

Date Issued:

Submittals: 11/08/95 , 3/29/96 , 4/22/96

Summary

Foam Fabricators, Ltd. owns and operates a polystyrene package manufacturing facility located at 3333 Sanyo Road in Forrest City. The facility is currently operating under the terms and conditions of Air Permit #1296-A. This permit modification will address the increase of production at the facility from 3 million to 4.5 million pounds per year of polystyrene beads. The net effect of this modification will be an increase in of volatile organic compound (VOC) emissions from 90 tons per year to 97.2 tons per year. The operational process of the facility is described below.

Polystyrene foam for packaging is created using polystyrene beads. These beads are heated by steam from the boiler (SN-01) in a steam heated "pre-expander" (SN-03, SN-04). The heated beads are sent to the bead storage bagger (SN-05) and stored. Beads are then transferred to a molding press where they are molded into carton fillers for shipping containers. Finished product is sent to the warehouse (SN-07) until ready for shipment while rejected and scrap materials are sent to the regrind system (SN-08) before being reintroduced to the process.

Foam Fabricators, Ltd. is subject to regulation under the *Arkansas Air Pollution Control Code* (Air Code) and the *Arkansas Plan of Implementation for Air Pollution Control* (SIP).

Reviewed By: John R. Lee

Approved By: Keith A. Michaels

Applicable Regulation: Air Code SIP

Specific Conditions

1. Emissions shall not exceed the emission limits set forth in Table I of this permit.
2. Visible emissions, as measured by EPA Reference Method 9, shall not exceed the limits set forth in Table I.
3. No ground-level visible emissions that reasonably can be expected to become materially injurious to human, plant, or animal life or property; or which unreasonably interfere with enjoyment of life or use of property; shall be permitted beyond the facility property line.
4. The permittee shall operate all equipment and associated control devices within design specifications as described in the permit application at all times.
5. The permittee shall only use natural gas to fire the steam boiler (SN-01).
6. The facility shall not use more than 4.5 million pounds of polystyrene beads per year. Compliance with this Specific Condition shall be demonstrated by maintaining monthly records, completed by the 10th day of the following month, of total polystyrene bead usage at the facility. Polystyrene bead usage shall not exceed its annual limit during any period of twelve (12) consecutive months. These records shall be maintained on site and made available to Department personnel upon request.
7. This permit shall void and supersede all previously issued air permits for this facility.
8. The permittee shall comply with all applicable provisions of the *Arkansas Air Pollution Control Code* (Air Code) and the *Arkansas Plan of Implementation for Air Pollution Control* (SIP).
9. The permittee shall not make any modifications, as defined in Regulation #19 (SIP) , Section 19.2(m), without first modifying this Air Permit, as specified in the *Arkansas Air Pollution Control Code* (Air Code), Section 3(b).

Foam Fabricators, Ltd.
 Permit # 1296-AR-1
 CSN: 62-0106

TABLE I

ALLOWABLE EMISSION RATES							
SN	Description	Control	Opacity	Applicable Regulations	Pollutant	Emission Limit	
						lb/hr	tpy
01	Boiler (10.5 MMBtu)	None	20%	AC, SIP	PM/PM ₁₀	0.1	0.3
					SO ₂	0.1	0.1
					VOC	0.1	0.2
					CO	0.4	1.6
					NO _x	1.5	6.2
02	No emission point is currently associated with this source number.						
03	C.S. Scheer Pre-Expander	None	0%	AC, SIP	VOC	17.2	13.1
04	Drew Foam Pre-Expander	None	0%	AC, SIP	VOC	17.2	13.1
05	Pre-Puff Storage	None	0%	AC, SIP	VOC	29.3	22.3
06	Molding Process and VAC System	None	0%	AC, SIP	VOC	21.7	16.5
07	Warehouse	None	0%	AC, SIP	VOC	42.1	32.0
08	Regrind System	This source has an uncontrolled potential to emit of less than 1.0 lb/hr.					
TOTAL ANNUAL EMISSIONS					PM/PM ₁₀	0.1	0.3
					SO ₂	0.1	0.1
					VOC	127.3	97.2
					CO	0.4	1.6
					NO _x	1.5	6.2

ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

To: Felicia Williams, Administration Division

From: John R. Lee, Air Division

Date: May 30, 2002

Subject: Request for Permit Fee Invoice

Name and Address of Facility:

Mr. James Goodall
Foam Fabricators, Ltd.
3333 Sanyo Road
Forrest City, AR 72335

CSN: 62-0106

Permit Number: 1296-AR-1 **Media:** AIR

Permit Description: Air Code SIP

Fee Status: Modification

Fee Code: SIP

Fee Amount: \$ 400.00 (Minimum Fee)

Public Notice

Pursuant to Section 19.4 (I) of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19), the Arkansas Department of Pollution Control and Ecology gives the following notice:

Foam Fabricators, Ltd. owns and operates a polystyrene package manufacturing facility located at 3333 Sanyo Road in Forrest City. The facility is currently operating under the terms and conditions of Air Permit #1296-A. This permit modification will address the increase of production at the facility from 3 million to 4.5 million pounds per year of polystyrene beads. The net effect of this modification will be an increase in of volatile organic compound (VOC) emissions from 90 tons per year to 97.2 tons per year.

A draft copy of the permit and the permit application have been sent to the Forrest City Public Library located at 421 South Washington, Forrest City, Arkansas. Any person desiring to view these documents may do so during normal library business hours.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Michelle Gillham. Citizens desiring technical information concerning the application or permit should contact John R. Lee. Both Michelle Gillham and John R. Lee can be reached at the Department's central office, 8001 National Drive, Little Rock, (501) 682-0744.

Interested or affected persons may also submit written comments on the proposal to the Department at the above address - Attention:Michelle Gillham. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Part III of this Department's Administrative Procedures (Regulation #8).

Dated this

Randall Mathis
Director

Arkansas Department of Pollution Control and Ecology
Division of Air Pollution Control

DETERMINATION OF APPLICABILITY

Name & Location: Foam Fabricators, Ltd. - 3333 Sanyo Road, Forrest City

Contact Name: Mr. James Goodall - Vice President

Mailing Address: 3333 Sanyo Road

City: Forrest City State: Arkansas ZIP: 72335

Process Description: Polystyrene Packaging Manufacturer

CSN: 62-0106 Permit No.: 1296-AR-1 Engineer: John R. Lee

Date(s) of DOA Attempts: May 30, 2002, _____

Applicable Programs: SIP X, PSD __, NSPS __, NESHAPS __, Non-Attainment __, Air Code Only __, Not Determinable __

Pollutant	EMISSION SUMMARY TOTALS (TPY)					
	Existing	Contemp. Decrease	Contemp. Increase	Net Change	Significant Increase	After Permit
PM/PM ₁₀	<u>0.0</u>	_____	_____	<u>+0.3</u>	15	<u>0.3</u>
SO ₂	<u>0.0</u>	_____	_____	<u>+0.1</u>	40	<u>0.1</u>
VOC	<u>90.0</u>	_____	_____	<u>+7.2</u>	40	<u>97.2</u>
CO	<u>0.0</u>	_____	_____	<u>+1.6</u>	100	<u>1.6</u>
NO _x	<u>0.0</u>	_____	_____	<u>+6.2</u>	40	<u>6.2</u>
_____	_____	_____	_____	_____	_____	_____

Is facility on 28 list (100 TPY)? Yes __ No X Additional Information Required __
 Facility is "Major Source" before permit? Yes __ No X Facility is "Major Source" after Permit? Yes __ No X
 Major modification? Yes __ No __ Not applicable X Will facility emit toxic emissions? Yes __ No __
 Is the source within 10 km of a Class I area? Yes __ No X If yes, is maximum impact > 1Fg/m³ (24 hr)? Yes __ No __
 Is facility located in a non-attainment area? Yes __ No X

For PSD/Non-Attainment Review:

	Monitoring (Fg/m ³ -time)	Ambient Impact (Fg/m ³)	Monitoring Required	BACT/LEAR
PM/PM ₁₀	_____	_____	_____	_____
SO ₂	_____	_____	_____	_____
VOC	_____	_____	_____	_____
CO	_____	_____	_____	_____

NO_x _____

Other _____

Limits required on hours of operation, feed rates, etc.? Yes ____ No ____

SIP CHECKLIST

Facility Name: Foam Fabricators, Ltd. .

Permit No.: 1296-AR-1 CSN: 62-0106 Region: 20

ADMINISTRATIVE SECTION

PRIOR TO ROUTING:

COMPLETED

- | | |
|--|-------|
| 1. Request invoice from Felicia (3 copies) | _____ |
| 2. Type permit, stamp draft | _____ |
| 3. Type mailing list | _____ |
| 4. Type public notice letters to the following: | |
| a. Applicant - draft and final letters | _____ |
| b. Newspapers - local and statewide papers | _____ |
| c. Depository/library - send certified | _____ |
| d. Mayor | _____ |
| e. County Judge | _____ |
| 5. Route file to: Program Coordinator
Testing/CEMS staff
Enforcement
Air Division Chief | _____ |
| 6. When file comes back to you, check to see if the proof of publication for the receipt of application has been received. | _____ |
| 7. After corrections have been made and the Chief has signed the draft permit, make 10 copies of the public notice, 6 copies of the mailing list, 1 copy of the letters, type envelopes, and mail. | _____ |
| 8. Send a copy of the public notice and the mailing list to Michelle Gillham. | _____ |
| 9. When the public comment period is up, the fee is paid, and the proofs of publication have been received, route to Air Division Chief for signature. Make 6 copies of the permit and mail. Copies go to Enforcement, Testing/CEMS, Division Chief, | _____ |

and 3 to Permit Engineer (engineer, file, & summary book).

ENGINEERING SIP CHECKLIST

Facility Name: Foam Fabricators, Ltd.

Permit No.: 1296-AR-1 CSN: 62-0106

Permit Package must contain the following prior to the DRAFT routing.

 X

Draft Permit

Proof of publication of receipt of notice of application. Please note that ten (10) days must have elapsed from the date of this notice before a public notice on intent can be published.

 X

DOA Form

 X

Fee Worksheet

 X

Technical Justification Worksheet

 X

Copy of Plot Plan for Local Inspector

The following must be received and placed in the permit package prior to **FINAL** routing.

Proof of publication and payment of notice of intent to issue.

Fee Payment (Check PFAQ)

45 days have elapsed from the time of last publication of the public notice of intent to issue.

All required attachments are enclosed (i.e. plot plan, area map, etc.)

JUSTIFICATION WORKSHEET

Specific Conditions (list applicable specific conditions) were included in Air Permit 1296-AR-1 to comply with:

1. New Source Performance Standard Subpart _____

N / A

2. Prevention of Significant Deterioration Regulations.

N / A

3. NESHAPS.

N / A

4. Compliance with SIP.

5. Specific Conditions

1 through 9

_____ were included in this permit to assure compliance with submitted operational descriptions and/or emission limits.

6. National Ambient Air Quality Standards (NAAQS) & Pulaski County Maintenance Regulations.