

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1440-AOP-R8 AFIN: 16-00061

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Arkansas Glass Container Corporation
516 West Johnson
Jonesboro, Arkansas 72401

3. PERMIT WRITER:

Jesse Smith

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Glass Container Manufacturing
NAICS Code: 327213

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
10/5/2022	Renewal	Rounding Changes

6. REVIEWER'S NOTES:

Arkansas Glass Container Corporation owns and operates a glass container manufacturing facility in Jonesboro, Arkansas (Craighead County). In this renewal to the permit, the facility has slight changes to emissions on SN-01 and SN-03 due to rounding. The permitted yearly VOC emissions have increased by 0.1 tpy.

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 August 11, 2022. There were no areas of concern noted at this time nor on EPA's Echo database.

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? Y

- *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.

Increase of emissions in this permitting action are below the level of significance to be considered a PSD modification.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Combined Sources	NO _x	PSD (major source status, not subject to PSD review for this renewal)
SN-11	HAPs	NESHAP Subpart ZZZZ and NSPS Subpart JJJJ

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

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:

Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

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: No H₂S emissions

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	PM- Glass Mfg Handbook PM ₁₀ - Stack Test Data NO _x - Stack Test Data	PM= 2.5 lb/ton PM ₁₀ = 1.2 lb/ton NO _x = 9.43 lb/ton CO= 0.86 lb/ton VOC= 1.71 lb/ton SO ₂ =2.23 lb/ton	-	-	Uncontrolled Factors

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	CO- Stack Test Data VOC- Stack Test Data SO ₂ - Stack Test Data HAP-AP-42 1.4				
04A	Surrogate AP-42, 11.12-2	PM=0.00099 lb/ton PM ₁₀ = 0.00034 lb/ton	Fabric Sock	90%	Uncontrolled Factors
04B	Surrogate AP-42, 11.12-2	PM=0.00099 lb/ton PM ₁₀ = 0.00034 lb/ton	Fabric Sock	90%	Uncontrolled Factors
04C	Surrogate AP-42, 11.12-2	PM=0.00099 lb/ton PM ₁₀ = 0.00034 lb/ton	Fabric Sock	90%	Uncontrolled Factors
04D	Surrogate AP-42, 11.12-2	PM=0.00099 lb/ton PM ₁₀ = 0.00034 lb/ton	Baghouse	99.5%	Uncontrolled Factors
04E	Surrogate AP-42, 11.12-2	PM=0.00099 lb/ton PM ₁₀ = 0.00034 lb/ton	Baghouse	99.5%	Uncontrolled Factors
04F	Surrogate AP-42, 11.6-4	PM=0.0031 lb/ton PM ₁₀ = 0.001 lb/ton	Baghouse	Not used	Controlled
05	AP-42 Natural Gas 1.4-2 1.4-1	<u>Lb/MMSCF</u> PM/PM ₁₀ =7.6 NO _x =100 CO=84 VOC=5.5 SO ₂ =0.6	-	-	Uncontrolled Factors
08	Surrogate AP-42, 11.6-4	PM=0.0031 lb/ton PM ₁₀ = 0.001 lb/ton	Baghouse	99.5%	Uncontrolled Factors
09	Conservative Estimate	100% Evaporation of volatiles	-	-	-
11	Engine Certification	1.00 g/HP-hr NO _x 2.00 g/HP-hr CO 0.70 g/HP-hr VOC	-	-	-
	AP-42 Table 3.2-3	Lb/MMBtu: 1.94E-02 PM ₁₀ 5.88E-04 SO ₂			

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01 & 03	PM/PM ₁₀	5	Five (5) year intervals (each furnace shall be tested every five (5) years).	To help ensure ongoing compliance with criteria emission limits
	SO ₂	6C		
	VOC	25A		
	CO	10		
	NO _x	7E		

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)
04A, B, C, D, E, F, 08	Manufacturer's recommended specifications for fabric filters.	Procedure and Inspection	Routine inspection once per month.	N
04A, B, C, D, E, F, 08	Visible Emissions	Visual observation and Method 9 as needed.	At each loading event	N
08	Visible Emissions	Visual observation and Method 9 as needed.	Weekly	N

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)
01, 03	Combined Raw Materials	280 ton/day 85,500 ton/yr	Daily	Y
04A, 04B, 04C, 04F	Feldspar/Nephelene	5,400 tons/yr	Monthly	Y
	Soda Ash	24,400 tons/yr		
	Cullet	46,400 tons/yr		
04D	Sand Storage	70,000 tons/yr	Monthly	Y
04E	Limestone Storage	16,000 tons/yr	Monthly	Y
04A, 04B, 04C, 04D, 04E, 04F	Control Equipment Quality Inspections	Manufacturer's Specifications	As Performed (no less than	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
			once per month)	
08	Raw Materials	29,400 tpy	Monthly	Y
09	Forming Machine Lubricant	100,000 lb/yr	Monthly	Y
01, 03, 04A, 04B, 04C, 04D, 04E, 04F	VE Observation Results	Opacity Limit As Assigned	See PW Condition 8	N
11	Hours Operated	500 hours/yr	Monthly	Y

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 03	20	Previous Limit	Daily VE observations
04A-04E	5	Department Guidance	VE observations-each loading event
04F	5	Department Guidance	Weekly VE observations
05	5	Department Guidance	Natural Gas Usage
08	5	Department Guidance	Weekly obsrvation
11	5	Department Guidance	Natural Gas Usage

20. DELETED CONDITIONS:

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
500 gal Diesel Storage Tank	3	0	0	0.002	0	0	0	0
Cooling Towers	13	4.04	0	0	0	0	0	0
Cullet Jaw Crusher	13	0.0014	0	0	0	0	0	0

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Bottle Breaker	13	0.35	0	0	0	0	0	0
Refractory Shaker Screen	13	0.045	0	0	0	0	0	0

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 #
1440-AOP-R7

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Arkansas Glass Container Corporation
 Permit #: 1440-AOP-R8
 AFIN: 16-00061

\$/ton factor	27.27	Annual Chargeable Emissions (tpy)	<u>755.1</u>
Permit Type	Renewal No Changes	Permit Fee \$	<u>0</u>

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	0.1
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM:

Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants:

All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensable PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		109.5	109.5	0	0	109.5
PM ₁₀		53.8	53.8	0		
PM _{2.5}		0	0	0		
SO ₂		95.7	95.7	0	0	95.7
VOC		124.6	124.7	0.1	0.1	124.7
CO		55.8	55.8	0		
NO _x		425.2	425.2	0	0	425.2