STATEMENT OF BASIS

For the issuance of Air Permit # 1331-AOP-R9 AFIN: 17-00100

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Arkansas Poly & Printing, LLC
1248 South 28th Street
Van Buren, Arkansas 72956

3. PERMIT WRITER:

Kyle Bygness

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Plastics Packaging Film and Sheet (including Laminated) Manufacturing
NAICS Code: 326112

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
6/10/2026	Renewal	None

6. REVIEWER'S NOTES:

Arkansas Poly, Inc. is a manufacturer of printed and unprinted polyethylene film and bags located at 1248 South 28th Street Van Buren, Crawford County, Arkansas 72956. This application is to renew their permit. There were no equipment or emissions changes in this renewal. Empty Drums (A-6) and Stick Welding (A-7) were added as insignificant activities.

The A-7 insignificant activity is based on the use of an estimated 5 pounds per year of welding electrodes (E6010, E6011, and E7018). If additional activities are added to the

A-7 category in the future, the permittee shall provide emission calculations for the welding activity and for each additional activity before making the change.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

This facility was last inspected on April 7, 2026. There were no areas of concern noted at this time.

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 8 CAR pt. 40 requirement.)

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 Division of Environmental Quality 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 Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m^3), 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?
Arsenic	0.01	0.0011	5.45E-07	Y
Benzene	0.06	0.0066	5.72E-06	Y
Beryllium	5E-5	5.5E-06	3.27E-08	Y
Cadmium	0.01	0.0011	3.00E-06	Y

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Chromium	0.5	0.055	3.82E-06	Y
Cobalt	0.02	0.0022	2.29E-07	Y
Lead	0.05	0.0055	1.36E-06	Y
Manganese	0.1	0.011	1.04E-06	Y
Mercury	0.025	0.00275	7.09E-07	Y
Selenium	0.2	0.022	6.54E-08	Y
POM	0.2	0.022	9.38E-08	Y

c) H_2S 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 H_2S Standards Y
If exempt, explain: No H_2S present.

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01, 07, 11	MSDS Mass Balance	VOC – 536.3	None	N/A	All inks and solvents are HAP-free. VOC totals may be reduced by documented % VOC scrap disposal.
02, 03, 12, 13	AP-42 Table 1.4-1 & -2	(lb/MMscf) PM/PM_{10} – 7.6 SO_2 – 0.6 VOC – 5.5 CO – 84 NO_X – 100 (lb/hr) Single HAP-	None	N/A	Dryers Natural gas emission factors. Natural gas is only fuel used.

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		0.04 Total HAPs - 0.04			

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01, 07, 11 (VOC Scrap)	VOC content limit by percent wt	24	Every calendar month	§19.705 and A.C.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)
Facility	VOC Material Balance	249.0 tpy	Every 4-week period & 13 consecutive 4-week periods	Y
Facility	Keep SDS or equivalent documents available	None	Keep current	N
Facility	Independent Lab results of VOC	All VOC scrap credited	Quarterly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	scrap, Purchase invoices and/or shipments of VOC scrap poundage	(subtracted) from annual VOC tpy		

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02, 03, 12, 13 (Dryers)	5%	§18.501 & Natural gas only fuel	Annual Inspection by ADEQ Inspector

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
Solvent Storage Tanks (UL 142 Double wall Tank 1 & 2)	A-3	-	-	0.1	-	-	-	-
Empty Drums	A-6	-	-	-	-	-	-	-
Stick Welding (SMAW)	A-7	< 0.01	-	-	-	-	< 0.01	< 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 #
1331-AOP-R8

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Arkansas Poly & Printing, LLC
Permit Number:1331-AOP-R9
AFIN: 17-00100

$/ton factor	28.14	Annual Chargeable Emissions (tpy)	251.6
Permit Type	Renewal No Changes	Permit Fee $	0

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	☐
If Hold Active Permit, Amt of Last Annual Air Permit Invoice $	
Total Permit Fee Chargeable Emissions (tpy)	0
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 condensible 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		0.4	0.4	0		
PM_{10}		0.4	0.4	0	0	0.4
$PM_{2.5}$		0	0	0		
SO_2		0.4	0.4	0	0	0.4
VOC		249.4	249.4	0	0	249.4
CO		0.6	0.6	0		
NO_X		1.4	1.4	0	0	1.4
Single HAP	☐	0.05	0.05	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Total HAPs	☐	0.05	0.05	0		