

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2382-A AFIN: 47-00020

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Consolidated Grain & Barge Co.
700 North Pearl Street
Osceola, Arkansas 72370

3. PERMIT WRITER:

Franck Houenou

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Grain and Field Bean Merchant Wholesalers
NAICS Code: 424510

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
2/13/2017	New	Construction and operation of a grain storage facility

6. REVIEWER'S NOTES:

Consolidated Grain & Barge Co. (CGB) recently acquired a former cotton seed storage and processing facility located in Osceola, Arkansas, at 700 North Pearl St. AR 72370. With this purchase, CGB intends to establish a grain storage facility which will have the capability of receiving grain via truck and providing dry storage of the grain under covered buildings. CBG is proposing to construct an additional flat storage building (SN-04) with a storage capacity of 2.5 million bushels which will provide the site with four covered grain storage buildings with a total capacity of 3.5 million bushels of storage. The facility has submitted an application for an initial permit to operate a grain storage facility. The annual permitted emission rates are: 20.0 tpy PM and 6.8 tpy PM₁₀.

7. COMPLIANCE STATUS:

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

None

8. PSD 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*

If yes, explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
01, 02, 04, 07 and 08	PM & PM ₁₀	NSPS 40 C.F.R Part 60 Subpart DD

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

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	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM ₁₀	None	N/A	Annual Throughput 5,000,000 bushels
02	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM ₁₀	None	N/A	
03	AP-42-9.9.1-1	PM: 0.025 lb/ton PM ₁₀ : 0.0063 lb/ton	None	N/A	
04	AP-42-9.9.1-1	PM: 0.025 lb/ton PM ₁₀ : 0.0063 lb/ton	None	N/A	
05	AP-42-9.9.1-1	PM: 0.025 lb/ton PM ₁₀ : 0.0063 lb/ton	None	N/A	
06	AP-42-9.9.1-1	PM: 0.025 lb/ton PM ₁₀ : 0.0063 lb/ton	None	N/A	
07	AP-42-9.9.1-1	PM: 0.061 lb/ton PM ₁₀ : 0.034 lb/ton	None	N/A	
08	AP-42-9.9.1-1	PM: 0.086 lb/ton PM ₁₀ : 0.029 lb/ton	None	N/A	

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01, 02, 04, 07, and 08	PM	Method 5 or Method 17	Initial	40 C.F.R. §60.303(b)(1)
01, 02, 04, 07, and 08	Opacity	Method 9	Initial	40 C.F.R. §60.303(b)(3)

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)
None				

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)
01 & 02	Annual throughput	5,000,000 bushels	Annual	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01 and 02(fugitive)	5%	40 C.F.R. § 60.302(c)(1)	Observation
07 (fugitive)	0%	40 C.F.R. § 60.302(c)(2)	Observation
08 (fugitive)	10%	40 C.F.R. § 60.302(c)(3)	Observation
03 and 05(fugitive)	40%	Reg.19.503(A)(1)	Observation
04 and 06 (fugitive)	20%	Reg. 18.501(A)(2)	Observation

17. DELETED CONDITIONS:

Former SC	Justification for removal
None	

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18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
None								

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
N/A

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Consolidated Grain &
Barge Co.
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			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	0	20
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	500	
		Annual Chargeable Emissions (tpy)	20	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	0	20	20
PM ₁₀	0	6.8	6.8
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	0	0	0
CO	0	0	0
NO _x	0	0	0