

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2382-AR-1 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:

John Mazurkiewicz

4. NAICS DESCRIPTION AND CODE:

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

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
5/17/2019	Modification	Modify limits for SN-01, SN-02, SN-03 through SN-06, and SN-08 to reflect projected operations

6. REVIEWER'S NOTES:

Specific Condition #8 has been updated for clarification, as the compliance date for this condition has passed.

7. COMPLIANCE STATUS:

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

At the time of this permitting action, the Department has not performed an inspection at the facility. There are no active or pending air enforcement actions against the facility. A review of ECHO did not reveal any violations.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? No
If yes, were GHG emission increases significant? N/A

b) Is the facility categorized as a major source for PSD? No

- *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. N/A

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. PERMIT SHIELD – TITLE V PERMITS ONLY:

N/A

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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 ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Based on Department 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: N/A
 If exempt, explain: The facility is not permitted to emit hydrogen sulfide.

13. 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	Hours of Operation 1,300 hr/yr
03	AP-42-9.9.1-1	PM: 0.025 lb/ton PM ₁₀ : 0.0063 lb/ton	None	N/A	500,000 bushels/yr 1,300 hr/yr
04	AP-42-9.9.1-1	PM: 0.025 lb/ton PM ₁₀ : 0.0063 lb/ton	None	N/A	5,000,000 bushels/yr 1,300 hr/yr
05	AP-42-9.9.1-1	PM: 0.025 lb/ton PM ₁₀ : 0.0063 lb/ton	None	N/A	800,000 bushels/yr 1,300 hr/yr
06	AP-42-9.9.1-1	PM: 0.025 lb/ton PM ₁₀ : 0.0063 lb/ton	None	N/A	1,000,000 bushels/yr 1,300 hr/yr
07	AP-42-9.9.1-1	PM: 0.061 lb/ton PM ₁₀ : 0.034 lb/ton	Fully Enclosed	99%	5,000,000 bushels/yr 1,300 hr/yr
08	AP-42-9.9.1-1	PM: 0.086 lb/ton PM ₁₀ : 0.029 lb/ton	None	N/A	7,000,000 bushels/yr 1,300 hr/yr

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

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

15. 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				

16. 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	Monthly	N
08	Annual throughput	7,000,000 bushels	Monthly	N

17. 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

18. DELETED CONDITIONS:

Former SC	Justification for removal
	None

19. 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
None								

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
2382-A

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Consolidated Grain & Barge Co.

Permit Number: 2382-AR-1

AFIN: 47-00020

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	20	23.9
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	3.9	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	23.9	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	20	23.9	3.9
PM ₁₀	6.8	8	1.2
PM _{2.5}	0	0	0
SO ₂	0	0	0
VOC	0	0	0
CO	0	0	0
NO _x	0	0	0