

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0573-AOP-R22 AFIN: 70-00040

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

El Dorado Chemical Company
4500 North West Avenue
El Dorado, Arkansas 71730

3. PERMIT WRITER:

Shawn Hutchings

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Nitrogenous Fertilizer Manufacturing
NAICS Code: 325311

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
2/19/2019	Modification	Added 4 emergency engines which are existing at the facility.
11/12/2019	AA	2 sources removed.

6. REVIEWER'S NOTES:

El Dorado Chemical Company (EDCC) owns and operates a chemical manufacturing facility located at 4500 North West Avenue in El Dorado, Arkansas. This permit is to add 4 emergency engines, SN-69, 70, 71, and 72 to the permit. This permit also includes an administrative amendment to remove SN-08 and 09. Permitted emission rates increased 6.1 tpy of CO, 0.04 tpy of HAPs, and 0.4 tpy of particulate matter, SO₂, and VOC. NO_x emission are being reduced 456.8 tpy and ammonia is reduced 124.4 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 is currently under a CAO for a number of failed stack tests. The facility has submitted an application to address the last outstanding issues.

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? 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.

The modification was for 4 emergency engines. The emissions from their addition are below PSD thresholds.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-41	PM ₁₀	PSD
SN-49, SN-53, SN-54, SN-56, SN-57, & SN-61	SO ₂ VOC CO NO _x GHG Opacity	PSD
SN-50	VOC CO GHG	PSD
SN-51	VOC CO GHG	PSD
SN-59	NO _x GHG Opacity	PSD

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-61	NO _x	40 CFR Part 60, Subpart Db
SN-13	NO _x	40 CFR Part 60, Subpart G
SN-59	NO _x	40 CFR Part 60, Subpart Ga
SN-07	SO ₂ and sulfuric acid mist	40 CFR Part 60, Subpart H
SN-65, 66, 68, 69, 70, 71, 72	There are no specific emission limits or pollutants identified, but the rules generally regulate HAPs	40 CFR Part 63, Subpart ZZZZ
SN-48, SN49, SN-54, & SN-61		40 CFR Part 63, Subpart DDDDD
SN-25		40 CFR Part 63, Subpart CCCCC
SN-65	CO, PM, NMHC + NO _x	40 CFR Part 60, Subpart IIII
SN-66, 68, 69, 70, 71, 72	CO, VOC, NO _x	40 CFR Part 60, Subpart JJJJ

10. 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 Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N
 If not, explain why.

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

Y/N

If exempt, explain: _____

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H ₂ S	20 parts per million (5-minute average*)		
	80 parts per billion (8-hour average) residential area		
	100 parts per billion (8-hour average) nonresidential area		

*To determine the 5-minute average use the following equation

$$C_p = C_m (t_m/t_p)^{0.2} \text{ where}$$

C_p = 5-minute average concentration

C_m = 1-hour average concentration

t_m = 60 minutes

t_p = 5 minutes

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
05A and B	Vendor Specification	PM ₁₀ – 0.085 mg/acf	Brinks Scrubber	-	-
	Engineering Estimate	0.8 lb/hr NH ₃	Brinks Scrubber	99.5%	-
07	NSPS limit	SO ₂ – 92.0 lb/hr	Brinks Mist Eliminator	-	Remain the previous permitted limit

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	Testing	H ₂ SO ₄ – 0.123 lb/ton	Brinks Mist Eliminator	-	-
10	AP-42	NO _x - 10.0 lb/ton	best operation	-	-
	Highest lb/hr from Stack Test results of 2001-2004	HNO ₃ – 0.389 x 1.25 x 40/8.5 = 2.3 lb/hr +1.1 lb/hr from car barn NO _x - 3.3 x 1.25 x 40/8.5 = 19.5 lb/hr	-	-	Maximum nitric acid production rate is 8.5 tons/hr, and maximum nitric acid blend production is 40 tons/hr. Stack test + 25% safety factor.
13	NSPS	3.0 lb/ton of acid	refrigerated absorption	-	-
18	Process Knowledge	PM ₁₀ – 0.033 lb/ton	Baghouse	-	-
19	PM – 50,556 scfm x 011677 lb/mmft ³ x 60 min/hr x 1.2 NH ₃ - 50,556 scfm x 25 ppm x 17.1 lb/lb-mol x lb-mol/385.2 ft ³ 60min/hr x 1.2	-	-	-	
25	TANKS 4.0.9	VOC	none	-	-
26	TANKS 4.0.9	NH ₃	none	-	-
27	Testing	PM 4.8E-7 lb/ton	none	-	-
28	Testing	PM 4.8E-7 lb/ton	none	-	-
30	AP-42 Section 5.2	H ₂ SO ₄ – 0.0034 lb/1000 gallons	none	-	-
31	SOCMI	NH ₃ – 0.5	none	-	-

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		lb/hr			
32	SOCMI	NH ₃ – 1.6 lb/hr	none	-	-
33	Process Knowledge	NO _x – 0.1 lb/hr	none	-	-
	Process Knowledge	HNO ₃ – 0.1 lb/hr	none	-	-
34	Process Knowledge	PM ₁₀ – 0.7 lb/ton x 1.46 ton/hr	none	-	-
35A	Testing	PM ₁₀ – 0.1 lb/hr	baghouse	99%	-
35B	AP-42	PM 19.7 lb/hr	none		
38	EF _{PM} = Total liquid drift (lb/1000 gal) x TDS Fraction (ppm) = 0.0834 lb/1000 gal x 1,560 ppm PM ₁₀ = EF _{PM} x flowrate = 9,000 gpm x EF _{PM}			-	
40	TANKS Program	NH ₃ – 0.22lb/hr			-
41	Stack testing	NH ₃ – 10.0 lb/hr PM/PM ₁₀ – 4 lb/hr	Chemical steam scrubber	-	24-hr BACT limit is 13.8 lb/hr 30-day rolling BACT limit is 3.4 lb/hr
44	Mass Balance for sulfur oxides and sulfuric acid. Stack test from similar plant plus a safety factor of 25%.	Scrubber	-	-	
46	0.00013 lb/1000	-	-	0.001% is design	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	gal			drift loss percent provided by manufacturer.	
13	NSPS EPA/DOJ Vendor Info	NO ₂ (3-hr): 3.0 lb/ton NO ₂ (3-hr): 1.0 lb/ton (excluding SSM) NO ₂ (rolling 365-days): 0.6 lb/ton NH ₃ : 20 ppm	SCR	95%	After installation of SCR and Tail gas preheater
65 66, 68, 69, 70, 71, 72	AP-42 or NSPS	varied	none	--	
67	AP-42	0.02 lb/ton	None		
14 and 21	Vendor Specification	0.085 mg/acf PM	Scrubber	99.5 for ammonia	
59	BACT limits Testing	Varied	SCR and Tertiary abator		

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
10	NOx	7E	Every five years	Necessary for efficiency check on Venturi & Packed Tower

SN	Pollutants	Test Method	Test Interval	Justification
				Scrubber
10	HNO ₃	Approved method	Every five years	Necessary for efficiency check on Venturi & Packed Tower Scrubber
07	SO ₂	6C	Initial performance test	NSPS Requirement
05A and B	PM ₁₀	Approved method	Initial and alternating annually.	Necessary to prove that PSD has not been triggered.
14, & 21	PM, PM ₁₀ , PM _{2.5}	Method 5 or 201A, and 202	Annually until 2 consecutive passes, then once every 5 years	Necessary to prove that PSD has not been triggered.
21	NH ₃	Approved method	Annually until 3 consecutive passes, then once every 3 years	Necessary to prove adherence to the non-criteria pollutant strategy.
44	SO ₃ NO _x H ₂ SO ₄ HNO ₃	Approved method	Every five years	Necessary to prove adherence to the non-criteria pollutant strategy.
59	NH ₃	CTM-027 or equivalent	Annually until 2 consecutive passes, then once every 5 years	Necessary to prove adherence to the non-criteria pollutant strategy.
49	PM PM ₁₀ PM _{2.5} SO ₂ VOC CH ₄ CO CO ₂ N ₂ O	Method 5 & 202 Method 201A & Method 202 Method 6C Method 25A Method 18 Method 10 Method 3A Method 320,	Annually until 2 consecutive passes, then once every 5 years	Verify emissions

SN	Pollutants	Test Method	Test Interval	Justification
		ASTM D6348-03 or other approved method		
50	VOC CO ₂	25A 3A	One Time Test	Verify emissions
50	Methanol	18 or 25A	Annually until 2 consecutive passes, then once every 5 years	Verify emissions
51	VOC Pre and Post Control CO NH ₃	25A 10 320	One Time Test	Verify emissions
51	Methanol CO ₂	18 or 25A 3A	Annually until 2 consecutive passes, then once every 5 years	Verify emissions
61	PM PM ₁₀ PM _{2.5} SO ₂ VOC CO NO _x	Method 5 & 202 Method 201A & Method 202 6C 25A 10 7E	Annually until 2 consecutive passes, then once every 5 years	Verify emissions
13	NH ₃	CTM-027 or equivalent	Annually until 2 consecutive passes, then once every 5 years	Necessary to prove adherence to the non-criteria pollutant strategy.

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)
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SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
13	NO _x	CEM	Continuously	Y
07	SO ₂ emission rate	CEM	Continuously	Y
41 and 63	Ammonia and particulate emission rates	Daily sampling consisting of two 12-hour composite sample	Continuously	Y
59	NO _x and N ₂ O	CEM	Continuously	Y
49	NO _x	CEM	Continuously	Y

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)
13	weak nitric acid production	140,000 tons/12 months	Monthly	Y
38, 46, 52, 60	Total Dissolve solid	1,560 ppm	Weekly	N
59	weak nitric acid production	461,725 tons/12 months	Monthly	Y
47	strong nitric acid production	5.2 tons per hour	Hourly	Y
47	strong nitric acid production	45,625 tons/12 months	Monthly	Y
10	Scrubber parameter	hydrogen peroxide concentration	Daily	N
07	Sulfuric acid production	200,750 ton/12 months	Monthly	Y
	Sulfuric acid production	550 tons of 100% sulfuric acid per day	Daily	Y
	Sulfuric acid emission limit	4.0 lb of SO ₂ per ton of acid production, expressed as 100% H ₂ SO ₄ , and based on a 3-hr average.	Continuously and averaged every 3-hours	N
	Annual SO ₂ Emissions	N/A	Annually	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	(tpy on a calendar basis)			
30	Sulfuric acid shipped	200,750 tons/12 months	Monthly	Y
All E2 Plant	Production	525,600 tons/12 months	Monthly	Y
05A and B	Scrubber liquid flow rate for each scrubber Gas pressure drop across unit Scrubber liquid pH	225 gal/min (minimum) 2.5 in. H ₂ O (minimum) 0.5 – 6.0	Daily	N
41	BACT Limit PM	24-hour Average 0.223 lb/ton	Daily	Y
		30-day Average 0.054 lb/ton	Monthly	Y
All KT plant	Production	394,200 tons/12 months	Monthly	Y
14	Scrubber liquid flow rate Gas Pressure Drop Across Unit pH Exhaust Flow Rate	225 gal/min (minimum) 2.5 in H ₂ O (minimum) 0.5 – 6.0 131,452 acfm (maximum)	Daily	N
18	Baghouse Pressure Drop	0.5 – 8.0 in H ₂ O	Daily	N
21	Scrubber liquid flow rate Gas Pressure Drop Across Unit pH Exhaust Flow Rate	225 gal/min (minimum) 2.5 in H ₂ O (minimum) 0.5 – 6.0 131,452 acfm (maximum)	Daily	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
63	PM emissions	24-hour Average 0.223 lb/ton	Daily	Y
		30-day Average 0.054 lb/ton	Monthly	Y
	AN Production	547,500 tons/12 months	Monthly	Y
49	NH ₃ production	565,750 tons/12 months	Monthly	Y
	Natural gas usage	7,076.7 MMscf per 12 months	Monthly	Y
53	Natural gas usage	9.0 MMscf per 12 months	Monthly	Y
	Hours of operation	No more than 3 hours during any 24-hour period unless HRU outage	Daily	Y
51	Scrubber parameters	30 gpm 2 in H ₂ O	Daily	N
56	Natural gas usage	8.2 MMscf per 12 months	Monthly	Y
57	Natural gas usage	1.5 MMscf per 12 months	Monthly	Y
54	Natural gas usage	18.63 MMscf per 12 months	Monthly	Y
53, 56, 57	Flare maintenance	No limit	As required	Y
44	Amount of Oleum offload into the storage tank Percent strength of the Oleum Amount of mixed acid produced.	394,000 tons 30% 219,000 tons	Monthly	N
44	Scrubber liquid flow rate for each scrubber Gas pressure drop across unit Scrubber liquid pH	5.0 gal/min (minimum) 10 – 35 in. H ₂ O 0.5 – 7.5	Daily	N
25	usage of gasoline	40,000	Monthly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		gallons/12 months		
29	Nitric Acid Shipped	250,000 tons/12 months	Monthly	Y
40	AN Loading tonnage	65,000,000 tons/12 months	Monthly	Y
58	Ammonia Loading	226,300 tons/12 months	Monthly	Y
65 and 66 68, 69, 70, 71, 72	Hours of operation	100 hours per calendar year 500 hours	Monthly	Y
65 and 66	Engine maintenance	Change oil and filter every 500 hours of operation, or annually, whichever comes first; Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	As needed	N
67	Prills Unloaded	36,500 tons per 12 months	Monthly	Y
61	NSPS Db records	No specific limits	Monthly	Y

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
07 & 13	10%	NSPS limit	Daily Observation
54, 61	0%	BACT limit	Natural Gas

SN	Opacity	Justification for limit	Compliance Mechanism
			Combustion
49, 59	0%	BACT limit	Daily Observation
53, 56, 57	0%	BACT limit	Natural Gas Combustion
05A and B, 18, 35A, 41, 47, 63	5%	Department Guidance	Weekly Observation
52, 60	5%	Department Guidance	Weekly TDS
21, 27, 28	10%	Department Guidance	Daily Observation
14, 19	15%	Department Guidance	Daily Observation
34, 44	20%	Previous permit	Daily Observation
10, 38, 46	20%	Department Guidance	Weekly TDS
35B & 67	20%	Department Guidance	-
65	20%	Department Guidance	Annual Observation
66	5%	Department Guidance	Annual Observation
68, 69, 70, 71, 72	5%	Department Guidance	Natural gas or propane combustion

18. DELETED CONDITIONS:

Former SC	Justification for removal
No conditions were removed.	

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	H ₂ S	NH ₃	HAPs		
									Single	Total	
Molten Sulfur Storage Tank (formerly SN-23)	B-21									0.001	0.001
Diesel Storage Tank (500 Gallon) (formerly SN-24)	A-3			0.001						0.002	0.002
Diesel Storage Tank (2,000 Gallon) (formerly SN-45)	A-3			0.002						0.003	0.003
Total	A-3			0.003							

Partwashers	A-13			2.11						
2 x Ammonia Flares	A-13	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01
Sulfur Unloading/Storage	A-13						0.13			
Ammonia Offloading	A-13							0.44		
Tier 2 Warehouse	A-13	0.02								
Natural Gas Pipeline Knockout Pot	A-13			0.14						
Portable Cooling Tower	A-13	0.043								
E2 Prill Warehouse	A-13	1.03								
Total	A-13	5.49	0.01	2.26	0.01	0.01	0.13	0.54	0.01	0.01
Sulfuric Acid Solution Storage Tanks	B-21									
Ammonium Nitrate Tank	B-21									

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 #
0573-AOP-R21

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

El Dorado Chemical Company
 Permit #: 0573-AOP-R22
 AFIN: 70-00040

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	1576.64
Permit Type	Modification	Permit Fee \$	1000

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)	-580
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		122.6	123	0.4	0.4	123
PM ₁₀		102.2	102.6	0.4		
PM _{2.5}		95.7	95.7	0		
SO ₂		403.9	404.3	0.4	0.4	404.3
VOC		40.8	41.2	0.4	0.4	41.2
CO		163.8	169.9	6.1		
NO _x		778	321.2	-456.8	-456.8	321.2
CO _{2e}	<input type="checkbox"/>	1293490	1293490	0		

