

# ADEQ MINOR SOURCE AIR PERMIT

Permit No. : 0478-AR-8

IS ISSUED TO:

Riceland Foods, Inc. - Wheatley  
Wheatley, AR 72392  
St. Francis County  
AFIN: 62-00012

THIS PERMIT IS RICELAND FOODS, INC.'s AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Michael Bonds  
Chief, Air Division

September 28, 2004  
Date

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### **List of Acronyms and Abbreviations**

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM10	Particulate Matter Smaller Than Ten Microns
SO <sub>2</sub>	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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**Section I: FACILITY INFORMATION**

PERMITTEE: Riceland Foods, Inc. - Wheatley

AFIN: 62-00012

PERMIT NUMBER: 0478-AR-8

FACILITY ADDRESS: 133 Dennis  
Wheatley, AR 72392

MAILING ADDRESS P. O. Box Drawer 352  
Brinkley, AR 72021

COUNTY: St. Francis

CONTACT POSITION: Neil Washburn

TELEPHONE NUMBER: 870-673-5337

REVIEWING ENGINEER: M. Lloyd Davis, P. E.

UTM North South (Y): Zone 15: 3864.8 km

UTM East West (X): Zone 15: 672.5 km

## Section II: INTRODUCTION

### Summary

Riceland Foods, Inc., owns and operates Wheatley Grain Drying Cooperative (NAICS Code: 493130) located at 133 Dennis, Wheatley, Arkansas 72392. Operations at the Wheatley Grain Drying Cooperative include receiving, cleaning, drying, handling, storage and loadout of wheat, rice, and soybeans.

This de minimis modification of the existing permit includes:

- 1) Installation of a new, more efficient, dust collection system at Unit #4 that will include a new Aircon Model 14RA296-10 bagfilter (designated as SN-19, Unit #4 Dust System) to replace three existing cyclones (old SN-19, SN-20 and SN-21). The emission rate from SN-19 will not exceed 0.2 lb/hr of PM/PM<sub>10</sub>.
- 2) Installation of a new trash blower system that will allow the elimination of three existing cyclones (SN-03, SN-24 and SN-25).
- 3) Eliminating the following equipment/control devices that have been removed from service:

- SN-11 – Unit #2 Dust System Cyclone
- SN-16 – Unit # 4 Receiving Pit
- SN-17 – Unit #4 Receiving Pit Cyclones
- SN-18 – Unit #4 Scalperator Aspiration System
- SN-23 – Unit #4 Sanders Dryer

Equipment grain throughputs will remain the same. Because of equipment changes and some changes in emission factors, total annual permitted emission rates of PM will decrease from 150.6 tpy to 108.9 tpy and PM<sub>10</sub> rates will decrease from 49.6 tpy to 32.7 tpy. Permitted NO<sub>x</sub> emission rates will decrease from 59.2 tpy to 54.8 tpy

### Process Description

#### **UNIT #1 (Sources SN-01, SN-02, SN-04, SN-07, SN-08, SN-13, SN-26 and SN-69)**

Unit #1, originally constructed in 1941, receives various grains. The maximum annual grain receipts are estimated at 285,000 tons.

Grain is normally received at a rate of 105 tons/hr at the receiving pit (SN-01). The receiving pit is equipped with an aspiration system that transfers collected particulate dust to an Aircon bagfilter system designated as Units #1 & #2 Receiving Bagfilter (SN-02) which also captures dust from the Unit #2 receiving pit, so that the maximum hourly receiving rate for SN-02 can

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reach 210 tons/hr. The pit aspiration system captures 90% of the fugitive dust generated from unloading. The dust collected by SN-02 is transferred to a trash transfer cyclone.

The grain received at Unit #1 is scalped (cleaned) with the particulate matter controlled by the new, fully enclosed, trash blower system. The rice is conveyed to storage bins through the use of elevator legs, conveyor belts, and drag conveyors. Particulate dust generated by the grain handling systems is collected by the Unit #1 Nuisance Dust System Bagfilter (SN-04). Dust captured by the SN-04 bagfilter is transferred to the Unit #1 Scalper Cyclone (SN-03).

The moisture content of grain is reduced by drying operations in the two Hess Grain Driers (SN-07 and SN-08). The dryers are natural gas fired with heat capacity ratings of 4.1 MMBtu/hr respectively per dryer. Dryer screens and louvers control particulate matter generated by the dryers.

Dried rice is loaded onto trucks from gravity loadout spouts (SN-13) located at Unit #2.

Trash collected by the dust control devices is transferred to the Units #1, #2, #3 and #4 Trash Tank (SN-26). The nuisance dust baghouse (SN-69) controls dust generated in the Unit #1 Gallery, the Unit #2 Basement, Gallery, and Headhouse, and the Unit #4 Garner Bin.

### **Units #2/#3 (Sources SN-02, SN-09, SN-12, SN-13, SN-14, SN-15, SN-26 and SN-69)**

Unit #2 was originally constructed in 1948. Unit #3 is used for processing and storage of grain received at the Unit #2 dump pit. Unit #3 is equipped only to dry and store.

Grain is normally received at a rate of 105 tons/hr at the Unit #2 receiving pit (SN-09). The receiving pit is equipped with an aspiration system that transfers collected particulate dust to an Aircon bagfilter system designated as Units #1 & #2 Receiving Bagfilter (SN-02) which also captures dust from the Unit #1 receiving pit, so that the maximum hourly receiving rate for SN-02 can reach 210 tons/hr. The pit aspiration system captures 90% of the fugitive dust generated from unloading. The dust collected by SN-02 is transferred to a trash transfer cyclone.

The total processing rate of the Unit #2 receiving pit (SN-09) is 105 tons/hr. The receiving pit is equipped with an aspiration system for controlling fugitive emissions generated from the unloading operations. The aspiration system conveys the dust to the Units #1 & #2 Receiving Bagfilter (SN-02) for collection and control. Grain transferred in the Units is accomplished with elevator legs, belt conveyors and drag conveyors. Dust generated by these conveyors is controlled by the Units #2/#3 Rolfes Baghouse (SN-14). A baghouse was added for dust control on internal conveyors in 1999. This is the Units #2/#3/#4 Aircon Baghouse (SN-69).

The moisture content of the grain is reduced by the drying operations in two Hess driers. One drier located at Unit #2 (SN-12) and one drier at Unit #3 (SN-15). The driers are natural gas fired rack driers with heat inputs of 4.1 MMBtu/hr each. Drier screens and louvers control particulate matter generated during all drying operations.

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The Unit #2/#3 Nuisance Dust Baghouse (SN-14) controls the dust generated by the Unit #2 tunnel belts and elevator legs, and also the Unit #3 tripper belt, tunnel belt and elevator legs.

Trash collected by the dust control devices is transferred to the Units #1, #2, #3 and #4 Trash Tank (SN-26). The nuisance dust baghouse (SN-69) controls dust generated in the Unit #1 Gallery, the Unit #2 Basement, Gallery, and Headhouse, and the Unit #4 Garner Bin.

Grain is loaded onto trucks from Units #1, #2, #3 & #4 through the spouts located at Unit #2 (SN-13) at a maximum rate of 300 tons/hr.

**Unit #4 (Sources SN-01, SN-02, SN-13, SN-19, SN-22, SN-26 and SN-69)**

Unit #4, is primarily a drying and storage unit. Grains are received into Unit #4 from the Unit #1 truck dump (SN-01). The Unit # 1 truck dump is aspirated into the SN-02 Bagfilter system. Grain handling equipment in Unit #1 is vented to the SN-04 Bagfilter system.

Particulate emissions generated by the grain handling equipment are controlled by the new Aircon Model 14RA296-10 bagfilter (designated as SN-19, Unit #4 Dust System). The grain is dried in a Hess dryer (SN-22), rated at 4.1 MMBtu/hr.

Trash from Unit #4 Dust System Bagfilter is transferred by the new trash blower system to the Trash Tank (SN-26). The trash tank point source emissions are controlled by a bagfilter. Fugitive emissions will also be generated during the trash dumping process.

The nuisance dust baghouse (SN-69) controls dust generated in the Unit #1 Gallery, the Unit #2 Basement, Gallery, and Headhouse, and the Unit #4 Garner Bin.

Unit #2 loads out product received and processed in Units #1, #2, #3 and #4. Four gravity loadout spouts (SN-13) are available.

**Unit #5 (Sources SN-27, SN-29, SN-31, SN-32, SN-38, SN-39, SN-40, SN-48, SN-66, SN-67 and SN-68)**

Unit #5, originally constructed in 1959, is equipped with two truck dumps. Each of the truck dumps is estimated to receive 950,000 bushels of rice, 275,000 bushels of soybeans and 400,000 bushels of wheat annually.

The maximum combined receiving rate of the two Receiving Pits (SN-27 and SN-29) is 8500 bushels per hour. Particulate emissions generated during the unloading of the grain are controlled by the pit aspiration systems bag filter (SN-66) installed in 1997. After receiving, the grain is cleaned at a scalperator. Emissions generated by the cleaning process are controlled by the unit #5 Scalperator Dust System Baghouse (SN-31).

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The grain received at this unit is dried in a natural gas fired Shanzer Dryer (SN-68) (added in 1997) which has a rated capacity of 15 MM BTU/ hour and two Amarillo Driers (SN-38 & SN-39).

Another baghouse, the Unit #5 Upper Nuisance Dust System (SN-32) controls emissions from the top conveyors and the top of the headhouse. A bagfilter, the Unit #5 Upper Nuisance Dust System (SN-67), was added in 1997 to control emissions from the tunnel conveyors and lower headhouse.

Grain will be loaded out from Unit #5 by one truck loadout or a railcar loadout (SN-40).

Dust from the new baghouses will be transferred to the units #1, #2, #3, and #4 trash tank. Dust from the cleaning operations and the Shanzer Dryer will be transferred to the Units #5 and #6 Trash Tank (SN-48).

**Unit #6 (Sources SN-41, SN-42, SN-43, SN-44, SN-45, SN-46, SN-47, SN-48 and SN-50)**

Unit #6, originally constructed in 1966, receives 550,000 bushels of rice, 250,000 bushels of soybeans, and 200,000 bushels of wheat annually.

Grain is received at a rate of 7,000 bushels per hour at the Unit #6 Receiving Pit (SN-41). About ninety percent of the fugitive emissions generated by the receiving pit are routed to the Unit #6 Receiving Pit Cyclones (SN-42). The particulates captured in the receiving pit cyclones are routed to the Unit #6 Trash Transfer Cyclone (SN-43). The grain is then transferred to storage bins. Emissions generated by the handling of the grain are controlled by the Unit #6 Upper Nuisance Dust System (SN-44) and the Unit #6 Lower Nuisance Dust System (SN-45). The grains are dried in two Shanzer Dryers (SN-46 and SN-47). Emissions created by the drying process are controlled through the use of screens and louvers. Particulates captured by the dust control devices at this unit are sent to the Units #5 and #6 Trash Tank (SN-48).

Dried grain can be loaded out from either a truck spout or a railcar spout at Unit #6 (SN-50) at the rate of 10,000 bushels per hour.

**Unit #7 (Sources SN-51, SN-52, SN-53, SN-54, SN-55, SN-56, SN-57, SN-58, SN-59, SN-60, SN-61, SN-62, SN-63, SN-64 and SN-65)**

Grain is received at a rate of 10,000 bushels per hour at both Unit #7 Receiving Pits (SN-51 & SN-53). Around ninety percent of these emissions are routed to the Unit #7 Receiving Pit Cyclones (SN-52 and SN-54). Due to the size of Unit #7, it has been divided into a northeast section and a southwest section. Each section handles roughly half of the grain received at the unit. Emissions generated during the handling of the grain are controlled by the two Unit #7 Upper Nuisance Dust Systems (SN-59 and SN-60) and the two Unit #7 Lower Nuisance Dust Systems (SN-61 and SN-62). The grain is dried in four Berico Dryers (SN-55, SN-56, SN-57 and SN-58). Particulate matter created during the drying process is controlled through the use of screens and louvers. Debris captured on the screens is routed to the Unit #7 Dryer Sweeps



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Transfer Cyclone (SN-63). Trash captured by the Unit #7 dust controllers is transferred to the Unit #7 Trash Tank (SN-64).

Grain is loaded out at a rate of 16,000 bushels per hour from truck spouts and a railcar spout (SN-65) located at this unit.

### Regulations

The following table contains the regulations applicable to this permit.

<b>Regulations</b>
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective February 15, 1999
40 CFR Part 60, Subpart DD - <i>Standards of Performance for Grain Elevators</i>

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

### Total Allowable Emissions

<b>TOTAL ALLOWABLE EMISSIONS</b>		
<b>Pollutant</b>	<b>Emission Rates</b>	
	<b>lb/hr</b>	<b>tpy</b>
PM	516.1	108.9
PM <sub>10</sub>	134.6	32.7
CO	10.7	46.1
NO <sub>x</sub>	12.0	54.8

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### Section III: PERMIT HISTORY

**Permit No. 478-A** was issued to Wheatley Grain Drying Co-Op on March 13, 1978. The permit was issued to add aspiration on three grain receiving stations and screens on six existing grain dryers. The permit contained no emission limits.

**Permit No. 478-AR-1** was issued to Wheatley Grain Drying Co-Op on June 13, 1985. The permit modification was to install cyclofans on the outlets of the trash tanks to correct opacity problems on the vents from the tanks. There were no emission limits, but the cyclofans were assigned an opacity limit of 10%.

**Permit No. 478-AR-2** was issued to Wheatley Grain Drying Cooperative on April 22, 1991. The permit modification was issued to allow the installation of 3 new bag filters to reduce particulate emissions. There were 7 units listed with a total of 61 source numbers. Emission limits were 422.42 lb/hr and 1,850.22 tpy of PM. No other pollutants were listed. All emission sources were assigned an opacity limit for the first time.

**Permit No. 478-AR-3** was issued to Wheatley Grain Drying Cooperative - Riceland Foods, Inc. on January 28, 1994. This permit modification was to replace a cyclofan with a bag filter, add six grain dryers which were existing but unlisted, and add loadout emissions. This permit defined a baseline PSD limit for particulate matter of 588.6 tpy. There were 81 sources listed. Emission limits were: PM -588.6 tpy, SO<sub>2</sub> - 1.6 tpy, VOC - 1.7 tpy, CO - 1.9 tpy and NO<sub>x</sub> - 11.8 tpy.

**Permit No. 478-AR-4** was issued to Wheatley Grain Drying Cooperative - Riceland Foods, Inc. on August 9, 1996. This permit modification was issued for an upgrade of Unit No. 5. Permit limits were listed as PM - 23.1 tpy, PM<sub>10</sub> - 15.2 tpy, SO<sub>2</sub> - 1.4 tpy, VOC - 1.4 tpy, CO - 1.4 tpy and NO<sub>x</sub> - 3.4 tpy.

**Permit No. 478-AR-5** was issued to Wheatley Grain Drying Cooperative - Riceland Foods, Inc. on May 9, 1997. The permit modification was issued to allow for: (1) the installation of a new grain dryer, (2) replacement of six cyclones with one baghouse, (3) having a facility wide grain receiving limit, (4) increasing the opacity limits for several pieces of equipment as agreed to in the permit appeal resolution, (5) changes in the wording of the visible emissions specific condition, (6) the removal of the specific condition stating that the permittee shall comply with the SIP and the Air Code, and (7) increasing the permitted limit of natural gas usage. Permit limits were listed as PM/ PM<sub>10</sub> - 85.8 tpy, SO<sub>2</sub> - 1.5 tpy, VOC - 4.4 tpy, CO - 19.4 tpy and NO<sub>x</sub> - 78.3 tpy.

A permit appeal resolution was issued August 27, 1997 for the above permit which allowed dual opacities for the trash tanks. SN-48 was assigned opacities of 10% for the vent and 40% for the tank and SN-64 was assigned opacities of 10 % for the vent and 20% for the tank.

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**Permit No. 478-AR-6** was issued to Wheatley Grain Drying Cooperative-Riceland Foods Inc on June 28, 2000, and amended on July 7, 2000. The permit modification was issued to allow for the installation of a new dust collection System (SN-69) for the Unit 1 Gallery, and Unit 2 Basement, Gallery and Headhouse, and Unit 4 Garner bins. Permit limits were listed in tpy as PM-150.6, PM<sub>10</sub>-49.6, SO<sub>2</sub>-1.5, VOC-3.6, CO-49.7, and NOX.

**Permit No. 478-AR-7** was issued to allow the permittee to improve the dust collection system by replacing ten (10) cyclone collectors with two (2) new bagfilters. One bagfilter replaced six (6) cyclones associated with Units 1 and 2 receiving pit cyclones (sources SN-02 and SN-10). The second bagfilter replaced four (4) cyclones associated with Unit 1 Upper, Lower, and Elevator dust systems (sources SN-04, SN-05 and SN-06). As a result of this modification Unit #1 Lower Nuisance Dust System (former SN-05), Unit #1 Elevator Nuisance Dust System (former SN-06) and Unit #2 receiving pit cyclone (former SN-10) are no longer in service.

This modification also affected the emissions from the transfer cyclone (SN-03), which previously received only scalpings from the Unit 1 scalperator and transferred the material to the trash tank. The material from the two new bagfilters will also be sent to the SN-03 cyclone to be relayed to the trash tank.

The potential emissions for this modification will be from new sources SN-02 and SN-04 including the emissions increase from SN-03. The PM<sub>10</sub> emissions from SN-02 will be 0.2 tpy, and 0.1 tpy from SN-04. The increase in emissions from SN-03 was 4.0 tpy and the total potential increase in emissions resulting from installation of the baghouses was 4.3 tpy.

**Section IV: EMISSION UNIT INFORMATION**

**Specific Conditions**

1. The permittee will not exceed the emission rates set forth in the following table. [Regulation 19, §19.501 et seq., effective February 15, 1999 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
01	Unit #1 Receiving Pit (Dump #1)	PM <sub>10</sub>	0.6	*
02	Unit #2 Receiving Pit Bagfilter	PM <sub>10</sub>	0.3	*
04	Unit #1 Nuisance Dust System-	PM <sub>10</sub>	4.5	*
07	Unit #1 Hess Dryer (#101) (2.4 MMBtu/hr)	PM <sub>10</sub>	4.5	0.1 <sup>■</sup>
		CO	0.2	0.9
		NO <sub>x</sub>	0.3	1.1
08	Unit #1 Hess Dryer (#102) (2.4 MMBtu/hr)	PM <sub>10</sub>	4.5	0.2 <sup>■</sup>
		CO	0.2	0.9
		NO <sub>x</sub>	0.3	1.1
09	Unit #2 Receiving Pit (Dump #2)	PM <sub>10</sub>	0.6	*
12	Unit #2 Hess Dryer (#201) (4.1 MMBtu/hr)	PM <sub>10</sub>	15.8	0.1 <sup>■</sup>
		CO	0.2	0.9
		NO <sub>x</sub>	0.3	1.1
13	Unit #2 Loadouts	PM <sub>10</sub>	8.7	*
14	Units #2and #3 Nuisance Dust Baghouse	PM <sub>10</sub>	0.1	*
15	Unit #3 Hess Dryer (#301) (4.1 MMBtu/hr)	PM <sub>10</sub>	12.7	0.2 <sup>■</sup>
		CO	0.4	1.5
		NO <sub>x</sub>	0.5	1.8
19	Unit #4 Dust System Aircon Model 14RA296-10 Bagfilter	PM <sub>10</sub>	0.1	*
22	Unit #4 Hess Dryer (#401) (4.1 MMBtu/hr)	PM <sub>10</sub>	12.7	0.2 <sup>■</sup>
		CO	0.4	1.5
		NO <sub>x</sub>	0.5	1.8
26	Units #1, #2, #3, #4, and #5 Trash	PM <sub>10</sub>	0.4	*
27	Unit #5 Receiving Pit (Dump #4)	PM <sub>10</sub>	0.9	*
29	Unit #5 Receiving Pit (Dump #5)	PM <sub>10</sub>	0.9	*
31	Unit #5 Scalperator Aspiration	PM <sub>10</sub>	0.2	*

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32	Unit #5 Upper Nuisance Dust System	PM <sub>10</sub>	0.1	*
38	Unit #5 Amarillo Dryer (#501)	PM <sub>10</sub>	1.4	0.4 <sup>■</sup>
		CO	0.9	3.7
		NO <sub>x</sub>	1.0	4.4
39	Unit #5 Amarillo Dryer (#502)	PM <sub>10</sub>	1.4	0.4 <sup>■</sup>
		CO	0.9	3.7
		NO <sub>x</sub>	1.0	4.4
40	Unit #5 Loadouts	PM <sub>10</sub>	6.5	*
41	Unit #6 Receiving Pit (Dump #6)	PM <sub>10</sub>	1.0	*
42	Unit #6 Dump Pit #6 Cyclones	PM <sub>10</sub>	2.2	*
43	Unit #6 Trash Transfer Cyclone	PM <sub>10</sub>	4.3	*
44	Unit #6 Upper Nuisance Dust System	PM <sub>10</sub>	0.8	■
45	Unit #6 Lower Nuisance Dust System	PM <sub>10</sub>	0.8	■
46	Unit #6 Shanzer Dryer (#601)	PM <sub>10</sub>	1.1	0.2 <sup>■</sup>
		CO	0.5	2.2
		NO <sub>x</sub>	0.6	2.7
47	Unit #6 Shanzer Dryer (#602)	PM <sub>10</sub>	1.1	0.2 <sup>■</sup>
		CO	0.5	2.2
		NO <sub>x</sub>	0.6	2.7
48	Units #5 and #6 Trash Tank	PM <sub>10</sub>	0.2	*
50	Unit #6 Loadouts	PM <sub>10</sub>	6.5	*
51	Unit #7 Receiving Pit (Dump #7)	PM <sub>10</sub>	1.4	*
52	Unit #7 Dump Pit #7 Cyclones	PM <sub>10</sub>	2.5	*
53	Unit #7 Receiving Pit (Dump #8)	PM <sub>10</sub>	1.4	*
54	Unit #7 Dump Pit #8 Cyclones	PM <sub>10</sub>	2.5	*
55	Unit #7 Berico Dryer (#1)	PM <sub>10</sub>	2.6	0.5 <sup>■</sup>
		CO	1.3	5.6
		NO <sub>x</sub>	1.5	6.6
56	Unit #7 Berico Dryer (#2)	PM <sub>10</sub>	2.6	0.5 <sup>■</sup>
		CO	1.3	5.6
		NO <sub>x</sub>	1.5	6.6
57	Unit #7 Berico Dryer (#3)	PM <sub>10</sub>	2.6	0.5 <sup>■</sup>
		CO	1.3	5.6
		NO <sub>x</sub>	1.5	6.6
58	Unit #7 Berico Dryer (#4)	PM <sub>10</sub>	2.6	0.5 <sup>■</sup>
		CO	1.3	5.6
		NO <sub>x</sub>	1.5	6.6

59	Unit #7 Upper Nuisance Dust System (Northeast)	PM <sub>10</sub>	0.1	*
60	Unit #7 Upper Nuisance Dust System (Southwest)	PM <sub>10</sub>	0.1	*
61	Unit #7 Lower Nuisance Dust System (Northeast)	PM <sub>10</sub>	0.5	*
62	Unit #7 Lower Nuisance Dust System (Southwest)	PM <sub>10</sub>	0.5	*
63	Unit #7 Dryer Sweeps Transfer Cyclone	PM <sub>10</sub>	11.3	*
64	Unit #7 Trash Tank	PM <sub>10</sub>	0.8	*
65	Unit #7 Loadouts	PM <sub>10</sub>	10.4	*
66	Unit #5 Dump Pits Bagfilter	PM <sub>10</sub>	0.2	*
67	Unit #5 Lower Nuisance Dust System	PM <sub>10</sub>	0.2	*
68	Unit #5 Shanzer Dryer	PM <sub>10</sub>	1.1	0.5 <sup>▪</sup>
69	Units No. 1, 2, 3, & 4 Nuisance Dust	PM <sub>10</sub>	0.2	*

\*- The tpy limit for grain handling particulate is based on handling the throughput limit of grain for the facility through the least efficient unit (Unit #1). Particulate emissions from natural gas combustion have been added where applicable.

▪ - The SO<sub>2</sub> and CO that result from the combustion of natural gas have been omitted in this permit modification, as all of the combustion units are below 10 MMBtu/hr.

- The permittee will not exceed the emission rates set forth in the following table. The pounds per hour emission limit is based on the maximum capacity of the equipment for all sources. The tons per year emission limit for natural gas combustion products is listed at capacity for the equipment, therefore no record keeping will be necessary. The tons per year particulate emissions are based on all grain being processed through the least efficient unit (currently Unit #1). Compliance with the tons per year limit for particulate sources is based on compliance with Specific Condition No. 7. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Unit #1 Receiving Pit (Dump #1)	PM	1.9	*
02	Unit #2 Receiving Pit Bagfilter	PM	0.8	*
04	Unit #1 Nuisance Dust System-Bagfilter	PM	0.2	*
07	Unit #1 Hess Dryer (#101)	PM	18.0	43.0 <sup>▪</sup>

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08	Unit #1 Hess Dryer (#102)	PM	18.0	43.0 <sup>■</sup>
09	Unit #2 Receiving Pit (Dump #2)	PM	1.9	*
11	Unit #2 Dust System Cyclone	PM	7.0	*
12	Unit #2 Hess Dryer (#201)	PM	63.0	43.0 <sup>■</sup>
13	Unit #2 Loadouts	PM	25.8	*
14	Units #2 and #3 Nuisance Dust Baghouse	PM	0.2	*
15	Unit #3 Hess Dryer (#301)	PM	50.4	43.0 <sup>■</sup>
19	Unit #4 Dust System Aircon Model 14RA296-10 Bagfilter	PM <sub>10</sub>	0.2	*
22	Unit #4 Hess Dryer (#401)	PM	50.4	43.0 <sup>■</sup>
26	Units #1, #2, #3, #4, and #5 Trash Tank	PM	2.2	*
27	Unit #5 Receiving Pit (Dump #4)	PM	3.3	*
29	Unit #5 Receiving Pit (Dump #5)	PM	3.3	*
31	Unit #5 Scalperator Aspiration System	PM	0.8	*
32	Unit #5 Upper Nuisance Dust System	PM	0.4	*
38	Unit #5 Amarillo Dryer (#501)	PM	5.4	2.5 <sup>■</sup>
39	Unit #5 Amarillo Dryer (#502)	PM	5.4	2.5 <sup>■</sup>
40	Unit #5 Loadouts	PM	25.8	*
41	Unit #6 Receiving Pit (Dump #6)	PM	3.8	*
42	Unit #6 Dump Pit #6 Cyclones	PM	8.6	*
43	Unit #6 Trash Transfer Cyclone	PM	17.2	*
44	Unit #6 Upper Nuisance Dust System	PM	3.2	*
45	Unit #6 Lower Nuisance Dust System	PM	3.2	*
46	Unit #6 Shanzer Dryer (#601)	PM	4.1	3.4 <sup>■</sup>
47	Unit #6 Shanzer Dryer (#602)	PM	4.1	3.4 <sup>■</sup>
48	Units #5 and #6 Trash Tank	PM	0.8	*
50	Unit #6 Loadouts	PM	25.8	*
51	Unit #7 Receiving Pit (Dump #7)	PM	5.4	*
52	Unit #7 Dump Pit #7 Cyclones	PM	9.8	*

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53	Unit #7 Receiving Pit (Dump #8)	PM	5.4	*
54	Unit #7 Dump Pit #8 Cyclones	PM	9.8	*
55	Unit #7 Berico Dryer (#1)	PM	10.0	1.7 <sup>■</sup>
56	Unit #7 Berico Dryer (#2)	PM	10.0	1.7 <sup>■</sup>
57	Unit #7 Berico Dryer (#3)	PM	10.0	1.7 <sup>■</sup>
58	Unit #7 Berico Dryer (#4)	PM	10.0	1.7 <sup>■</sup>
59	Unit #7 Upper Nuisance Dust System (Northeast)	PM	0.2	*
60	Unit #7 Upper Nuisance Dust System (Southwest)	PM	0.2	*
61	Unit #7 Lower Nuisance Dust System (Northeast)	PM	1.9	*
62	Unit #7 Lower Nuisance Dust System (Southwest)	PM	1.9	*
63	Unit #7 Dryer Sweeps Transfer Cyclone	PM	44.9	*
64	Unit #7 Trash Tank	PM	2.9	*
65	Unit #7 Loadouts	PM	41.3	*
66	Unit #5 Dump Pits Bagfilter	PM	0.8	*
67	Unit #5 Lower Nuisance Dust System	PM	0.5	*
68	Unit #5 Shanzer Dryer	PM	4.1	1.6 <sup>■</sup>
69	Units No. 1, 2, 3, & 4 Nuisance Dust Baghouse	PM	0.6	*

\*- The tpy limit for grain handling particulate is based on handling the throughput limit of grain for the facility through the least efficient unit (Unit #1). Particulate emissions from natural gas combustion have been added where applicable.

■ - The SO<sub>2</sub> and CO that result from the combustion of natural gas have been omitted in this permit modification, as all of the combustion units are below 10 MMBtu/hr.

- Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]



SN	Limit	Regulatory Citation
01, 07, 08, 09, 12, 13, 22, 27, 29, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 50	40%	§19.503
26, 51, 52, 53, 54, 55, 56, 57, 58, 61, 62, 63, 64, 65, 69	20%	§19.503
02, 04, 14, 19, 48(vent), 59, 60, 64 (vent)	10%	§18.501
31, 32, 66, 67, 68	0%	§19.304 and 40 CFR 60.302

4. The permittee will not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**Facility-wide Conditions**

6. During the loading of waste material generated from grain cleaning and pollution control devices from trash tanks onto trucks for the purposes of disposal, Riceland will be limited to 20% opacity, to be determined by averaging all readings taken in accordance with USEPA Method 9, over a period of thirty-six consecutive minutes. If, at any time, Riceland exceeds the opacity limitation, the occurrence shall be reported to ADEQ in accordance with Regulation 18.

Riceland will maintain a written log at the facility which documents each time material is loaded from the trash tanks onto a truck. Each entry shall include the approximate weight of the material loaded, and the duration of the loading operation.

The activity will be conducted in such a manner as to cause no nuisance to the surrounding community. ADEQ reserves the right to rescind this authority if, at any time, the emissions from the operations become a nuisance to the surrounding community. [§18.501 of Regulation No. 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. The permittee will not process more than 285,000 tons of grain at the facility per consecutive 12 month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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8. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #7. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
9. The permittee will utilize only pipeline quality natural gas or LP gas to fuel the dryers at this facility. Record keeping of usage is not required since the dryers are permitted at maximum capacity. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

### **NSPS Requirements**

10. The facility will not emit more than 0.01 gr/dscf of particulate emissions or exhibit more than 0% opacity from SN-31, SN-32, SN-66, SN-67 and SN-68. [§19.705 of Regulation 19 and 40 CFR 60.302(b)]

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**Section V: INSIGNIFICANT ACTIVITIES**

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated December 18, 2003.

<b>Description</b>	<b>Category</b>
None submitted	

## Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
Post Office Box 8913  
Little Rock, AR 72219

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee will provide: [Regulation 19 , §19.702 and/or Regulation 18 , §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. Sampling ports adequate for applicable test methods
  - b. Safe sampling platforms
  - c. Safe access to sampling platforms
  - d. Utilities for sampling and testing equipment
9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
  - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.

- c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.
11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
  - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
  - c. To inspect any monitoring equipment or monitoring method required in this permit;
  - d. To sample any emission of pollutants; and
  - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated '8 1 106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]