ADEQ
MINOR SOURCE
AIR PERMIT

Permit #: 0927-AR-6

IS ISSUED TO:

Kraft Foods North America, Inc. – Post Cereal Division
5800 C. W. Post Drive
Jonesboro, AR 72401
Craighead County
AFIN: 16-00200

THIS PERMIT IS KRAFT FOODS NORTH AMERICA, 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:

Mike Bates
Chief, Air Division

Date

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Section I: FACILITY INFORMATION

PERMITTEE:	Kraft Foods North America, Inc. – Post cereal Division
AFIN:	16-00200
PERMIT NUMBER:	0927-AR-6
FACILITY ADDRESS:	5800 C. W. Post Drive Jonesboro, AR 72401
COUNTY:	Craighead
CONTACT POSITION:	Gary A. Best, Project Engineering Manager
TELEPHONE NUMBER:	870-933-4144
REVIEWING ENGINEER:	Joseph Hurt
UTM North-South (Y):	Zone 15: 3965.070 km
UTM East-West (X):	Zone 15: 714.967 km

Section II: INTRODUCTION

Summary

Kraft Foods North America, Inc. - Post Cereal Division owns and operates a domestic ready-to-eat cereal manufacturing facility (NAISC 311230) in Jonesboro (Craighead County). A current capital project will increase production capabilities of the plant, adding one new emission source (SN-89) to the existing Production Line and the modification of an existing source (SN-74). The Honey Bunches of Oats (HBO) Capacity Increase Project will result in the addition of the Wheat Tempering System (SN-89) to the existing Wheat Tempering and Bumping System. The modification of Line 5 Oven Exhaust #1 (SN-74) involves the removal of 2 existing burners (zones 3 & 4), the relocation of 2 existing burners (zones 1 & 2 relocated to zones 3 & 4), and the addition of 2 new burners (zones 1 & 2). Total permitted emission increases include: 1) PM_{10} from 62.5 tpy to 60.9 tpy; 2) SO_2 from 65.0 tpy to 65.1 tpy; 3) VOC from 2.6 tpy to 3.0 tpy; 4) CO from 42.9 tpy to 48.5 tpy; and 5) NO_x from 77.6 tpy to 80.7 tpy.

Process Description

Domestic ready-to-eat cereals are produced from wheat, rice, corn grits, and flours at the Kraft Foods (KF)-POST Division Jonesboro, Arkansas, plant. The project principally involves the addition of additional coating reels and a fruit system as well as the redirecting of bulk unloading exhaust.

Materials are received at the plant via truck and rail bulk deliveries. The materials are unloaded using pneumatic conveying and are processed through a preliminary cleaning process consisting of coarse screening to remove unwanted materials. Acceptable materials are pneumatically conveyed to receiving silos where an entire railcar or truck lot can be weighed for inventory purposes. These silos will be combined and exhausted from two existing dust collectors (SN-14 and SN-27).

After the weighing operation, materials are transferred to storage silos. As each grain or flour is required, it is pneumatically transferred, via the proper cleaning and blending systems (SN-13), to the cooking operation (SN-50).

The cooking operation (SN-31) combines the grain with the appropriate cooking liquids and uses live steam injection in closed pressure vessels. After appropriate cooking time, the material is conveyed to natural gas-fired dryers for initial drying (SN-32 and SN-54).

After the initial drying, material is transferred to storage. This material is then shaped and transferred to a natural gas-fired dryer and toasting oven (SN-40, 41, 42 and 43). The product is then cooled (SN-44 and SN-45) and transferred to storage.

The dried and toasted material is then mixed with vitamins and liquid coatings. The material is then dried in a natural gas fired dryer (SN-61) to the final product moisture specifications. Fruits and nuts may be added at this point of the process. The finished product is then packaged and shipped.

Particulate emissions from the above sources are controlled by several different types of equipment, including fabric filters, wet scrubbers, cyclones and dust collectors. Only the central Allergen Dust Collection System (SN-14) exceeds a 10 tpy emission rate for particulates. The Duel Fuel Water Tube Steam Boilers (SN-28 and SN-30) are permitted for use of fuel oil as well as natural gas, and are the major source of uncontrolled SO_2 emissions. At this time, only natural gas is being used.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
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 May 28, 2006
New Source Performance Standards (NSPS) Part 60, Subpart Dc., *Standards of Performance for small Industrial-Commercial-Institutional Steam Generating Units*

The following table is a summary of the facility's total emissions.

Table 1 - Total Allowable Emissions

TOTAL ALLOWABLE EMISSIONS		
Pollutant	**Emission Rates**	
	lb/hr	**tpy**
PM	19.0	61.0
PM_{10}	18.9	60.9
SO_2	15.1	65.1
VOC	0.7	3.0
CO	12.2	48.6
NO_x	19.4	80.7

Section III: PERMIT HISTORY

Permit # 0927-A was issued to General Foods Corporation on February 8, 1989. This permit allowed the facility to operate a new food processing plant to make cereal.

Permit # 0927-AR-1 was issued to Kraft General Foods on March 23, 1993.

Permit # 0927-AR-2 was issued to Kraft Foods, Post Division on April 17, 1996. This permit allowed the installation of new production line (Five batch cookers, batching bins, coolers, dryers, and a new central vacuum system batch cooking line) to the existing two production lines.

Permit # 0927-AR-3 was issued on February 3, 1997. This permit was issued to document the addition of the third line which increased production capabilities. This permit also confirmed the facility's status as a minor source with respect to the Title V Operating Air Permit Program.

Permit # 0927-AR-4 was issued on July 24, 2002. This permit modification added a new production line with additional cookers and grit drying equipment. Emission increases were less than 3 tpy of any criteria pollutant.

Permit # 0927-AR-5 was issued on May 21, 2004. This permit modification allowed for the installation of four new emission sources, including; 1) coating reels (SN-85), 2) a fruit system (SN-86), 3) a dust collection system (SN-87), and 4) a hot water heating system (SN-88). Emissions from combustion sources will increase with the installation of a new hot water heating system. Some sources previously listed without emissions, because only small amounts of particulates were exhausted through the plant ventilation system, are now listed as sources of emissions and some existing sources have had their emission rates revised because of changes in air flows through the filters or increased control efficiency. Total permitted PM_{10} emissions increased from 58.1 tpy to 62.5 tpy and permitted NO_x emissions increased from 77.2 tpy to 77.6 tpy.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee will not exceed the emission rates set forth in the following table. [§19.501 *et seq.* of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective May 28, 2006 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 2 - Criteria Pollutants

SN	Description	Pollutant	lb/hr	tpy
01	Check Bin Filter	PM_{10}	0.2	0.1
02	Check Bin Filter	PM_{10}	0.2	0.1
03	Dirty Wheat Silo Filters	PM_{10}	Source routed to SN-14	
04	Dirty Wheat Silo Filters	PM_{10}	Source routed to SN-27	
05	Clean Wheat Silo Filters	PM_{10}	Source routed to SN-14	
06	Clean Wheat Silo Filters	PM_{10}	Source routed to SN-27	
07	Bran Silo Filters	PM_{10}	Sources routed to SN-14	
08	Bran Silo Filters			
09	Bran Silo Filters			
10	Bran Silo Filters			
11	Reject Load Out Bin Filter	PM_{10}	0.2	0.1
12	Grain Unloading Dust Collector Filter	PM_{10}	0.3	0.9
13	Feed Load Out Bin Filter	PM_{10}	0.1	0.1
14	Allergen Dust Collection System (Fabric Filter)	PM_{10}	3.4	14.9
15	Dirty Durum Wheat Silo Filter (Fabric Filter)	PM_{10}	Sources routed to SN-27	
16	Clean Durum Wheat Silo Filter (Fabric Filter)			
17	Flour Silo Filter			
18	Flour Silo Filter			
19	Baghouse	PM_{10}	Sources routed to SN-14	
20	Flour Silo Filter			
21	Corn Grits Silo Filter			
22	Rice Silo Filter			
23	Flour Check Bin Filter	PM_{10}	0.2	0.1
24	Flour Check Bin Filter	PM_{10}	0.2	0.1
25	Sugar Silo Filter	PM_{10}	0.2	0.1
26	Sugar Receiver Filter (Fabric Filter)	PM_{10}	0.2	0.1
27	Non-Allergenic Dust Collection System (Fabric Filter)	PM_{10}	2.3	6.3
28, 29	Dual Fuel Water Tube Steam Boiler (30.5 MM Btu/hr)	PM_{10} SO_2 CO NO_x	0.4 14.3 4.8 6.1	1.4 62.1 20.7 26.5
30	Dual Fuel Water Tube Steam Boiler (1.255 MM Btu/hr)	PM_{10} SO_2 CO NO_x	0.1 0.7 0.3 0.3	0.1 2.9 1.0 1.3
31	Cooker Wet Rotoclone	PM_{10}	0.2	0.7
32	Grit Dryer # 2 (Natural Gas-fired)	PM_{10}	0.2	0.9

SN	Description	Pollutant	lb/hr	tpy
	+ Cyclone	CO	0.2	0.6
		NO_x	0.4	1.8
33	Grit Dryer #1 (Natural Gas-fired)	PM_{10}	0.2	0.9
	+ Cyclone	CO	0.2	0.6
		NO_x	0.7	2.9
34	Jetzone Coolers #2 + Cyclone	PM_{10}	0.1	0.1
35	Jetzone Dryer #2	PM_{10}	0.1	0.4
	(Natural Gas-fired)	CO	0.1	0.1
	2.5 MMBtu/hr	NO_x	0.3	0.9
36	Jetzone Dryer #1	PM_{10}	0.1	0.4
	(Natural Gas-fired)	CO	0.1	0.2
	2.5 MMBtu/hr	NO_x	0.3	1.1
37	Jetzone Coolers #1 + Cyclone	PM_{10}	0.1	0.1
38	Coating Reel Rotoclones #2	PM_{10}	0.1	0.1
39	Coating Reel Rotoclones #1	PM_{10}	0.1	0.1
40	Finished Food Dryer #2 + Cyclone	PM_{10}	0.1	0.3
	(Zone 1 & 2)	CO	0.1	0.1
		NO_x	0.1	0.3
41	Finished Food Dryer #1 + Cyclone	PM_{10}	0.1	0.3
	(Zone 1 & 2)	CO	0.1	0.1
		NO_x	0.1	0.3
42	Finished Food Dryers #2 + Cyclone	PM_{10}	0.1	0.3
	(Zone 3-6)	CO	0.1	0.2
		NO_x	0.2	0.6
43	Finished Food Dryers #1+ Cyclone	PM_{10}	0.1	0.3
	(Zone 3-6)	CO	0.1	0.2
		NO_x	0.2	0.6
44	Finished Food Cooler #2 + Cyclone	PM_{10}	0.1	0.1
45	Finished Food Cooler #1 + Cyclone	PM_{10}	0.1	0.1
46	Process Dust Collector #1 (Fabric Filters)	PM_{10}	0.6	2.6
47	Process Dust Collector #2 (Fabric Filter)	PM_{10}	0.6	2.6
48	Central Vacuum Systems #1 (Fabric Filters)	PM_{10}	0.1	0.3
49	Central Vacuum System #2 (Fabric Filters)	PM_{10}	0.1	0.3
50	Batch Cookers +Wet Scrubber	PM_{10}	0.3	1.2
51	Cookers	Steam Only		
52	Conveyor Hood	Steam Only		
53	Grit Cooler +Cyclone	PM_{10}	0.1	0.2
54	Grit Dryer	PM_{10}	0.4	1.4
	Natural Gas-fired	CO	0.2	0.8
	(9.9 MMBtu /hr)	NO_X	0.7	3.1
55	Grit Curing Bin, Vibratory Grader, Comil and Flaking Mill +Wet Scrubber	PM_{10}	0.1	0.4
56	Jetzone Dryers #1 (+ Cyclones)	PM_{10}	0.2	0.6
	Natural Gas-Fired	CO	0.1	0.2
	(5.0 MMBtu /hr)	NO_X	1.0	3.6
57	Jetzone Dryers #2 (+ Cyclones)	PM_{10}	0.2	0.6
	Natural Gas-Fired	CO	0.1	0.2
	(5.0 MMBtu /hr)	NO_X	1.0	3.6

SN	Description	Pollutant	lb/hr	tpy
58	Base Flake Cooler +Cyclone	PM_{10}	0.1	0.2
59	Concentrators	Steam Only		
60	Coating Reels +Wet Scrubber	PM_{10}	0.1	0.2
61	Finished Food Dryer #2 - Natural Gas-Fired (5.0 MMBtu /hr) + Dust Collector	PM_{10} CO NO_X	0.1 0.5 0.4	0.3 1.9 1.8
62	Flake Cooler	PM_{10}	0.1	0.2
63	Dry Process #3 Dust Collection System (Dust Collector)	PM_{10}	1.0	4.2
64	Central Vacuum System #3 (Baghouse)	PM_{10}	0.1	0.4
65	Wheat Cleaning Dust Collection (Fabric Filter)	PM_{10}	1.1	4.5
66	Wheat Pneumatic Conveying Dust Collection (Fabric Filter)	PM_{10}	0.4	1.6
67	Cooker Batch Bins + Wet Scrubber	PM_{10}	0.2	0.9
68	Line 5 Batch Cooker Steam Exhaust	Steam Only		
69	Line 5 Batch Cooker Hood Exhaust	Steam Only		
70	Wheat Cooler +Cyclone	PM_{10}	0.1	0.1
71	Wheat Curing Bins +Wet Scrubber	PM_{10}	0.1	0.1
72	Cured Wheat Receiving +Wet Scrubber	PM_{10}	0.1	0.1
73	Line 5 Panners No.1 & No. 2 + 2 Cyclones	PM_{10}	0.1	0.1
74	Line 5 Oven Exhaust #1 (Natural Gas-fired)	PM_{10} SO_2 CO NO_X VOC	0.2 0.1 1.3 1.6 0.1	0.6 0.1 5.8 6.9 0.4
75	Line 5 Oven Exhaust #2	CO NO_X	0.1 0.3	0.1 1.3
76	Line 5 Cooling Belt Exhaust	Steam Only		
77	Line 5 Coating + Wet Scrubber	PM_{10}	0.1	0.1
78	Finished Food Dryer + Cyclone	PM_{10} CO NO_X	0.1 0.4 0.5	0.2 1.9 1.8
79	Line 5 System Vacuum Dust Collection (Cyclone)	PM_{10}	1.0	4.1
80	Cleaver Brooks Boiler (Natural Gas-fired) (34.45 MM Btu/hr)	PM_{10} VOC CO NO_X	0.5 0.2 1.3 3.5	0.7 0.9 5.3 15.1
81	Hot Water Heater (Natural Gas-fired) (9.0 MMBtu/hr)	PM_{10} VOC CO NO_X	0.1 0.3 0.8 0.2	0.2 1.3 3.2 0.7
82	Central Vacuum System #4 (Fabric Filter)	PM_{10}	0.1	0.4
83	Cooker Discharge Belt Conveyor Hood	Steam Only		
84	Vitamin Coating Reel + Wet Scrubber	PM_{10}	0.1	0.1
85	Coating Reels, Line 4 (+Wet Scrubber)	PM_{10}	0.1	0.2
86	Fruit System, Lines 3 and 4 (+Fabric Filter)	PM_{10}	0.1	0.1
87	Corn Cleaning Dust Collection System (Baghouse)	PM_{10}	0.2	0.9
88	Hot Water Heating System – Natural Gas Fired (15 MMBtu/hr)	PM_{10} VOC	0.1 0.1	0.5 0.4

SN	Description	Pollutant	lb/hr	tpy
		CO NO_X	1.3 1.5	5.4 6.5
89	Wheat Tempering System (Lines 1 thru 4)	PM_{10}	0.1	0.2

2. The permittee will not exceed the emission rates set forth in the following table. [§18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 3 - Non-Criteria Pollutants

SN	Description	Pollutant	lb/hr	tpy
01	Check Bin Filter	PM	0.2	0.1
02	Check Bin Filter	PM	0.2	0.1
03	Dirty Wheat Silo Filters	PM	Source routed to SN-14	
04	Dirty Wheat Silo Filters	PM	Source routed to SN-27	
05	Clean Wheat Silo Filters	PM	Source routed to SN-14	
06	Clean Wheat Silo Filters	PM	Source routed to SN-27	
07	Bran Silo Filters	PM	Sources routed to SN-14	
08	Bran Silo Filters			
09	Bran Silo Filters			
10	Bran Silo Filters			
11	Reject Load Out Bin Filter	PM	0.2	0.1
12	Grain Unloading Dust Collector Filter	PM	0.3	0.9
13	Feed Load Out Bin Filter	PM	0.1	0.1
14	Allergen Dust Collection System (Fabric Filter)	PM	3.4	14.9
15	Dirty Durum Wheat Silo Filter (Fabric Filter)	PM	Sources routed to SN-27	
16	Clean Durum Wheat Silo Filter (Fabric Filter)			
17	Flour Silo Filter			
18	Flour Silo Filter			
19	Baghouse	PM	Sources routed to SN-14	
20	Flour Silo Filter			
21	Corn Grits Silo Filter			
22	Rice Silo Filter			
23	Flour Check Bin Filter	PM	0.2	0.1
24	Flour Check Bin Filter	PM	0.2	0.1
25	Sugar Silo Filter	PM	0.2	0.1
26	Sugar Receiver Filter (Fabric Filter)	PM	0.2	0.1
27	Non-Allergenic Dust Collection System (Fabric Filter)	PM	2.3	6.3
28,29	Dual Fuel Water Tube Steam Boiler (30.5 MM Btu/hr)	PM	0.4	1.4
30	Dual Fuel Water Tube Steam Boiler (1.255 MM Btu/hr)	PM	0.1	0.1
31	Cooker Wet Rotoclone	PM	0.2	0.7
32	Grit Dryer # 2 (Natural Gas-fired) + Cyclone	PM	0.2	0.9
33	Grit Dryer #1 (Natural Gas-fired) + Cyclone	PM	0.2	0.9

SN	Description	Pollutant	lb/hr	tpy
34	Jetzone Coolers #2 + Cyclone	PM	0.1	0.1
35	Jetzone Dryer #2 (Natural Gas-fired) (2.5 MMBtu/hr)	PM	0.3	0.4
36	Jetzone Dryer #1 (Natural Gas-fired) (2.5 MMBtu/hr)	PM	0.1	0.4
37	Jetzone Coolers #1 + Cyclone	PM	0.1	0.1
38	Coating Reel Rotoclones #2	PM	0.1	0.1
39	Coating Reel Rotoclones #1	PM	0.1	0.1
40	Finished Food Dryer #2 + Cyclone (Zone 1 & 2)	PM	0.1	0.3
41	Finished Food Dryer #1 + Cyclone (Zone 1 & 2)	PM	0.1	0.3
42	Finished Food Dryers #2 + Cyclone (Zone 3-6)	PM	0.1	0.3
43	Finished Food Dryers #1+ Cyclone (Zone 3-6)	PM	0.1	0.3
44	Finished Food Cooler #2 + Cyclone	PM	0.1	0.1
45	Finished Food Cooler #1 + Cyclone	PM	0.1	0.1
46	Process Dust Collector #1 (Fabric Filters)	PM	0.6	2.6
47	Process Dust Collector #2 (Fabric Filter)	PM	0.6	2.6
48	Central Vacuum Systems #1 (Fabric Filters)	PM	0.1	0.3
49	Central Vacuum System #2 (Fabric Filters)	PM	0.1	0.3
50	Batch Cookers +Wet Scrubber	PM	0.3	1.2
51	Cookers	Steam Only		
52	Conveyor Hood	Steam Only		
53	Grit Cooler +Cyclone	PM	0.1	0.2
54	Grit Dryer Natural Gas-fired (9.9 MMBtu /hr)	PM	0.4	1.4
55	Grit Curing Bin, Vibratory Grader, Comil and Flaking Mill +Wet Scrubber	PM	0.1	0.4
56	Jetzone Dryers #1 (+ Cyclones) Natural Gas-Fired (5.0 MMBtu /hr)	PM	0.2	0.6
57	Jetzone Dryers #2 (+ Cyclones) Natural Gas-Fired (5.0 MMBtu /hr)	PM	0.2	0.6
58	Base Flake Cooler +Cyclone	PM	0.1	0.2
59	Concentrators	Steam Only		
60	Coating Reels +Wet Scrubber	PM	0.1	0.2
61	Finished Food Dryer #2 - Natural Gas-Fired (5.0 MMBtu /hr) + Dust Collector	PM	0.1	0.3
62	Flake Cooler	PM	0.1	0.2
63	Dry Process #3 Dust Collection System (Dust Collector)	PM	1.0	4.2
64	Central Vacuum System #3 (Baghouse)	PM	0.1	0.4
65	Wheat Cleaning Dust Collection (Fabric Filter)	PM	1.1	4.5
66	Wheat Pneumatic Conveying Dust Collection (Fabric Filter)	PM	0.4	1.6
67	Cooker Batch Bins + Wet Scrubber	PM	0.2	0.9
68	Line 5 Batch Cooker Steam Exhaust	Steam Only		
69	Line 5 Batch Cooker Hood Exhaust	Steam Only		

SN	Description	Pollutant	lb/hr	tpy
70	Wheat Cooler +Cyclone	PM	0.1	0.1
71	Wheat Curing Bins +Wet Scrubber	PM	0.1	0.1
72	Cured Wheat Receiving +Wet Scrubber	PM	0.1	0.1
73	Line 5 Panners No.1 & No. 2 + 2 Cyclones	PM	0.1	0.1
74	Line 5 Oven Exhaust #1 (Natural Gas-fired)	PM	0.2	0.6
75	Line 5 Oven Exhaust #2	PM	0.1	0.1
76	Line 5 Cooling Belt Exhaust	Steam Only		
77	Line 5 Coating + Wet Scrubber	PM	0.1	0.1
78	Finished Food Dryer + Cyclone	PM	0.1	0.2
79	Line 5 System Vacuum Dust Collection (Cyclone)	PM	1.0	4.1
80	Cleaver Brooks Boiler (Natural Gas-fired) (34.45 MM Btu/hr)	PM	0.5	0.7
81	Hot Water Heater (Natural Gas-fired) (9.0 MMBtu/hr)	PM	0.1 0.3 0.8 0.2	0.2 1.3 3.2 0.7
82	Central Vacuum System #4 (Fabric Filter)	PM	0.1	0.4
83	Cooker Discharge Belt Conveyor Hood	Steam Only		
84	Vitamin Coating Reel + Wet Scrubber	PM	0.1	0.1
85	Coating Reels, Line 4 (+Wet Scrubber)	PM	0.1	0.2
86	Fruit System, Lines 3 and 4 (+Fabric Filter)	PM	0.1	0.1
87	Corn Cleaning Dust Collection System (Baghouse)	PM	0.2	0.9
88	Hot Water Heating System – Natural Gas Fired (15 MMBtu/hr)	PM	0.1	0.5
89	Wheat Tempering System (Lines 1 thru 4)	PM	0.1	0.2

3. Visible emissions will 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 §8-4-304 and §8-4-311]

Table 4 - Visible Emissions

SN	Limit	Regulatory Citation
All Sources	5%	§18.501

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. [§18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31]

5. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Facility-wide Conditions

6. The permittee will be limited to two inventory turnovers per week of seventeen (17) silos, 300,000 pounds storage capacity each. This is equivalent to 10,200,000 pounds of total inventory per week. [§19.705 of Regulation 19, §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. The permittee will maintain monthly records which demonstrate compliance with the inventory restriction in Specific Condition # 6. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records on site, and make the records available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

8. The permittee may use fuel oil or natural gas at SN-28 and SN-30. All other dryers and boilers will be fired by natural gas only. The sulfur content of the fuel oil shall not exceed 0.5% by weight. [§19.705 of Regulation 19, §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

9. Fuel oil usage will not exceed 2,000,000 gallons of #2 fuel oil in any consecutive twelve month period. [§19.705 of Regulation 19, §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

10. The permittee will maintain monthly records which demonstrate compliance with Specific Condition # 9. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

11. The permittee shall not exceed the maximum tempered wheat input rate in excess of that specified in the confidential permit application dated June 27, 2006 per consecutive 12 month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

12. The permittee shall maintain a copy of the confidential permit application dated June 27, 2006 on site and maintain monthly records which demonstrate compliance with Specific Condition #11. The permittee shall update the records by the fifteenth day of the month following the month to which the records pertain. The permittee shall 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 §8-4-304 and §8-4-311]

NSPS Requirements

13. The dual fuel water tube steam boiler, 30.5 MM Btu/hr (SN-28), and the Cleaver Brooks Boiler, 34.446 MM Btu/hr (SN-80) will meet all applicable requirements of NSPS Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* (Appendix A). For SN-28 and SN-80, requirements include, but are not limited to, the record keeping provisions of §60.48c (g). The facility will record and maintain records of the amount of #2 fuel oil combusted in each source (SN-28 and SN-80) on a monthly basis. [Regulation 19, §19.304 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

14. As an alternative way of record keeping (EPA Applicability Determination # 0100050), the monthly fuel usage may be prorated based on the maximum Btu rating for each source as compared to the total maximum Btu ratings for all equipment using the same type of fuel. This proration method may only be used with equipment which burns only pipeline quality natural gas, propane or low sulfur fuel oil.

$$\textit{Fuel Usage Source} = \textit{(Fuel Usage Total)} \; X \; \frac{\textit{Max. Btu Source}}{\textit{Total Max. Btu Sources}}$$

[§19.304 and 40 CFR §60.40c]

15. The permittee will maintain records to demonstrated compliance with Specific Condition #14. These records will:

    a. document the monthly meter readings or the prorated results for each source accompanied by the calculations;
    b. be updated by the fifteenth day of the month following the month to which the records pertain;
    c. be maintained on-site for a minimum of two years;
    d. be made available to Department personnel upon request.

[§19.705 of Regulation #19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated November 23, 2003.

Table 5 - Insignificant Activities

Description	Category
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. [§19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) 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. [§19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) 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. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 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. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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. [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 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: [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 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. [§19.303 of Regulation 19 and/or §18.1104 of Regulation 18 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: [§19.601 of Regulation 19 and/or §18.1101 of Regulation 18 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. [§19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 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. [§19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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 §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 §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)]

APPENDIX A

40 CFR 60 Subpart Dc

Standards of Performance for small Industrial-Commercial-Institutional Steam Generating Units