

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1563-AR-3

IS ISSUED TO:

ConAgra Foods - Huntsville Facility
1294 North College Avenue
Huntsville, Arkansas 72740
Madison County
AFIN: 44-00069

THIS PERMIT IS ConAgra Foods - Huntsville Facility'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 Porta
Interim Chief, Air Division

Date

Table of Contents

Section I: FACILITY INFORMATION.....	3
Section II: INTRODUCTION	4
<i>Summary.....</i>	<i>4</i>
<i>Process Description</i>	<i>4</i>
<i>Regulations.....</i>	<i>4</i>
Section III: PERMIT HISTORY	6
Section IV: EMISSION UNIT INFORMATION	7
<i>Specific Conditions.....</i>	<i>7</i>
<i>NSPS Requirements for SN-05 and SN-06.....</i>	<i>9</i>
Section V: INSIGNIFICANT ACTIVITIES.....	10
Section VI: GENERAL CONDITIONS.....	11
APPENDIX A.....	15

ConAgra Foods - Huntsville Facility
Permit #: 1563-AR-3
AFIN: 44-00069

Section I: FACILITY INFORMATION

PERMITTEE: ConAgra Foods - Huntsville Facility

AFIN: 44-00069

PERMIT NUMBER: 1563-AR-3

FACILITY ADDRESS: 1294 North College Avenue
Huntsville, AR 72740

COUNTY: Madison County

CONTACT PERSON: Carl Burris

CONTACT POSITION Chief Engineer

TELEPHONE NUMBER: 501-737-1026

REVIEWING ENGINEER: Patty Campbell

UTM Zone 15

UTM North-South (Y): 3,995.319 km South

UTM East-West (X): 433.684 km West

Section II: INTRODUCTION

Summary

ConAgra Foods Huntsville Facility is a turkey processing plant located at 1294 North College, Huntsville, AR 72740. The facility is located approximately three-fourth mile north of Highway 412. ConAgra seeks authorization to remove an existing 250 hp Williams/Davis boiler (SN-01) and replace it with a new 300 hp Cleaver/Brooks boiler (SN-06A/B). The new boiler will primarily be natural gas-fired but on an emergency basis will use No. 2 oil for no more than 360 hours during any consecutive 12-month period. Emissions associated with the new 300 hp boiler (SN-06A/B) are: 0.7 tpy PM/PM₁₀, 1.3 tpy SO₂, 1.0 tpy VOC, 8.3 tpy CO, and 4.4 NO_x.

Process Description

SN-02, SN-05, and SN-06A/B are natural gas fired boilers which provide steam for the plant. The boilers supply the scalders, ovens, sterilization equipment, and packaging department with steam. SN-04 provides hot water for the process line.

Birds are delivered to the unloading dock by flat bed trucks and remain there until processing. Processing starts with the unloading and transferring of birds, via conveyor line, to the kill room. There they are stunned and killed, then proceed through the scalders. The line proceeds to the picking room where the feathers are removed. The birds are transferred from the hang line to the evisceration line. They proceed through the evisceration area and are then removed from the line. Next the birds are inspected and routed to the chillers. They proceed from the chillers into the packaging area or to the baking oven (SN-05). The birds are sized before packing. The packaged birds are sent by conveyor belt to the boxing room. The boxed birds then advanced to the palletizing area where the pallets are placed in blast cells for freezing. They remain in the blast cells for 24 hours. The birds are either shipped immediately or routed to the storage freezer awaiting shipment.

The facility has emissions which are not sufficient to require an air permit under Arkansas regulations. ConAgra has chosen to retain a permit because of anticipated near term plant modifications.

Regulations

The facility is subject to regulations under the *Arkansas Air Pollution Control Code* (Air Code). The boilers (SN-05 and SN-06A/B) are subject to *New Source Performance Standards* (NSPS), 40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

ConAgra Foods - Huntsville Facility

Permit #: 1563-AR-3

AFIN: 44-00069

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

Table 1 - Total Allowable Emissions

Total Allowable Emissions		
Pollutant	Emissions Rates	
	lb/hr	tpy
PM	0.9	2.6
PM ₁₀	0.9	2.6
SO ₂	6.7	2.2
VOC	0.8	2.2
CO	4.4	16.8
NO _x	7.6	21.7

* Worst-case lb/hr and accumulative tpy used for SN-06.

ConAgra Foods - Huntsville Facility
Permit #: 1563-AR-3
AFIN: 44-00069

Section III: PERMIT HISTORY

An air Permit (#1563-A) was initially issued to this facility under the name Butterball Turkey Company on October 4, 1994.

Permit #1563-AR-1 was issued to this facility on February 14, 2000. The permit changed the following: (1) removed the existing SN-03 from the permit; (2) allowed for the addition of the Chemidyne Quikwater 75 hp natural gas, water heater (SN-04), and (3) added a new 400 hp boiler (SN-05).

Permit #1563-AR-2 was issued on September 17, 2001. This permit change corrects the permit to show the installation of a 500 hp boiler instead of the 400 hp boiler previously permitted. Emissions associated with the facility are: 2.8 tpy PM/PM₁₀, 1.3 tpy SO₂, 1.6 tpy VOC, 9.9 tpy CO, and 23.9 NO_x. The facility, after implementing the requested changes, will have emissions which are not sufficient to require an air permit under Arkansas regulations. BTC has chosen not to terminate the air permit and to instead retain a modified permit because of anticipated near term plant modifications.

Air Permit #1563-AR-2 was revised on November 9, 2005 to reflect a name change from Butterball Turkey Company to ConAgra Foods – Huntsville Facility.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

- 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 2 - Criteria Pollutants

SN	Description	Pollutant	lb/hr	Tpy
SN-01	250 hp Boiler	Removed from Service		
SN-02	200 hp Boiler	PM ₁₀	0.1	0.4
		SO ₂	0.1	0.4
		VOC	0.1	0.4
		CO	0.2	0.9
		NO _x	0.9	3.9
03	(Equipment never installed)			
04	75 hp Water Heater (1995)	PM ₁₀	0.2	0.9
		SO ₂	0.1	0.4
		VOC	0.1	0.4
		CO	0.4	1.8
		NO _x	1.5	6.6
05	500 hp Boiler (2000)	PM ₁₀	0.3	0.6
		SO ₂	0.1	0.1
		VOC	0.2	0.4
		CO	1.9	5.8
		NO _x	2.1	6.8
06A	300 hp Boiler (Natural Gas, 8,760 hrs/yr)	PM ₁₀	0.2	0.6
		SO ₂	0.1	0.1
		VOC	0.2	0.9
		CO	1.9	8.1
		NO _x	0.9	3.8
06B	300 hp Boiler (# 2 Oil, 360 hrs/yr)	PM ₁₀	0.3	0.1
		SO ₂	6.4	1.2
		VOC	0.4	0.1
		CO	0.9	0.2
		NO _x	3.1	0.6

- 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
SN-01	250 hp Boiler	Removed from Service		
SN-02	200 hp Boiler	PM	0.1	0.4
SN-03	(Equipment never installed)			
SN-04	75 hp Water Heater (1995)	PM	0.2	0.9
SN-05	500 hp Boiler (2000)	PM	0.3	0.6
SN-06A	300 hp Boiler (Natural Gas, 8760 hrs/yr)	PM	0.2	0.6
SN-06B	300 hp Boiler (# 2 Oil, 360 hrs/yr)	PM	0.3	0.1

- 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
SN-02, 04, 05 & 06A	5%	§18.501 of Regulation 18
06B	20%	§18.501 of Regulation 18

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

SN-1 Conditions

- The permittee will use only pipeline quality natural gas as fuel; except the permittee may use no. 2 oil in the 300 hp Boiler (SN-06A/B) for no more than 360 hours during any consecutive 12-month period. Natural gas usage will not exceed 361,700 MSCF of natural gas and at the facility per consecutive 12-month period. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

ConAgra Foods - Huntsville Facility

Permit #: 1563-AR-3

AFIN: 44-00069

7. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #6. The permittee will maintain a twelve month rolling total and each individual month's data on-site and made available to Department personnel upon request. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

NSPS Requirements for SN-05 and SN-06A/B

8. The permittee will maintain monthly records of the natural gas usage at boilers SN-05 and SN-06A/B. Usage of fuel can either be metered or distributed among these sources in proportion to the maximum heat capacity of each source. 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. [§19.304 of Regulation 19 and 40 CFR 60 Subpart Dc]

ConAgra Foods - Huntsville Facility
Permit #: 1563-AR-3
AFIN: 44-00069

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 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated **January 26, 2006.**

Table 5 - Insignificant Activities

Description	Category
None Identified	

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.

ConAgra Foods - Huntsville Facility

Permit #: 1563-AR-3

AFIN: 44-00069

- 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 will 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

ConAgra Foods - Huntsville Facility

Permit #: 1563-AR-3

AFIN: 44-00069

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)]

ConAgra Foods - Huntsville Facility
Permit #: 1563-AR-3
AFIN: 44-00069

APPENDIX A

NSPS SUBPART Dc

ConAgra Foods - Huntsville Facility
Permit #: 1563-AR-3
AFIN: 44-00069

Request for PDS Invoice				
Invoice Number <i>(assigned when invoice printed)</i>	PDS-			
AFIN *	44-00069			
Name <i>(for confirmation only)</i>	ConAgra Foods - Huntsville Facility			
Invoice Type (pick one) *	Initial	Mod X	Variance	
	Annual	Renewal	Interim Authority	
Permit Number *	1563-AR-3			
Media Code *	A			
Fee Code or Pmt Type*	MS			
Fee Description <i>(for confirmation only)</i>	Minor Source			
Amount Due * <i>(whole dollar amount only)</i>	\$400.			
Printed Comment <i>(600 characters maximum)</i>	Minimum Fee			
<i>Note: The information below is for use by the requesting division if desired; it will not print on the invoice.</i>				
Engineer	Patty Campbell			
Paid? (yes/no)				
Check number				
Comments				
* Required data (See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)				
Request submitted by:		Date:		

