ADEQ MINOR SOURCE AIR PERMIT

Permit #: 0730-AR-4

IS ISSUED TO:

Farmers Grain Terminal, Inc. 295 Immigrant Road Lake Village, AR 71653 Chicot County AFIN: 09-00040

THIS PERMIT IS FARMERS GRAIN TERMINAL, 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:

Michael Bonds Chief, Air Division

Date

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Section I: FACILITY INFORMATION

PERMITTEE: Farmers Grain Terminal, Inc.

AFIN: 09-00040

PERMIT NUMBER: 0730-AR-4

FACILITY ADDRESS: 295 Immigrant Road Lake Village, AR 71653 COUNTY: Chicot

CONTACT POSITION: Harvey Parrish, Senior Vice President

TELEPHONE NUMBER: (662) 332-0987

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

UTM North-South (Y): Zone 15 [3685 km]

UTM East-West (X): Zone 15 [660 km]



Section II: INTRODUCTION

Summary

Farmers Grain Terminal, Inc., operates a grain elevator (NAICS Code: 423830) located at 295 Immigrant Road in Lake Village, Chicot County, Arkansas 71653. The facility stores soybeans, wheat, milo, corn and rice. This modification will add an additional receiving pit, one storage bin and related conveying equipment. The annual throughput will be increased to 180,000 tons per year. Emission of particulates will be permitted at 11.5 tpy. Propane usage in the grain dryer will not be limited as NO_x emissions are less than 1 tpy.

Process Description

Grain is received at the two truck dump pits (SN-01A and SN-01B). The area around SN-01A is completely enclosed with a quick closing, bifold door to aid in dust collection and the aspirated dust from this pit is collected by the single facility baghouse. The new pit (SN-01B) will receive grain from hopper trucks through a shallow pit under a chock feed load to minimize dust emissions.

The grain is transferred to storage bins by an enclosed drag conveyor to the elevator leg. The elevator leg discharges grain into an enclosed belt conveyor. A series of valves and gates direct the grain into specific bins, and discharged elt conveyors or by spouting directly into storage bins. Dust captured from these grain handling operations is designated SN-02. Captured particulates from these operations are also pulled into the baghouse. There are some particulate emissions from the Storage Bin vents (SN-05). A single Model 1500 Meyer Dryer (SN-03) fired by LPG is used to dry the grain. It is capable of handling 42 tons/hour of grain and has a combustion heat rating of 9.55 MMBtu/hr. Because of the low heat capacity and limited use (333.3 hours/year) of the Dryer, no restrictions have been placed on propane usage.

Shipments are by barge and truck with dust from this transfer designated as SN-04. Emissions from the baghouse are designated as SN-06.

Regulations

This facility is subject to regulation under the Arkansas Air Pollution Control Code (Regulation 18) and the State Plan of Implementation for Air Pollution Control (Regulation 19).



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

Total Allowable Emissions			
Pollutant	Emissions Rates		
	lb/hr	tpy	
PM	83.4	11.5	
PM_{10}	30.6	4.3	
СО	11.0	2.8	
NO _x	2.0	0.5	

Table 1 - Total Allowable Emissions

Section III: PERMIT HISTORY

Air permit # 730-A, the original permit for this facility, was issued to Garnac Grain Company on March 23, 1984. The facility has been in operation since 1963.

Air permit # 730-AR-1 was issued to Garnac Grain Company on September 10, 1985, and added a single grain dryer.

Air permit # 730-AR-2 was issued to Farmers Grain terminal in late 1992 to change the ownership of the facility.

Air permit # 730-AR-3 was issued on May 30, 2000. This modification replaced an existing Column Grain Dryer with a Column Rice Dryer of 9,350 bushels/hr capacity and heated by a natural gas-fired burner rated at 9.55 MMBtu/hr. Three totally enclosed conveyors, a pneumatic conveying system and a receiver bin were also added.

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 February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	Тру
01A	Truck Receiving Pit	PM ₁₀ emissions combined with SN-06		
			Baghouse	
01B	Hopper Truck Receiving Pit	PM_{10}	3.5	0.3
02 A	Grain Handling from SN-	PM ₁₀ emissions combined with SN-06		
	01A	Baghouse		
02B	Grain Handling from SN-	PM_{10}	15.3	2.5
	01B			
03	Grain Drying and Propane	PM_{10}	2.4	0.4
	Combustion	CO	0.4	0.1
		NOx	2.0	0.4
04	Grain Shipping	PM_{10}	5.3	0.4
05	Storage Bin Vents	PM_{10}	3.4	0.6
06	Baghouse	PM ₁₀	0.5	0.1

 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
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SN	Description	Pollutant	lb/hr	Тру
01A	Truck Receiving Pit	PM emissions combined with SN-06 Baghous		
01B	Hopper Truck Receiving Pit	PM	15.8	1.3
02A	Grain Handling from SN- 01A	PM emissions combined with SN-06 Baghouse		
02B	Grain Handling from SN- 01B	PM	27.5	4.4
03	Grain Drying and Propane Combustion	PM	9.3	1.6
04	Grain Shipping	PM	15.7	1.5

05	Storage Bin Vents	PM	13.5	2.3
06	Baghouse	PM	1.6	0.4

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]

SN	Limit	Regulatory Citation
01	5%	§18.501
02	20%	§18.501
03	20%	§18.501
04	20%	§18.501
05	5%	§18.501
06	5%	§18.501

 Table 4 - Visible Emissions

- 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. [§18.801 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 not process more than 180,000 tons of product at the facility per consecutive 12-month period. [§19.705 of Regulation 19 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 Specific Condition #6. 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. [§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 **May 25, 2004.**

Table 5 - Insignificant Activities

Description	Category
None reported in the application.	

Section V: 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 will 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)]