

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 470-AR-6
IS ISSUED TO:

Riceland Foods, Inc. - Weiner Grain Drying Cooperative
137 Ewen Street
Weiner, Arkansas 72479
Poinsett County
CSN: 56-0009

THIS PERMIT IS YOUR 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 YOUR 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:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITEE: Riceland Foods, Inc. - Weiner Grain Drying
Cooperative

CSN: 56-0009

PERMIT NUMBER: 470-AR-6

FACILITY ADDRESS: 137 Ewen Street
Weiner, Arkansas 72479

COUNTY: Poinsett

CONTACT POSITION: Neil Washburn, Environmental Engineer

TELEPHONE NUMBER: 870 684 2217

REVIEWING ENGINEER: Richard Nissen

UTM North-South(X):
East-West (Y): Zone: 15 3943.5
690.1

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SECTION II: INTRODUCTION

Riceland Foods, Inc., Weiner Grain Drying Cooperative (56-0009), 137 Ewen Street, Weiner, Arkansas 72479, operates a grain processing facility. Operations at the Weiner facility include the receiving, cleaning, drying, handling, storage and shipping of rice, soybeans, and wheat. The Weiner facility is comprised of six receiving units and has a licensed grain storage capacity of 5,900,000 bushels.

ADM was purchased by Riceland in 1994. The storage facilities of ADM were used by Riceland in 1999. The new Sources (SN-45, SN-46, SN-47) are being added with this permit.

This permit is being issued to replace Permit #470-AR-5. Permit #470-AR-5 had not incorporated the comments received from the Riceland's Lonoke plant.

Process Description

Unit #1 (Sources 01 through 07)

Unit #1 was originally constructed in 1948 and typically accepts only rice.

Grain is unloaded at a rate of 3,500 bushels per hour (bu/hr) at the Receiving Pit (SN-01). Fugitive dust emissions are generated from the unloading of trucks into the pit. The grain is conveyed to storage bins through the use of elevator legs, belts, drags and screw conveyors. Dust generated by these transfer operations is collected by the Upper Nuisance Dust System cyclone (SN-02) and the Lower Nuisance Dust System cyclone (SN-03). Grain accepted at Unit #1 is generally not cleaned. Dust collected by the Unit #1 cyclones is transferred to a trash tank that is shared with Unit #3. The trash tank uses a bin vent (SN-06) to control emissions from transferred dust.

The moisture content of grain is reduced by drying operations in the Amarillo Dryer (SN-04) and Hess Dryer (SN-05). The dryers are natural gas fired with individual heat capacity ratings of 6.75 MMBtu/hr. Perforated screens control particulate emissions generated by the drying process. Combustion emissions are uncontrolled.

Grain is loaded onto trucks from two (2) spouts at a combined rate of 12,000 bu/hr. Fugitive emissions are generated from the truck loading (SN-07) operations.

Unit #2 (Sources 08 through 14)

Unit #2 was originally constructed in 1955 and typically accepts rice and soybeans. The

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entire facility throughput was assumed to be processed through this unit for simplification of record keeping.

The total processing rate of the Unit #2 Receiving Pit (SN-08) is 7,000 bu/hr. The Receiving Pit is equipped with an aspiration system that blows captured dust to a Rolfes baghouse (SN-09). Fugitive dust is generated at the receiving pit due to truck unloading operations. Dust generated from lower headhouse operations (tunnel belts, leg boots, receiving conveyors, and transfer conveyors) is also captured by the Rolfes baghouse (SN-09). A Rolfes baghouse (SN-10) also retains dust generated by the tripper belts and tops of the elevator legs. Grain is cleaned at Unit #2 by a scalperator. The scalperator is aspirated by a dust system that is controlled by a cyclone (SN-11).

The moisture content of grain is reduced by drying operations in two (2) Amarillo Dryers (SN-12 and SN-13). The dryers are natural gas fired with individual heat capacity ratings of 12.5 MMBtu/hr. Perforated screens control particulate emissions generated by the drying process. Combustion emissions are uncontrolled.

Grain is loaded onto trucks from two (2) spouts at a combined rate of 20,000 bu/hr. Fugitive emissions are generated from the truck loading (SN-14) operations.

Unit #3 (Sources 15 through 21)

Unit #3 was originally constructed in 1955 and typically accepts rice and soybeans.

The total processing rate of the Unit #3 Receiving Pit (SN-15) is 3,500 bu/hr. The Receiving Pit is equipped with an aspiration system that blows captured dust to a cyclone (SN-17). Fugitive dust is generated at the receiving pit due to truck unloading operations. The cyclone (SN-17) also captures dust generated from lower headhouse operations (tunnel belts, leg boots, receiving conveyors, and transfer conveyors). A cyclone (SN-16) also retains dust generated by the tripper belts and tops of the elevator legs. Grain is cleaned at Unit #2 by a scalperator. The scalperator is aspirated by a dust system that is controlled by a dual cyclone (SN-18).

The moisture content of grain is reduced by drying operations in the Hess Dryer (SN-19). The dryer is natural gas fired with a heat capacity ratings of 12.5 MMBtu/hr. Wire screens control particulate emissions generated by the drying process. Combustion emissions are uncontrolled.

Grain is loaded onto trucks from three (3) spouts at a combined rate of 5,000 bu/hr. Fugitive emissions are generated from the truck loading (SN-20) operations.

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Particulate from sources 02, 03, 09,10,11,16,17, and 18 is collected by the Units 1-3 Trash tank. The emissions generated by transferring the dust is controlled by a Bin Vent (SN-06). Fugitive emissions occur during the loading of dust onto trucks for disposal (SN-21).

Unit #4 (Sources 22through 29)

Unit #4 was originally constructed in 1966 and typically accepts rice only. The entire facility throughput was assumed to be processed through this unit for simplification of record keeping.

The total processing rate of the Unit #4 Receiving Pit (SN-22) is 4,500 bu/hr. The Receiving Pit is equipped with an aspiration system that blows captured dust to a trash tank bin vent filter (SN-23). Fugitive dust is generated at the receiving pit due to truck unloading operations. The bin vent filter (SN-23) also captures dust generated from the tripper belt and elevator legs. Lower headhouse operations (tunnel belts, leg boots, receiving conveyors, and transfer conveyors) and scalperator operations are retained by a Rolfes baghouse (SN-25)

Unit #4 is equipped with two (2) Trash tanks (SN-24 and SN-26). SN-24 collects particulate captured by bin vent filter SN-23. SN-26 accepts particulate collected by the Rolfes baghouse SN-25. Fugitive emissions are generated by the trash tanks during the loading of dust onto trucks.

The moisture content of grain is reduced by drying operations in the Amarillo Dryers (SN-27 and SN-28). The dryers are natural gas fired with individual heat capacity ratings of 11.75 MMBtu/hr. Wire screens control particulate emissions generated by the drying process. Combustion emissions are uncontrolled.

Grain is loaded onto trucks from two (2) spouts at a combined rate of 8,000 bu/hr. Fugitive emissions are generated from the truck loading (SN-29) operations.

Unit #5 (Sources 30 through 32 and 35)

Unit #5 was originally constructed in 1970 and typically accepts rice only. The entire facility throughput was assumed to be processed through this unit for simplification of record keeping.

The total processing rate of the Unit #5 Receiving Pit (SN-30) is 3,500 bu/hr. The Receiving Pit is equipped with an aspiration system that blows captured dust to a multiclone (SN-31). Fugitive dust is generated at the receiving pit due to truck unloading operations. Particulate matter from scalperator activities is collected by a dual cyclone (SN-36). The dual cyclone is physically located at Unit #6.

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A trash tank (SN-35) collects particulate matter captured by SN-31, SN-32, and the Unit #6 Receiving Pit multiclone (SN-34). Fugitive and point source particulate matter emissions occur from the trash tank.

Unit #6 (Sources 33,34 and 36through 44)

Unit#6 was originally constructed in 1976 and typically accepts rice, soybeans, and wheat. The entire facility throughput was assumed to be processed through this unit for simplification of record keeping.

The total processing rate of the Unit #6 Receiving Pit (SN-33) is 7,000 bu/hr. The Receiving Pit is equipped with an aspiration system and tied to a multiclone (SN-34). Fugitive dust is generated at the receiving pit due to truck unloading operations. As mentioned previously, dust captured from SN-34 is routed to SN-35.

An Aircon baghouse (SN-36) retains particulate matter from the tripper belt and elevator legs that deliver grain to the belt. Dust generated from lower headhouse operations (tunnel belts, leg boots, receiving conveyors, and transfer conveyors) is captured by a multiclone (SN-37).

The moisture content of grain is reduced by drying operations in the two (2) Amarillo Dryers (SN-38 and SN-39) and one (1) Sanders Dryer (SN-40). The dryers are natural gas fired with individual heat capacity ratings of 16.25 MMBtu/hr (Amarillo Dryers) and 3.25 MM Btu/hr (Sanders Dryer). Wire screens control particulate emissions generated by the drying process. Combustion emissions are uncontrolled.

Grain is cleaned by a scalperator. Dust generated from cleaning operations is retained by an Aircon baghouse (S N-4 I).

A trash tank (5N42) collects particulate matter captured by SN-36, SN-37, and SN-41.

Fugitive and point source particulate matter emissions occur from the Trash Tank. The Trash Tank is equipped with a bin vent filter.

Grain is loaded onto trucks from two (2) spouts at a combined rate of 12,000 bu/hr. Fugitive emissions are generated from the truck loading (SN-43) operations.

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ADM/Riceland (sources 45 through 47)

Riceland now operates, as part of the Weiner facility, a grain elevator that is under the ADM/Riceland Partnership. This facility can store approximately 300,000 bushels and has only receiving, cleaning, and loadout facilities. The ADM/Riceland facility is typically used only to store rice that has been cleaned and dried. It is used only when the Weiner facility is full. Grain from the Weiner plant will then be transferred to the ADM/Riceland plant to make room for grain receipts at Weiner. The ADM/Riceland plant can receive (SN-45), clean (SN-46), and ship (SN-47) approximately 1,500 bushels per hour.

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Regulations

This facility is subject to the following regulations:

Regulation 18, Arkansas Air Pollution Control Code.

Regulation 19, Regulations of The Arkansas Plan of Implementation for Air Pollution Control.

New Source Performance Standards, 40 CFR Part 60, Subpart DD - Standards of Performance for Grain Elevators.

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	365.8	76.9
PM ₁₀	94.8	27.0
SO ₂	1.0	0.1
VOC	1.0	0.2
CO	10.3	2.6
NO _x	12.1	3.2

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SECTION III: PERMIT HISTORY

Date	Permit Number
25 October 1978	470-A 470-A was the first permit.
30 May 1979	470-A (Modified) The facility added a new bagfilter for the trash bin.
13 May 1991	470-AR-2 The facility added three additional baghouses.
15 October 1993	470-AR-3 The facility added dryers not previously addressed, deleted SN-06 and SN-07, and combined SN-13 with SN-12.
4 October 1995	470-AR-4 The modification identified the specific point sources, quantified their emissions, and documented the replacement of the #6 dryer.
17 September 2001	470-AR-5 Increased emissions due to calculations using the most current AP-42 emission factors and the addition of the ADM sources. The permit: <ol style="list-style-type: none">1. Changed the facility's record keeping from individual grains to all grains collectively.2. Eliminated the record keeping requirement of baghouse weekly pressure drop inspections.3. Added sources SN-45, SN-46, and SN-47.4. Combined emission from source SN-26 into SN-25.5. Added 300,000 bushels of storage.

The permit was withdrawn for cause and 470-AR-6 was issued.

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SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

- Pursuant to §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, the permittee shall not exceed the emission rates set forth in the following table:

SN	Description	Pollutant	lb/hr	tpy
01	Unit #1 Receiving Pit	PM ₁₀	0.5	see SN-15
02	Unit #1 Upper Nuisance DC	PM ₁₀	0.4	see SN-16
03	Unit #1 Lower Nuisance DC	PM ₁₀	0.4	see SN-17
04	Unit #1 Amarillo Dryer (#1 East) Column Dryer w/24 mesh screen having a 0.034 in sq opening	PM ₁₀	0.4	see SN-19
		SO ₂	0.1	
		VOC	0.1	
		CO	0.6	
		NO _x	0.7	
05	Unit #1 Hess Dryer (#2 West) Column Dryer w/24 mesh screen having a 0.034 in sq opening	PM ₁₀	4.6	see SN-19
		SO ₂	0.1	
		VOC	0.1	
		CO	0.6	
		NO _x	0.7	
06	Unit #1-#3 Trash Tank Bin Vent	PM ₁₀	0.8	0.5
07	Unit #1 Loadouts (2)	PM ₁₀	7.8	see SN-20
08	Unit #2 Receiving Pit	PM ₁₀	2.0	see SN-15
09	Unit #2 HSC Baghouse	PM ₁₀	0.3	see SN-16
10	Unit #2 Rolfes Baghouse	PM ₁₀	0.1	see SN-17
11	Unit #2 Scalper Aspiration Syst.	PM ₁₀	8.6	see SN-18

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SN	Description	Pollutant	lb/hr	tpy
12	Unit #2 Dryer (#2 East) Column Dryer w/24 mesh column plate having a 0.81mm sq opening	PM ₁₀	0.6	see SN-19
		SO ₂	0.1	
		VOC	0.1	
		CO	1.1	
		NO _x	1.3	
13	Unit #2 Dryer (#1 West) Column Dryer w/24 mesh column plate having a 0.81mm sq opening	PM ₁₀	0.6	see SN-19
		SO ₂	0.1	
		VOC	0.1	
		CO	1.1	
		NO _x	1.3	
14	Unit #2 Loadouts	PM ₁₀	12.9	see SN-20
15	Unit #3 Receiving Pit	PM ₁₀	0.5	0.5
16	Unit #3 Upper Nuisance Dust Col	PM ₁₀	0.4	0.4
17	Unit #3 Cyclone	PM ₁₀	1.2	1.1
18	Unit #3 Scalper Aspiration Syst.	PM ₁₀	4.3	3.9
19	Unit #3 Dryer	PM ₁₀	7.3	14.5
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.6	2.6
		NO _x	0.7	3.2
20	Unit #3 Loadouts	PM ₁₀	3.3	2.1
21	Unit #1-#3 Trash Tank Loadout	PM ₁₀	1.5	4.0
22	Unit #4 Receiving Pit	PM ₁₀	0.6	see SN-15
23	Unit #4 Trash Tank Bin Vent	PM ₁₀	0.1	see SN-21
24	Unit #4 Trash Tank Loadout	PM ₁₀	0.1	see SN-21
25	Unit #4 Rolfes Trash Tank	PM ₁₀	0.5	see SN-21
26	Unit #4 Trash Tank Loadout	PM ₁₀	(R-5) Combined SN-26 with SN-25	

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SN	Description	Pollutant	lb/hr	tpy
27	Unit #4 Amarillo Dryer (#1 East) Column Dryer w/24 mesh screen having a 0.034 in sq opening	PM ₁₀	0.4	see SN-19
		SO ₂	0.1	
		VOC	0.1	
		CO	1.0	
		NO _x	1.2	
28	Unit #4 Amarillo Dryer (#3 West) Column Dryer w/24 mesh screen having a 0.034 in sq opening	PM ₁₀	0.4	see SN-19
		SO ₂	0.1	
		VOC	0.1	
		CO	1.0	
		NO _x	1.2	
29	Unit #4 Loadouts	PM ₁₀	5.2	see SN-20
30	Unit #5 Receiving Pit	PM ₁₀	0.5	see SN-15
31	Unit #5 Multi Clone	PM ₁₀	0.9	see SN-16
32	Unit #5 Scalper Aspiration Syst.	PM ₁₀	4.3	see SN-18
33	Unit #6 Receiving Pit	PM ₁₀	1.0	see SN-15
34	Unit #6 Multi Clone	PM ₁₀	1.7	see SN-17
35	Unit #5 Trash Tank	PM ₁₀	2.8	see SN-21
36	Unit #6 Upper Nuisance DC Syst	PM ₁₀	0.1	see SN-16
37	Unit #6 Lower Nuisance Dust Syst	PM ₁₀	0.7	see SN-17
38	Unit #6 Amarillo Dryer (#1 Middle) Column Dryer w/24 mesh screen having a 0.034 in sq opening	PM ₁₀	1.0	see SN-19
		SO ₂	0.1	
		VOC	0.1	
		CO	1.4	
		NO _x	1.6	
39	Unit #6 Amarillo Dryer (#2 East) Column Dryer w/24 mesh screen having a 0.034 in sq opening	PM ₁₀	1.0	see SN-19
		SO ₂	0.1	
		VOC	0.1	
		CO	1.4	
		NO _x	1.6	
40	Removed 6 March 1995.			
41	Unit #6 Baghouse	PM ₁₀	0.5	see SN-18

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SN	Description	Pollutant	lb/hr	tpy
42	Unit #6 Trash Tank	PM ₁₀	0.5	see SN-21
43	Unit #6 Loadout	PM ₁₀	7.8	see SN-20
44	Unit #6 Dryer (Shanzer) Column Dryer w/24 mesh column plate having a 0.81mm sq opening	PM ₁₀	1.2	see SN-19
		SO ₂	0.1	
		VOC	0.1	
		CO	1.5	
		NO _x	1.8	
45	ADM / Riceland Receiving Pit	PM ₁₀	2.1	see SN-15
46	ADM / Riceland Scalperator	PM ₁₀	1.9	see SN-18
47	ADM / Riceland Loadouts	PM ₁₀	1.0	see SN-20

2. Pursuant to §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, the permittee shall not exceed the emission rates set forth in the following table:

SN	Description	Pollutant	lb/hr	tpy
01	Unit #1 Receiving Pit	PM	1.9	see SN-15
02	Unit #1 Upper Nuisance DC	PM	1.3	see SN-16
03	Unit #1 Lower Nuisance DC	PM	1.6	see SN-17
04	Unit #1 Dryer (#1 East)	PM	1.4	see SN-19
05	Unit #1 Dryer (#2 West)	PM	18.1	see SN-19
06	Unit #1-#3 Trash Tank Bin Vent	PM	3.0	1.8
07	Unit #1 Loadouts (2)	PM	31.0	see SN-20
08	Unit #2 Receiving Pit	PM	3.8	see SN-15
09	Unit #2 HSC Baghouse	PM	0.5	see SN-16
10	Unit #2 Rolfes Baghouse	PM	0.2	see SN-17
11	Unit #2 Scalper Aspiration Syst.	PM	34.4	see SN-18
12	Unit #2 Dryer (#2 East)	PM	2.1	see SN-19
13	Unit #2 Dryer (#1 West)	PM	2.1	see SN-19
14	Unit #2 Loadouts	PM	51.6	see SN-20
15	Unit #3 Receiving Pit	PM	1.9	1.7

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SN	Description	Pollutant	lb/hr	tpy
16	Unit #3 Upper Nuisance Dust Col	PM	1.3	1.2
17	Unit #3 Cyclone	PM	4.7	4.3
18	Unit #3 Scalper Aspiration Syst.	PM	17.3	15.6
19	Unit #3 Dryer	PM	28.9	57.2
20	Unit #3 Loadouts	PM	12.9	8.2
21	Unit #1-#3 Trash Tank Loadout	PM	5.0	15.5
22	Unit #4 Receiving Pit	PM	2.5	see SN-15
23	Unit #4 Trash Tank Bin Vent	PM	0.3	see SN-21
24	Unit #4 Trash Tank Loadout	PM	0.7	see SN-21
25	Unit #4 Rolfes Trash Tank	PM	1.7	see SN-21
26	Unit #4 Trash Tank Loadout	PM	0.1	see SN-21
27	Unit #4 Dryer (#1 East)	PM	1.4	see SN-19
28	Unit #4 Dryer (#3 East)	PM	1.4	see SN-19
29	Unit #4 Loadouts	PM	20.6	see SN-20
30	Unit #5 Receiving Pit	PM	1.9	see SN-15
31	Unit #5 Multi Clone	PM	3.4	see SN-16
32	Unit #5 Scalper Aspiration Syst.	PM	17.2	see SN-18
33	Unit #6 Receiving Pit	PM	3.8	see SN-15
34	Unit #6 Multi Clone	PM	6.8	see SN-17
35	Unit #5 Trash Tank	PM	11.0	see SN-21
36	Unit #6 Upper Nuisance DC Syst	PM	0.2	see SN-16
37	Unit #6 Lower Nuisance Dust Syst	PM	2.6	see SN-17
38	Unit #6 Dryer (#1 Middle)	PM	3.4	see SN-19
39	Unit #6 Dryer (#2 East)	PM	3.4	see SN-19
41	Unit #6 Baghouse	PM	1.7	see SN-18
42	Unit #6 Trash Tank	PM	2.0	see SN-21
43	Unit #6 Loadout	PM	31.0	see SN-20
44	Unit #6 Dryer (Shanzer)	PM	4.4	see SN-19
45	ADM / Riceland Receiving Pit	PM	8.1	see SN-15
46	ADM / Riceland Scalperator	PM	7.4	see SN-18
47	ADM / Riceland Loadouts	PM	3.9	see SN-20

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3. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Opacity %	Regulatory Citation
01 thru 03	40%	19.503
04	20%	
05	40%	
06	20%	
07 thru 11	40%	
12, 13, 44	20%	NSPS 40 CFR 60 Subpart DD
14 thru 25	40%	19.503
26		Inactive
27, 28	20%	19.503
29 thru 32	40%	
33, 34	20%	
35	40%	
36 thru 39	20%	
40		Inactive
41 thru 43, 45 thru 47	20%	19.503

4. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall 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.
5. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.
6. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, natural gas is the only fuel to be used at the facility. The natural gas usage at this facility must not exceed 1,183,000 Mscf per rolling twelve month period.

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7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 190,000 tons of grain at the facility per consecutive 12 month period.

8. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall demonstrate compliance with Specific Condition #6 by one of the following methods:
 - a. Maintaining manufacturer data for each dryer's burner. These data shall:
 - i. Clearly state the maximum scf/hr of natural gas that can be fired in each dryer;
 - ii. Be made available to Department personnel upon request.
 - iii. Be maintained on or off site for the duration of this permit plus two years;
or

 - b. Maintaining records that record gas usage. These records shall:
 - i. Document the monthly receipts of natural gas;
 - ii. Document the twelve month rolling total for natural gas;
 - iii. Be maintained on or off site for a minimum of two years;
 - iv. Be made available to Department personnel upon request.

9. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #7. A record showing the twelve month rolling total and each individual month's data shall be kept on site, and made available to Department personnel upon request. These records must be updated by the fifteenth day of the month following the month to which the records pertain.

10. Pursuant to §19.304 of Regulation 19, the following sources are subject to the New Source Performance Standards (NSPS) of 40 CFR Part 60, Subpart DD -- Standards of Performance for Grain Elevators (See Appendix A):

SN	SN	SN
12	13	44

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11. Pursuant to §18.501 of Regulation No. 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 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 shall 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 shall 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 shall 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.

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SECTION V: INSIGNIFICANT ACTIVITIES

Phosphine gas is listed as a hazardous air pollutant, to fumigate stored grain products. The phosphine is generated from Phostoxin (aluminum phosphide) tablets and pellets that are placed in the stored grain. The plant uses approximately 270 pounds of Phostoxin which produced approximately 90 pounds of phosphine gas. Riceland requested that phosphine fumigation be considered an Insignificant Activity as per Reg. 19, Appendix A, Group A, Paragraph 13.

No other Insignificant activity determinations are presented based upon the information submitted by the permittee in an application dated October 6, 2000.

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix B, have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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SECTION VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit which 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 which 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. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall 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 thereunder.
3. Pursuant to §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, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
4. Pursuant to §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, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §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, records must be kept for two years which will 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 records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

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6. Pursuant to §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, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

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

7. Pursuant to §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, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §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, the permittee shall provide:
- 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. Pursuant to §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, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
10. Pursuant to §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, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and

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shall 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:

- 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 that all reasonable measures have been taken 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 shall 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, it need not be submitted again.
11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
- 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
 - e. To perform an operation and maintenance inspection of the permitted source

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12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued 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.
13. Pursuant to §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, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §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, this permit may be transferred. An applicant for a transfer shall 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. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.

APPENDIX A

APPENDIX B

APPENDIX C