STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0573-AOP-R21 AFIN: 70-00040

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

El Dorado Chemical Company
4500 North West Avenue
El Dorado, Arkansas 71730

3. PERMIT WRITER:

Shawn Hutchings

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Nitrogenous Fertilizer Manufacturing
NAICS Code: 325311

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
6/26/2018	AA	New Ammonium Nitrate Tank

6. REVIEWER'S NOTES:

El Dorado Chemical Company (EDCC) owns and operates a chemical manufacturing facility located at 4500 North West Avenue in El Dorado, Arkansas. The permit is an administrative amendment to add an 18,626 gallon ammonium nitrate tank to the insignificant activities list category B-21.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility currently has one active CAO due to the N_2O abator malfunction, and one pending due to excess emission from SN-09. The facility also has two pending CAOs one for emission testing failures and another for violations of NSPS Subpart H.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? Y
If yes, were GHG emission increases significant? N

b) Is the facility categorized as a major source for PSD? Y

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-41	PM_{10}	PSD
SN-49, SN-53, SN-54, SN-56, SN-57, & SN-61	SO_2 VOC CO NO_x GHG Opacity	PSD
SN-50	VOC CO GHG	PSD
SN-51	VOC CO GHG	PSD
SN-59	NO_x GHG Opacity	PSD
SN-61	NO_x	40 CFR Part 60, Subpart Db
SN-13	NO_x	40 CFR Part 60, Subpart G
SN-59	NO_x	40 CFR Part 60, Subpart Ga
SN-07	SO_2 and sulfuric acid mist	40 CFR Part 60, Subpart H
SN-65, 66, 68	There are no specific emission limits or pollutants identified, but the rules generally regulate HAPs	40 CFR Part 63, Subpart ZZZZ

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-48, SN49, SN-54, & SN-61		40 CFR Part 63, Subpart DDDDD
SN-25		40 CFR Part 63, Subpart CCCCCC
SN-65	CO, PM, NMHC + NOx	40 CFR Part 60, Subpart IIII
SN-66 and 68	CO, VOC, NOx	40 CFR Part 60, Subpart JJJJ

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N
(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N
If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
None requested.		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

Include the results for any ambient air evaluations or modeling. Include NSR/PSD permits and permits that require an evaluation in accordance with revisions to the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

a) Reserved.

b) Non-Criteria Pollutants:

The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Ammonia	17	3.5	1,840.4	No

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Ammonia	173	129	Y

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
05A and B	Vendor Specification	PM_{10} – 0.085 mg/acf	Brinks Scrubber	-	-
	Engineering Estimate	0.8 lb/hr NH_3	Brinks Scrubber	99.5%	-
07	NSPS limit	SO_2 – 92.0 lb/hr	Brinks Mist Eliminator	-	Remain the previous permitted limit
	Testing	H_2SO_4 – 0.123 lb/ton	Brinks Mist Eliminator	-	-
08	Testing	NO_X - 52.2 lb/hr	Refrigeration SCR	-98.5%	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		Ammonia – 40.0 lb/hr			
09	Testing	NO_X - 52.2 lb/hr Ammonia – 40.0 lb/hr	Refrigeration SCR	-98.5%	-
10	AP-42	NO_X - 10.0 lb/ton	best operation	-	-
	Highest lb/hr from Stack Test results of 2001-2004	HNO_3 – 0.389 x 1.25 x 40/8.5 = 2.3 lb/hr +1.1 lb/hr from car barn NO_X - 3.3 x 1.25 x 40/8.5 = 19.5 lb/hr	-	-	Maximum nitric acid production rate is 8.5 tons/hr, and maximum nitric acid blend production is 40 tons/hr. Stack test + 25% safety factor.
13	NSPS	3.0 lb/ton of acid	refrigerated absorption	-	-
18	Process Knowledge	PM_{10} – 0.033 lb/ton	Baghouse	-	-
19	PM – 50,556 scfm x 011677 lb/mmft^3 x 60 min/hr x 1.2 NH_3 - 50,556 scfm x 25 ppm x 17.1 lb/lb-mol x lb-mol/385.2 ft^3 60min/hr x 1.2	-	-	-	
25	TANKS 4.0.9	VOC	none	-	-
26	TANKS 4.0.9	NH_3	none	-	-
27	Testing	PM 4.8E-7 lb/ton	none	-	-
28	Testing	PM 4.8E-7 lb/ton	none	-	-

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
30	AP-42 Section 5.2	H_2SO_4 – 0.0034 lb/1000 gallons	none	-	-
31	SOCMI	NH_3 – 0.5 lb/hr	none	-	-
32	SOCMI	NH_3 – 1.6 lb/hr	none	-	-
33	Process Knowledge	NO_X – 0.1 lb/hr	none	-	-
	Process Knowledge	HNO_3 – 0.1 lb/hr	none	-	-
34	Process Knowledge	PM_{10} – 0.7 lb/ton x 1.46 ton/hr	none	-	-
35A	Testing	PM_{10} – 0.1 lb/hr	baghouse	99%	-
35B	AP-42	PM 19.7 lb/hr	none		
38	EF_{PM} = Total liquid drift (lb/1000 gal) x TDS Fraction (ppm) = 0.0834 lb/1000 gal x 1,560 ppm PM10 = EF_{PM} x flowrate = 9,000 gpm x EF_{PM}			-	
40	TANKS Program	NH_3 – 0.22lb/hr			-
41	Stack testing	NH_3 – 10.0 lb/hr PM/PM10 – 4 lb/hr	Chemical steam scrubber	-	24-hr BACT limit is 13.8 lb/hr 30-day rolling BACT limit is 3.4 lb/hr
44	Mass Balance for sulfur oxides and sulfuric acid.	Scrubber	-	-	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	Stack test from similar plant plus a safety factor of 25%.				
46	0.00013 lb/1000 gal	-	-	0.001% is design drift loss percent provided by manufacturer.	
13	NSPS EPA/DOJ Vendor Info	NO_2 (3-hr): 3.0 lb/ton NO_2 (3-hr): 1.0 lb/ton (excluding SSM) NO_2 (rolling 365-days): 0.6 lb/ton NH_3: 20 ppm	SCR	95%	After installation of SCR and Tail gas preheater
65 and 66, 68	AP-42 or NSPS	varied	none	--	
67	AP-42	0.02 lb/ton	None		
14 and 21	Vendor Specification	0.085 mg/acf PM	Scrubber	99.5 for ammonia	
59	BACT limits Testing	Varied	SCR and Tertiary abator		

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
10	NOx	7E	Every five years	Necessary for efficiency check

SN	Pollutants	Test Method	Test Interval	Justification
				on Venturi & Packed Tower Scrubber
10	HNO_3	Approved method	Every five years	Necessary for efficiency check on Venturi & Packed Tower Scrubber
07	SO_2	6C	Initial performance test	NSPS Requirement
05A and B	PM_{10}	Approved method	Initial and alternating annually.	Necessary to prove that PSD has not been triggered.
14, & 21	PM, PM_{10}, $PM_{2.5}$	Method 5 or 201A, and 202	Annually until 2 consecutive passes, then once every 5 years	Necessary to prove that PSD has not been triggered.
21	NH_3	Approved method	Annually until 3 consecutive passes, then once every 3 years	Necessary to prove adherence to the non-criteria pollutant strategy.
44	SO_3 NO_x H_2SO_4 HNO_3	Approved method	Every five years	Necessary to prove adherence to the non-criteria pollutant strategy.
08 & 09	NH_3	CTM-027 or equivalent	Every five years	Verify emissions
59	NH_3	CTM-027 or equivalent	Annually until 2 consecutive passes, then once every 5 years	Necessary to prove adherence to the non-criteria pollutant strategy.
49	PM PM_{10} $PM_{2.5}$ SO_2 VOC CH_4	Method 5 & 202 Method 201A & Method 202 Method 6C Method 25A Method 18	Annually until 2 consecutive passes, then once every 5 years	Verify emissions

SN	Pollutants	Test Method	Test Interval	Justification
	CO CO_2 N_2O	Method 10 Method 3A Method 320, ASTM D6348-03 or other approved method		
50	VOC CO_2	25A 3A	One Time Test	Verify emissions
50	Methanol	18 or 25A	Annually until 2 consecutive passes, then once every 5 years	Verify emissions
51	VOC Pre and Post Control CO NH_3	25A 10 320	One Time Test	Verify emissions
51	Methanol CO_2	18 or 25A 3A	Annually until 2 consecutive passes, then once every 5 years	Verify emissions
61	PM PM_{10} $PM_{2.5}$ SO_2 VOC CO NO_x	Method 5 & 202 Method 201A & Method 202 6C 25A 10 7E	Annually until 2 consecutive passes, then once every 5 years	Verify emissions
13	NH_3	CTM-027 or equivalent	Annually until 2 consecutive passes, then once every 5 years	Necessary to prove adherence to the non-criteria pollutant strategy.

15. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
13	NO_x	CEM	Continuously	Y
07	SO_2 emission rate	CEM	Continuously	Y
08 & 09	NO_x	CEM	Continuously	Y
41 and 63	Ammonia and particulate emission rates	Daily sampling consisting of two 12-hour composite sample	Continuously	Y
59	NO_x and N_2O	CEM	Continuously	Y
49	NO_x	CEM	Continuously	Y

16. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
08 & 09	weak nitric acid production	304,775 tons/12 months	Monthly	Y
13	weak nitric acid production	140,000 tons/12 months	Monthly	Y
38, 46, 52, 60	Total Dissolve solid	1,560 ppm	Weekly	N
59	weak nitric acid production	461,725 tons/12 months	Monthly	Y
47	strong nitric acid production	5.2 tons per hour	Hourly	Y
47	strong nitric acid production	45,625 tons/12 months	Monthly	Y
10	Scrubber parameter	hydrogen peroxide concentration	Daily	N
07	Sulfuric acid production	200,750 ton/12 months	Monthly	Y
	Sulfuric acid production	550 tons of 100% sulfuric acid per day	Daily	Y
	Sulfuric acid emission limit	4.0 lb of SO_2 per ton of acid production, expressed as	Continuously and averaged every 3-hours	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		100% H_2SO_4, and based on a 3-hr average.		
	Annual SO_2 Emissions (tpy on a calendar basis)	N/A	Annually	N
30	Sulfuric acid shipped	200,750 tons/12 months	Monthly	Y
All E2 Plant	Production	525,600 tons/12 months	Monthly	Y
05A and B	Scrubber liquid flow rate for each scrubber Gas pressure drop across unit Scrubber liquid pH	225 gal/min (minimum) 2.5 in. H_2O (minimum) 0.5 – 6.0	Daily	N
41	BACT Limit PM	24-hour Average 0.223 lb/ton	Daily	Y
		30-day Average 0.054 lb/ton	Monthly	Y
All KT plant	Production	394,200 tons/12 months	Monthly	Y
14	Scrubber liquid flow rate Gas Pressure Drop Across Unit pH Exhaust Flow Rate	225 gal/min (minimum) 2.5 in H_2O (minimum) 0.5 – 6.0 131,452 acfm (maximum)	Daily	N
18	Baghouse Pressure Drop	0.5 – 8.0 in H_2O	Daily	N
21	Scrubber liquid flow rate Gas Pressure Drop Across	225 gal/min (minimum) 2.5 in H_2O	Daily	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Unit pH Exhaust Flow Rate	(minimum) 0.5 – 6.0 131,452 acfm (maximum)		
63	PM emissions	24-hour Average 0.223 lb/ton	Daily	Y
		30-day Average 0.054 lb/ton	Monthly	Y
	AN Production	547,500 tons/12 months	Monthly	Y
49	NH_3 production	565,750 tons/12 months	Monthly	Y
	Natural gas usage	7,076.7 MMscf per 12 months	Monthly	Y
53	Natural gas usage	9.0 MMscf per 12 months	Monthly	Y
	Hours of operation	No more than 3 hours during any 24-hour period unless HRU outage	Daily	Y
51	Scrubber parameters	30 gpm 2 in H_2O	Daily	N
56	Natural gas usage	8.2 MMscf per 12 months	Monthly	Y
57	Natural gas usage	1.5 MMscf per 12 months	Monthly	Y
54	Natural gas usage	18.63 MMscf per 12 months	Monthly	Y
53, 56, 57	Flare maintenance	No limit	As required	Y
44	Amount of Oleum offload into the storage tank Percent strength of the Oleum Amount of mixed acid produced.	394,000 tons 30% 219,000 tons	Monthly	N
44	Scrubber liquid flow rate for each	5.0 gal/min (minimum)	Daily	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	scrubber Gas pressure drop across unit Scrubber liquid pH	10 – 35 in. H_2O 0.5 – 7.5		
25	usage of gasoline	40,000 gallons/12 months	Monthly	Y
29	Nitric Acid Shipped	250,000 tons/12 months	Monthly	Y
40	AN Loading tonnage	65,000,000 tons/12 months	Monthly	Y
58	Ammonia Loading	226,300 tons/12 months	Monthly	Y
65 and 66 68	Hours of operation	100 hours per calendar year 500 hours	Monthly	Y
65 and 66	Engine maintenance	Change oil and filter every 500 hours of operation, or annually, whichever comes first; Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	As needed	N
67	Prills Unloaded	36,500 tons per 12 months	Monthly	Y
61	NSPS Db records	No specific limits	Monthly	Y

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
08 & 09	10%	Compliance assurance for SCR operation	Daily Observation
07 & 13	10%	NSPS limit	Daily Observation
54, 61	0%	BACT limit	Natural Gas Combustion
49, 59	0%	BACT limit	Daily Observation
53, 56, 57	0%	BACT limit	Natural Gas Combustion
05A and B, 18, 35A, 41, 47, 63	5%	Department Guidance	Weekly Observation
52, 60	5%	Department Guidance	Weekly TDS
21, 27, 28	10%	Department Guidance	Daily Observation
14, 19	15%	Department Guidance	Daily Observation
34, 44	20%	Previous permit	Daily Observation
10, 38, 46	20%	Department Guidance	Weekly TDS
35B & 67	20%	Department Guidance	-
65	20%	Department Guidance	Annual Observation
66	5%	Department Guidance	Annual Observation
68	5%	Department Guidance	Natural gas or propane combustion

18. DELETED CONDITIONS:

Former SC	Justification for removal
No conditions were removed.	

19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

20.

Source Name	Group A Category	Emissions (tpy)								
		PM/PM_{10}	SO_2	VOC	CO	NO_x	H_2S	NH_3	HAPs	
									Single	Total
Molten Sulfur Storage Tank (formerly SN-23)	B-21								0.001	0.001

Diesel Storage Tank (500 Gallon) (formerly SN-24)	A-3			0.001					0.002	0.002
Diesel Storage Tank (2,000 Gallon) (formerly SN-45)	A-3			0.002					0.003	0.003
Total	**A-3**			0.003						
Partwashers	A-13			2.11						
2 x Ammonia Flares	A-13	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01
Sulfur Unloading/Storage	A-13						0.13			
Ammonia Offloading	A-13							0.44		
Tier 2 Warehouse	A-13	0.02								
Natural Gas Pipeline Knockout Pot	A-13			0.14						
Portable Cooling Tower	A-13	0.043								
E2 Prill Warehouse	A-13	1.03								
Total	**A-13**	**5.49**	**0.01**	**2.26**	**0.01**	**0.01**	**0.13**	**0.54**	**0.01**	**0.01**
Sulfuric Acid Solution Storage Tanks	B-21									
Ammonium Nitrate Tank	B-21									

21. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0573-AOP-R20

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

El Dorado Chemical Company
Permit #: 0573-AOP-R21
AFIN: 70-00040

$/ton factor	23.93	Annual Chargeable Emissions (tpy)	2160.44
Permit Type	Modification	Permit Fee $	1000

Minor Modification Fee $	500
Minimum Modification Fee $	1000
Renewal with Minor Modification $	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	☐
If Hold Active Permit, Amt of Last Annual Air Permit Invoice $	0
Total Permit Fee Chargeable Emissions (tpy)	0
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM: *Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

Air Contaminants: *All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		122.2	122.2	0	0	122.2
PM_{10}		101.8	101.8	0		
$PM_{2.5}$		95.7	95.7	0		
SO_2		403.5	403.5	0	0	403.5
VOC		40.4	40.4	0	0	40.4
CO		157.7	157.7	0		
NO_X		783	783	0	0	783
CO2e	☐	1293490	1293490	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Lead	☐	0.06	0.06	0		
Arsenic*	☐	0.06	0.06	0		
Cadmium*	☐	0.06	0.06	0		
Formaldehyde*	☐	0.39	0.39	0		
Hexane*	☐	8.32	8.32	0		
Mercury	☑	0.06	0.06	0	0	0.06
Methanol*	☐	28.21	28.21	0		
NH3**	☑	786.7	786.7	0	0	786.7
H2SO4**	☑	12.63	12.63	0	0	12.63
HNO3**	☑	11.95	11.95	0	0	11.95
HAPs	☐	0.03	0.03	0		
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	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
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	☐	0	0	0		
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	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
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	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
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Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
	☐	0	0	0		
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