

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 0573-AOP-R9

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

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

3. PERMIT WRITER:

Siew Low

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Nitrogenous Fertilizers Manufacturing; All Other Basic Inorganic
Chemical Manufacturing
NAICS Code: 325311; 325188

5. SUBMITTALS: September 11, 2008 and September 22, 2008

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. This minor modification authorizes the installation of the sulfuric acid cooling tower (SN-46). This mechanically induced, cross-flow draft cooling tower is an integral part of the double absorption process required by CAO LIS 03-175 (December 31, 2003). The potential emissions increase from this modification is 0.7 tpy of PM/PM₁₀.

7. COMPLIANCE STATUS: The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues.

Last date of inspection was July 18, 2008. The facility was found out of compliance because excessive CEMs downtime at SN-08 and SN-09.

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8. APPLICABLE REGULATIONS:

A. Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera) (Y/N) Y

Has this facility underwent PSD review in the past (Y/N) Y Permit # 0573-AOP-R6

Is this facility categorized as a major source for PSD? (Y/N) Y

≥ 100 tpy and on the list of 28 (100 tpy)? (Y/N) Y

≥ 250 tpy all other (Y/N) _____

B. PSD Netting

Was netting performed to avoid PSD review in this permit? (Y/N) N

C. Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
SN-13	NO _x	NSPS Subpart G
SN-41	PM ₁₀	PSD
SN-07	SO ₂ and sulfuric acid mist	NSPS Subpart H

9. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

10. MODELING:

A. Criteria Pollutants

Pollutant	Emission Rate (lb/hr)	NAAQS Standard (µg/m ³)	Averaging Time	Highest Concentration (µg/m ³)	% of NAAQS
PM ₁₀	161.6	50	Annual	32.0*	64%
		150	24-hour	91.4*	60.9%

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Pollutant	Emission Rate (lb/hr)	NAAQS Standard ($\mu\text{g}/\text{m}^3$)	Averaging Time	Highest Concentration ($\mu\text{g}/\text{m}^3$)	% of NAAQS
SO ₂	601.7	80	Annual	12.5	15%
		1,300	3-hour	444	34%
		365	24-hour	119	32%
NO _x	592.2	100	Annual	13.97	19%
VOC	18.5	0.12	1-hour (ppm)	NA	0%
CO	12.0	10,000	8-hour	NA	0%
		40,000	1-hour	NA	0%

* - Background (24 $\mu\text{g}/\text{m}^3$ for annual average, 39 $\mu\text{g}/\text{m}^3$ for 24-hour average) are included to the modeled concentration.

B. Non-Criteria Pollutants

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The PAER was deemed by the Department 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?
HNO ₃	5.15	0.5665	16.8	No
H ₂ SO ₄	0.2	0.022	4.72	No
NH ₃	17.41	1.915	168.8	No
Hexane	1762	193	0.6	Yes

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.

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Pollutant	PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass ?
HNO ₃	51.5	4.8	Yes
H ₂ SO ₄	2	0.95	Yes
NH ₃	174.1	56.2	Yes

11. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
SN-05	Testing	PM ₁₀ – 13.0 lb/hr, 0.96 lb of PM ₁₀ per ton of ammonium nitrate produced. With SN-17's exhaust routed to SN-05 21.6 lb/hr x (1-0.95) =1.1 lb/hr PM	Brinks Scrubber	-	97% particulate control efficiency. 95% particulate control efficiency is used in calculations as Brinks scrubber control efficiencies for the exhaust from SN-17 passing thru Brinks scrubber.
SN-05	Engineering Estimate	3.5 +5.0 = 8.5 lb/hr NH ₃	Brinks Scrubber	-	-
SN-06	Testing	PM ₁₀ – 67.0 lb/hr, 0.96 lb of PM ₁₀ per ton of ammonium nitrate produced.	-	-	Uncontrolled. Maximum prill production rate is 54 tons/hour.
			Brinks Mist		Remain the

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SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
SN-07	Testing	SO ₂ – 600 lb/hr	Eliminator	-	previous permitted limit
SN-07	Testing	H ₂ SO ₄ – 0.123 lb/ton	Brinks Mist Eliminator	-	-
SN-08	Testing	NO _x - 200.1 lb/hr Ammonia – 40.0 lb/hr	Refrigeration SCR	-98.5%	11.5 lb/ton x 17.4 ton/hr = 200.1 lb/hr
SN-09	Testing	NO _x - 200.1 lb/hr Ammonia – 40.0 lb/hr	Refrigeration SCR	-98.5%	11.5 lb/ton x 17.4 ton/hr = 200.1 lb/hr
SN-10	AP-42	NO _x - 10.0 lb/ton	best operation	-	-
SN-10	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.
SN-13	NSPS	3.0 lb/ton of acid	refrigerated absorption	-	-
SN-14	Testing	PM ₁₀ - 44.2 lb/hr	none	-	Hourly emission rate increase as a result of a fail stack testing. 44.2 lb/hr is based on March 2, 2004 stack test

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SN	Emission Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
					data. Average + Std. Deviation = 36.18 + 8.0
SN-15	Testing	PM ₁₀ – 17.0 lb/hr	none	-	-
SN-15	Testing	NH ₃ – 18.0 lb/hr	none	-	-
SN-16A	AP-42	PM ₁₀ – 7.6 lb/MMSCF SO ₂ – 0.6 lb/MMSCF VOC – 5.5 lb/MMSCF CO – 84 lb/MMSCF NO _x - 280 lb/MMSCF	none	-	-
SN-16B	AP-42	PM ₁₀ – 7.6 lb/MMSCF SO ₂ – 0.6 lb/MMSCF VOC – 5.5 lb/MMSCF CO – 84 lb/MMSCF NO _x - 280 lb/MMSCF	none	-	-
SN-17	Testing	PM ₁₀ – 21.6 lb/hr	Pease-Anthony Scrubber	-	Routed to SN-05
SN-17	Testing	NH ₃ – 5.0 lb/hr	Pease-Anthony Scrubber	-	Routed to SN-05
SN-18	Process Knowledge	PM ₁₀ – 0.033 lb/ton	Baghouse	-	-
SN-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	-	-	-

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SN	Emission Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
SN-21	Testing	PM ₁₀ – 0.1 lb/ton	Brinks Scrubber	-	-
SN-21	Testing	NH ₃ – 1.0 lb/ton	Brinks Scrubber	-	-
SN-22	CEM	NO _x - 3.0 lb/ton	cryogenic absorption	-	-
SN-22	Process Knowledge	HNO ₃ – 10.0 lb/hr	cryogenic absorption	-	-
SN-25	TANKS3	VOC	none	-	-
SN-26	TANKS3	NH ₃	none	-	-
SN-27	AP-42	PM ₁₀ – 0.0001 lb/ton	none	-	-
SN-28	AP-42	PM ₁₀ – 0.0001 lb/ton	none	-	-
SN-29	AP-42	HNO ₃ – 0.53 lb/1000 gallons	none	-	-
SN-30	AP-42 Section 5.2	H ₂ SO ₄ – 0.0281 lb/1000 gallons	none	-	L _L = 12.46 x SPM/T =12.46 x 1.45 x 0.01 x 98.06/630
SN-31	SOCMI	NH ₃ – 0.5 lb/hr	none	-	-
SN-32	SOCMI	NH ₃ – 1.3 lb/hr	none	-	-
SN-33	Process Knowledge	NO _x – 1.9 lb/hr	none	-	-
SN-33	Process Knowledge	HNO ₃ – 1.8 lb/hr	none	-	-

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
SN-34	Process Knowledge	PM ₁₀ – 0.7 lb/ton x 1.16 ton/hr	none	-	-
SN-35	Process Knowledge	PM ₁₀ – 2.0 lb/hr	baghouse	99%	-
SN-38	EF _{PM} = Total liquid drift (lb/1000 gal) x TDS Fraction (ppm) = 1.7 lb/1000 gal x 1,560 ppm PM ₁₀ = EF _{PM} x flowrate = 9,000 gpm x EF _{PM}				0.17 lb/1000 gal is design drift loss percent provided by AP-42. Table 13.4-1
SN-39	EF _{PM} = Total liquid drift (lb/1000 gal) x TDS Fraction (ppm) = 1.7 lb/1000 gal x 1,560 ppm PM ₁₀ = EF _{PM} x flowrate = 14,000 gpm x EF _{PM}				1.7 lb/1000 gal is design drift loss percent provided by AP-42. Table 13.4-1
SN-40	Engineering estimate	NH ₃ – 1.6 lb/hr during loading			1.6 lb/hr per truck x 2 trucks per day
SN-41	Stack testing	NH ₃ – 10.0 lb/hr PM/PM ₁₀ – 3.3 lb/hr	Chemical steam scrubber	-	-
SN-42	EF _{PM} = Total liquid drift (lb/1000 gal) x TDS Fraction (ppm) = 0.17 lb/1000 gal x 1,560 ppm PM ₁₀ = EF _{PM} x flowrate = 16,000 gpm x EF _{PM}		-	-	0.17 lb/1000 gal is design drift loss percent provided by manufacturer.
SN-43	EF _{PM} = Total liquid drift (lb/1000 gal) x TDS Fraction (ppm) = 1.7 lb/1000 gal x 1,560 ppm PM ₁₀ = EF _{PM} x flowrate = 2,000 gpm x EF _{PM}				1.7 lb/1000 gal is design drift loss percent provided by AP-42. Table 13.4-1
SN-44	Mass Balance for sulfur oxides and sulfuric acid. Stack test from similar plant plus a		Scrubber	-	-

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SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
	safety factor of 25%.				
SN-46	3000 gpm x 0.000064 x 1,560 ppm = 0.2 lb/hr PM ₁₀	-	-	-	0.0064% is design drift loss percent provided by manufacturer.

13. TESTING REQUIREMENTS:

This permit requires stack testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
SN-10	NO _x	7E	Every five years	Necessary for efficiency check on Venturi & Packed Tower Scrubber
SN-10	HNO ₃	approved method	Every five years	Necessary for efficiency check on Venturi & Packed Tower Scrubber
SN-07	SO ₂	6C	Initial performance test	NSPS Requirement
SN-05	PM ₁₀	approved method	Every five years to do an analysis. See Specific Condition 64.	Necessary to prove that PSD has not been triggered.
SN-17	NH ₃	Approved Method	Every five years or upon failure, pass two consecutive stack testings to go back to the five years cycle.	Necessary to prove that PSD has not been triggered.
SN-15, SN-14, and SN-21	PM ₁₀	Modified 5	Every five years	Necessary to prove that PSD has not been triggered.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
SN-15	NH ₃	approved method	Yearly	Necessary to prove adherence to the non-criteria pollutant strategy.
SN-21	NH ₃	approved method	Every five years	Necessary to prove adherence to the non-criteria pollutant strategy.
SN-44	SO ₂ NO _x H ₂ SO ₄ HNO ₃	approved method	Every five years	Necessary to prove adherence to the non-criteria pollutant strategy.
SN-08 and SN-09	NH ₃	CTM-027	Every five years	Verify emissions

14. MONITORING OR CEMS

The following are parameters that must be monitored with CEMs or other monitoring equipment (temperature, pressure differential, etc), frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Parameter or Pollutant to be Monitored	Method of Monitoring (CEM, Pressure Gauge, etc)	Frequency*	Report (Y/N)**
SN-13, SN- 22	NOx emission rate	CEM	Continuously	Y
SN-07	SO ₂ emission rate	CEM	Continuously	Y
SN-08, SN-09	NOx emission rate	CEM	Continuously	Y
SN-41	Ammonia and particulate emission rates	Daily two 12-hour composite sample	Continuously	Y

* Indicate frequency of recording required for the parameter (Continuously, hourly, daily, etc.)

** Indicates whether the parameter needs to be included in reports.

15. RECORD KEEPING REQUIREMENTS

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
SN-08	weak nitric acid production	304,775 tons/12 months	monthly	Y
SN-09				
SN-13	weak nitric acid production	140,000 tons/12 months	monthly	Y
SN-22	concentrated nitric acid production	SN-22 - 118,260 tons/12 months;	monthly	Y
SN-10 Facility				
SN-10	Scrubber parameter	hydrogen peroxide concentration	daily	N
SN-29	nitric acid shipped	200,000 tons/12 months	monthly	Y
SN-07	Sulfuric acid production	200,750 ton/12 months		
SN-30	sulfuric acid shipped	200,750 tons/12 months	monthly	Y
All E2 Plant	Production	473,040 tons/12 months	Monthly	Y
SN-05	Scrubber liquid flow rate for each scrubber Gas pressure drop across unit Scrubber liquid pH	225 gal/min (minimum) 2.5 in. H ₂ O (minimum) 0.5 – 4.5	daily	N
SN-17	Scrubber liquid flow rate (dual scrubber) pH Amperage	120 gal/min (minimum) 0.5 – 6.0 100 amp (minimum)	daily	N
All KT plant	production	252,000 tons/12 months	monthly	Y
SN-25	usage of gasoline	40,000 gallons/12 months	monthly	Y
SN-37	minimum gas pressure	10 in. H ₂ O (minimum)	When scrubber in operation	N

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SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
SN-38	Total Dissolve solid	1,560 ppm	weekly	N
SN-39	Total Dissolve solid	900 ppm	weekly	N
SN-40	Loading tonnage	no more than 468,660 tons	monthly	N
SN-42	Total Dissolve solid	1,560 ppm	weekly	N
SN-43	Total Dissolve solid	1,560 ppm	weekly	N
SN-46	Total Dissolve solid	1,560 ppm	weekly	N
SN-44	Amount of Oleum offload into the storage tank	394,000 tons	monthly	N
	Percent strength of the Oleum	65%		
	Amount of mixed acid produced.	219,000 tons		

* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

** Indicates whether the item needs to be included in reports

16. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
SN-08 SN-09	10%	Compliance assurance for SCR operation	daily observation
SN-13	10%	NSPS limit	daily observation
SN-10	20%	Previous permit	daily observation
SN-01A SN-01B	10%	Previous permit	daily observation
SN-07	10%	Previous permit	daily observation
SN-12 SN-18	5%	Department Guidance	daily observation
SN-21	10%	Previous permit	daily observation
SN-14	15%	Previous permit	daily observation
SN-05 SN-11 SN-15	20%	Previous permit	daily observation
SN-06 SN-27	25%	Previous permit	daily observation

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SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
SN-28			
SN-41	15%	Department Guidance	daily observation

17. DELETED CONDITIONS:

The following Specific Conditions were included in the previous permit, but deleted for the current permitting action.

Former SC	Justification for removal
None	N/A

18. GROUP A INSIGNIFICANT ACTIVITIES.

No insignificant activities are included in this modification.

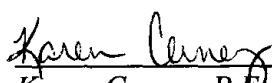
19. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

List all active permits for this facility which are voided/superseded/subsumed by issuance of this permit.

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20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:



Karen Cerney, P.E.

Fee Calculation for Major Source

Facility Name: El Dorado Chemical Company
 Permit Number: 573-AOP-R9
 AFIN: 70-00040

\$/ton factor	20.96	Annual Chargeable Emission (tpy)	<u>3679.75</u>
Permit Type	Minor Mod	Permit Fee \$	<u>500</u>

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM	<input checked="" type="checkbox"/>	333.3	334	0.7		
PM ₁₀	<input type="checkbox"/>	333.3	334	0.7		
SO ₂	<input checked="" type="checkbox"/>	411.3	408.3	-3		
VOC	<input checked="" type="checkbox"/>	4.5	4.5	0		
CO	<input type="checkbox"/>	52.3	52.3	0		
NO _x	<input checked="" type="checkbox"/>	2410.2	2410.2	0		
H ₂ SO ₄	<input checked="" type="checkbox"/>	19.15	19.15	0		
NH ₃	<input checked="" type="checkbox"/>	434	434.8	0.8		
HNO ₃	<input checked="" type="checkbox"/>	67.6	67.6	0		
Hexane	<input checked="" type="checkbox"/>	1.2	1.2	0		
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