

# ADEQ MINOR SOURCE AIR PERMIT

Permit #: 604-AR-8

IS ISSUED TO:

Busch Agricultural Resources  
3723 CR 905 - Highway 49 N at Farville  
Jonesboro , AR 72401-0749  
Craighead County  
AFIN: 16-00104

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:

---

**SECTION I: FACILITY INFORMATION**

PERMITTEE: Busch Agricultural Resources  
CSN: 160104  
PERMIT NUMBER: 604-AR-8

FACILITY ADDRESS: 3723 CR 905 - Highway 49 N at Farville  
Jonesboro , AR 72401-0749

COUNTY: Craighead

CONTACT POSITION: Kirby J. Kraft  
TELEPHONE NUMBER: (314) 909-3935

REVIEWING ENGINEER: Jim Siganos

UTM North-South (Y): Zone 15 [3974]  
UTM East-West (X): Zone 15 [ 718]

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

## **SECTION II: INTRODUCTION**

### **Summary**

Busch Agricultural Resources, Inc. (BARI), a subsidiary of Anheuser-Busch Companies, Inc., operates a rice milling and storage facility near Jonesboro in Craighead County. This facility handles up to 22,300,000 bushels (500,000 tons) of rice per year, and has the capability of processing 60 tons/hour of rough rice.

Due to unusually heavy insect activity the mill proposes to increase the yearly use of methyl bromide for pest control fumigation. Non-stack emissions of the fumigant methyl bromide will be increased from 3 tons per year to 5 tons per year. However, the hourly emission rate (lbs/hr) will not change.

The mill will perform up to three (3) fumigations per year, i.e., during spring, summer and fall seasons, depending upon milling needs.

### **Process Description**

The Jonesboro Rice Mill stores enough rice to supply the facility during production. The facility is projected to handle up to 22,300,000 bushels of rice per year beginning in 2002. Included is a very small amount of green rice that is dried at the facility. Dried rice or green rice is received at the facility by trucks. The trucks unload the rice into an 11 foot by 12 foot receiving pit at up to 10,000 bushels per hour. Various conveyors and bucket elevators transfer the green rice to the small rice bins for drying. All rice is transferred via the scalpers (SN-02) to storage bins. All rice received is conveyed through one of three scalperators. A rotating wire mesh drum removes any large particles of trash and an internal fan system removes any airborne dust in the rice.

At the small rice bins, each of ten bins is filled with about 18,000 bushels of green or dry rice. The green rice (rarely received) is dried to about 15 percent moisture. Two 18,000 cfm fans supply warm air at about 100°F during the 10 day average drying cycle. A large stirrer in each bin slowly agitates the rice to provide more uniform drying. If dried rice is stored in the bins, it would be aerated with ambient air using one fan.

At the large rice bins, dried rice up to the 120,000 bushel bin capacity enters one of four bins from either the small rice bins or the scalpers. Dried rice is stored until transferred to a Rice Mill Day Tank (SN-31). On occasion, dried rice is loaded into trucks for shipment. During storage, which averages 20 days, the rice is periodically aerated with ambient air using two 6150 cfm fans. The intermediate storage bins store rice from the scalpers. The storage process is identical to that of the large rice bins.

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

As required for shipment, dried rice is transferred from a storage bin to the truck loadout via the various conveyors at up to 6000 bushels per hour. The loadout consists of an inclined 10 inch diameter pipe through which dried rice flows by gravity. A “sock” encloses the end of the pipe to minimize dust as the dried rice drops into a truck.

The facility uses a trash removal system to collect large field trash from the screen machine. The screen machine separates the wastes from the small surge bin into three streams. The largest size (<20 mesh) wastes go to trash removal, while the mid-size (20 to 80 mesh) wastes are pneumatically conveyed via the rough Hull Transfer (SN-12) to the Unground Hull Bin (SN-12, 73 & 74). Most of the hulls from SN-74 are transported via three screw/drag conveyors, a surge bin, a magnet, and one bucket elevator to be ground in one of two hammer mills. The smallest size (>80 mesh) wastes are pneumatically conveyed via the Rough Rice Dust Transfer (SN-13) to the Bran Receiver.

Milled rice is loaded into trucks or covered rail cars. Trucks are loaded inside a two wall shed. Rail cars are loaded in a semi-protected area having a roof and one wall. Since milled rice is virtually dust free and abrades very little in conveying, small amounts of emissions are generated. Up to two percent of the milled rice is bagged. This small operation generates essentially no emissions.

By-products (bran and hulls) are loaded into trucks or covered rail cars inside the by-product shipping building. For trucks, a vertically moving hood encloses the top of the truck trailer during loadout. Air is drawn into the hood and collects the generated dust in a fabric filter. For rail cars, three flexible spouts are lowered into the car during loadout for dust pickup. Air is drawn into the spouts and collects the adjacent dust in the same fabric filter. Air can be drawn from either the truck hood or the rail car spouts but not both. Rail cars and trucks cannot be filled simultaneously. Other processes at the facility include shelling, grading, screening, sorting, and pearling.

The mill has two large dust control systems which are connected to Fabric Filters C-31 and C-32. These systems have a dual function in that they control the dust emissions in the mill and they collect the bran by-product. The dust and bran are combined and pneumatically transferred via filter receiver to one of four bran by-product storage bins. Except for the milled rice transfer, each elevator connects to both dust systems, one at the head and the other at the boot. Thus, their uncontrolled emissions are being split between the dual systems.

Generally, the equipment is enclosed to minimize fugitive emissions. Inside the building, the equipment fugitive emissions settle and remain inside. This solid material is then swept up or vacuumed up (Vacuum Cleaning System). Most pieces of equipment are connected directly to a dust collection system. Equipment with low dust potential does have a direct connection. However, the dust vents via the adjacent conveyor or elevator are connected to a dust system.

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

Equipment used to handle the milled rice products is not connected to a dust system as the milled rice generates essentially no particulate emissions.

Based on as-received dried rough rice, the outputs are:

- 68% milled rice (fancy, broken, x-brewers)
- 9% bran (includes mill dust)
- 22% hulls
- 1% trash (includes precleaning at unloading pit).

**Fumigation Process**

**Phosphine For Grain Fumigation**

Phostoxin (aluminum phosphide) is used by the malt plant as a fumigation for grain stored on-site. Phostoxin use is partially dependent on weather conditions and may also be applied to grain being delivered if pests are detected. The Jonesboro Rice Mill minimizes the use of Phostoxin whenever possible.

The application rates for Phostoxin on grain is regulated under the Federal Insecticide, Fungicide, Rodenticide Act.

**Methyl Bromide Fumigation**

The rice mill will conduct methyl bromide space fumigation of the mill building and associated processing equipment three (3) times per year. Fumigation generally occurs over a three day week-end such as Memorial Day and Labor Day. The rice mill contracts this work to pesticide companies that specialize in methyl bromide fumigation.

The contractor makes the mill building as airtight as possible with sealing techniques. Methyl bromide gas lines and monitoring stations are strategically located within the mill building. Methyl bromide is released into the mill building until the appropriate concentrations are obtained. The contractor monitors the methyl bromide levels, and, additional gas is released into the mill building as required based upon concentrations obtained from monitoring. According to the current mill contractor, the initial methyl bromide dosing conducted at Jonesboro has been sufficient for the maintenance of target doses for the entire fumigation process (i.e., no supplemental gas has to be injected into the building).

The methyl bromide fumigation process is maintained over a 20 to 24-hour period. Upon completion, the mill building is cleared of the methyl bromide gas using fans. According to the contractor, approximately 40% of the initial charge of gas remains in the building at the end of

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

the fumigation process. The aeration process lasts approximately 3 hours, and, the contractor ensures the building is safe for entry via a final monitoring process.

### **Regulations**

The facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Air Code) and the regulations of the *Arkansas Plan of Implementation for Air Pollution Control* (SIP). The facility has a total grain storage capacity of 953,000 bushels which is less than the NSPS-Subpart DD applicability limit of 1,000,000 bushels. The Jonesboro Rice Mill (BARI) mill has an

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

additional total by product storage capacity of 64,100 bushels storing bran or hulls. In order for the *New Source Performance Standards-Subpart DD* to not apply to this facility, the additional storage bins shall be dedicated to store bran or hulls.

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

| TOTAL ALLOWABLE EMISSIONS |                |      |
|---------------------------|----------------|------|
| Pollutant                 | Emission Rates |      |
|                           | lb/hr          | tpy  |
| PM                        | 19.7           | 18.5 |
| PM <sub>10</sub>          | 8.8            | 13.9 |
| Phosphine                 | 0.7            | 1.9  |
| Methyl Bromide            | 345            | 5    |

**SECTION III: PERMIT HISTORY**

348-A Permit #348-A was originally assigned to BARI on September 29, 1976 to install a rice drying and storage facility near Jonesboro, Arkansas. At that time, the facility was designed to handle approximately 2.2 million bushels of rice per year.

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

- 604-A Permit #604-A was later issued to BARI on April 25, 1980 for an expansion of rice milling operations, and rice storage capacity. This activity was regulated by 40 CFR Part 60, Subpart DD, New Source Performance Standards (NSPS).
- 604-AR-1 On September 25, 1981, permit 604-AR-1 modified permit 604-A to allow the additional time required (due to economic and design considerations) to proceed with construction of the proposed expansions of permit 604-A.
- 604-AR-2 On May 24, 1990, modified permit 604-AR-2 was issued for an increase in rough rice throughput capacity.
- 604-AR-3 Permit # 604-AR-3 was issued on July 7, 1992 as a modification to permit # 604-AR-2. This modification accounts for the installation of additional equipment, and a reduction in downtime due to equipment modification. This rerouting and enlargement of the Bran Transfer System is intended to improve its reliability and reduce mill restrictions. As previously stated, the mill throughput is expected to be 62,500 pounds per hour. Similarly, emission allowances are increased in proportion to throughput from the prior permit levels.
- 604-AR-4 Permit # 604-AR-4 was issued on October 7, 1997 as a modification to permit # 604-AR-3. BARI is proposing to modify the existing permit in order to re-evaluate New Source Performance Standards Subpart DD applicability and to obtain higher annual permitted production limits.
- 604-AR-5 Permit # 604-AR-5 was issued on March 24, 2000 as a modification to permit # 604-AR-4. This mill proposed to keep process throughput limits at 15 million bushels, thus, no changes in overall emissions were expected from this modification. BARI proposed the following modification to the existing permit:
1. Install 4 additional Carter-Day #618 Precision Size Graders (SN-36) and associated conveying equipment.
  2. Eliminate the Stick Machine (SN-34) and Reclaim Rotex (SN-35).
  3. Replace two screw conveyors used to transfer rough rice from the day tanks to the mill for processing (SN-21, equipment numbers 30-204 and 30-205).
  4. Replace six of the eight existing shellers (SN-40). The existing shellers are designed to process 1000 hundred weights (cwts) of rough rice per



**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

hour (50 tons/hour). Rough rice processing will not increase as a result of replacing the six shellers.

5. Replace all five (5) existing uniflow separators (SN-52). The current processing rate for the uniflows is 1000 cwts/hour (50 tons/hour) which will remain the same with the installation of the new equipment.
6. Replace all three existing precision graders with new like graders (SN-53). The current processing rate for fancy white rice is 1000 cwts/hour (50 tons/hour) which will remain the same with the installation of the new equipment.

604-AR-6 Permit 604-AR-6 was issued on March 28, 2001 as a modification to permit # 604-AR-5. This mill is proposed to increase the annual throughput from 340,875 to 400,000 tons (17.8 million bushels). Updated AP-42 emission factors were used in calculating emissions associated with increased production which resulted in annual PM10 emissions less than the emissions indicated in permit #604-AR-5. Also the insignificant activities list was updated, and Specific Condition 6 was revised as follows:

- 1 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 facility shall not mill more than 400,000 tons of grain per consecutive twelve-month period.

604-AR-7 Permit 804-AR-7 was issued on December 27, 2001 as a modification to permit # 604-AR-6. The mill increased the annual throughput from 400,000 tons to 500,000 tons (23 million bushels) of rice per year. An extensive modernization program was initiated which included replacement of old equipment, and the installation of new process equipment, and **an additional fabric filter (SN-110) to control emissions from the new processing equipment.**

This permit also included the conversion of four (4) bran storage bins, having a combined storage capacity of 20,800 bushels, to ground hull storage. A new bran storage bin having a capacity of 12,100 bushels was installed to replace all four (4) converted bran storage bins. The total by-product storage capacity will increase from 52,000 bushels to 64,100 bushels. Emissions associated with this change in by-product storage did not increase, but the process throughput for the mill changed.

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

**SECTION IV: EMISSION UNIT INFORMATION**

**Specific Conditions**

1. 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 | Control Equipment | Pollutant | lb/hr | tpy |
|----|-------------|-------------------|-----------|-------|-----|
|----|-------------|-------------------|-----------|-------|-----|

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

| SN  | Description                          | Control Equipment | Pollutant        | lb/hr | tpy |
|---|--------------------------------------|-------------------|------------------|-------|-----|
| 01  | Rice Receiving                       | Fabric Filter     | PM <sub>10</sub> | 0.2   | 0.3 |
| 03  | Ten (10) small storage bins          | None              | PM <sub>10</sub> | 1.2   | 0.3 |
| 04  | Four (4) large storage bins          | None              | PM <sub>10</sub> | 1.2   | 0.7 |
| 05  | Three (3) intermediate storage bins  | None              | PM <sub>10</sub> | 1.2   | 0.3 |
| 06  | Truck Loadout                        | Dust sock         | PM <sub>10</sub> | 0.1   | 0.1 |
| 02, 07, 08, 09, & 11  | Trash Removal                        | Fabric Filter     | PM <sub>10</sub> | 0.1   | 0.1 |
| 10  | Receiving Dust Collection            | Fabric Filter     | PM <sub>10</sub> | 0.1   | 0.1 |
| SN-59; with emissions from 100,101, 40, 42, 44, 102, 103, 104, 21-26, 54-58, 61-64, 87-90, 92, 95, 68 | Mill Rough Rice Dust Collector C-31. | Fabric Filter     | PM <sub>10</sub> | 0.1   | 0.4 |
| SN-60; with emissions from SN-105, 106, 107, 52, 53, 54, 57, 40, 42, 50, 52, 53, 56, 79,86, 91,       | Mill White Rice Dust Collector C-32. | Fabric Filter     | PM <sub>10</sub> | 0.1   | 0.1 |

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

| SN  | Description                         | Control Equipment | Pollutant        | lb/hr | tpy |
|---|-------------------------------------|-------------------|------------------|-------|-----|
| 93, 94, 96  | Reject Loadout                      |                   |                  |       |     |
| 66  |                                     | None              | PM <sub>10</sub> | 0.1   | 0.1 |
| 67  |                                     | None              | PM <sub>10</sub> | 0.3   | 0.9 |
| 69  | Milled Rice Storage                 | None              | PM <sub>10</sub> | 0.1   | 0.1 |
| 70  | Milled Rice Bagging                 | None              | PM <sub>10</sub> | 0.1   | 0.1 |
| 70  | Milled Rice Loadout                 | Sock              | PM <sub>10</sub> | 0.5   | 0.6 |
| 13, 61, 71  | Bran Transfer & Rough Rice Transfer | Fabric Filter     | PM <sub>10</sub> | 0.1   | 0.1 |
| 72  | Bran Storage-One Bin                | None              | PM <sub>10</sub> | 0.1   | 0.1 |
| 12, 73, 74  | Unground Hull Storage               | Fabric Filter     | PM <sub>10</sub> | 0.2   | 0.1 |
| 76  | Hammermills                         | Fabric Filter     | PM <sub>10</sub> | 0.1   | 0.1 |
| 77  | Ground Hull Storage-Nine Bins       | None              | PM <sub>10</sub> | 2.0   | 5.5 |
| 78  | By-product Loadout                  | Fabric Filter     | PM <sub>10</sub> | 0.8   | 3.5 |
| 96  | Rice Cracker and Aspirator          | Fabric Filter     | PM <sub>10</sub> | 0.1   | 0.1 |
| SN-110; with emissions from SN-108, 54, 55, 57, and 109 | New Bran Dust Collector C-39        | Fabric Filter     | PM <sub>10</sub> | 0.1   | 0.1 |

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

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                          | Control Equipment | Pollutant | lb/hr | tpy |
|--|--------------------------------------|-------------------|-----------|-------|-----|
| 01   | Rice Receiving                       | Fabric Filter     | PM        | 1.0   | 1.1 |
| 03   | Ten (10) small storage bins          | None              | PM        | 4.5   | 1.0 |
| 04   | Four (4) large storage bins          | None              | PM        | 4.5   | 2.8 |
| 05   | Three (3) intermediate storage bins  | None              | PM        | 4.5   | 1.3 |
| 06   | Truck Loadout                        | None              | PM        | 0.3   | 0.1 |
| 02, 07, 08, 09, & 11   | Trash Removal                        | Fabric Filter     | PM        | 0.1   | 0.1 |
| 10   | Receiving Dust Collection            | Fabric Filter     | PM        | 0.2   | 0.2 |
| SN-59; with emissions from 100,101, 40, 42, 44, 102, 103, 104, 21-26, 54-58, 61-64, 87-90, 92, 95, | Mill Rough Rice Dust Collector C-31. | Fabric Filter     | PM        | 0.1   | 0.4 |

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

| SN   | Description                                 | Control Equipment | Pollutant | lb/hr | tpy |
|--|---|-------------------|-----------|-------|-----|
| 68   |   |                   |           |       |     |
| SN-60;<br>with<br>emissions<br>from SN-<br>105, 106,<br>107, 52,<br>53, 54,<br>57, 40,<br>42, 50, 52,<br>53, 56,<br>79,86, 91,<br>93, 94, 96 | Mill White Rice<br>Dust Collector C-<br>32. | Fabric Filter     | PM        | 0.1   | 0.1 |
| SN-110;<br>with<br>emissions<br>from SN-<br>108, 54,<br>55, 57,<br>and 109   | New<br>Bran Dust<br>Collector<br>C-39       | Fabric Filter     | PM        | 0.1   | 0.1 |
| 66   | Reject Loadout                              | None              | PM        | 0.1   | 0.1 |
| 67   | Milled Rice<br>Storage                      | None              | PM        | 0.2   | 1.0 |
| 69   | Milled Rice<br>Bagging                      | None              | PM        | 0.1   | 0.1 |
| 70   | Milled Rice<br>Loadout                      | None              | PM        | 0.5   | 0.5 |
| 13, 61, 71   | Bran Transfer &<br>Rough Rice<br>Transfer   | Fabric Filter     | PM        | 0.1   | 0.1 |

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

| SN   | Description                           | Control Equipment | Pollutant                      | lb/hr      | tpy      |
|--|---------------------------------------|-------------------|--------------------------------|------------|----------|
| 72   | Bran Storage-One Bin                  | None              | PM                             | 0.1        | 0.1      |
| 12, 73, 74   | Unground Hull Storage                 | Fabric Filter     | PM                             | 0.1        | 0.1      |
| 76   | Hammermills                           | Fabric Filter     | PM                             | 0.1        | 0.1      |
| 77   | Ground Hull Storage-Nine Bins         | None              | PM                             | 2.0        | 5.5      |
| 78   | By-product Loadout                    | Fabric Filter     | PM                             | 0.8        | 3.5      |
| 96   | Rice Cracker and Aspirator            | Fabric Filter     | PM                             | 0.1        | 0.1      |
| 97   | Fumigation Process                    | None              | Phosphine<br>Methyl<br>Bromide | 0.7<br>345 | 1.9<br>5 |
| SN-110;<br>with<br>emissions<br>from SN-<br>108, 54,<br>55, 57,<br>and 109 | New<br>Bran Dust<br>Collector<br>C-39 | Fabric Filter     | PM                             | 0.1        | 0.1      |

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 | Limit | Regulatory Citation |
|----|-------|---------------------|
| 01 | 5%    | 18.501              |

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

| SN   | Limit | Regulatory Citation |
|--|-------|---------------------|
| 03   | 20%   | 18.501              |
| 04   | 20%   | 18.501              |
| 05   | 5%    | 18.501              |
| 06   | 20%   | 18.501              |
| 02, 07, 08, 09, & 11   | 5%    | 18.501              |
| 10   | 5%    | 18.501              |
| SN-59; with emissions from 100,101, 102, 103, 104, 21-26, 40,42,44, 54, 55,57,58, 61-64, 79, 87-90, 92, 95, 68 | 5%    | 18.501              |
| SN-60; with emissions from SN-105, 106, 107, 40, 41, 50, 52, 53, 56,86, 91, 93, 94, 96                         | 5%    | 18.501              |
| 66 - 69  | 20%   | 18.501              |
| 70   | 20%   | 18.501              |
| 13, 61, 71   | 5%    | 18.501              |
| 72   | 20%   | 18.501              |
| 12, 73, 74   | 5%    | 18.501              |
| 76   | 5%    | 18.501              |
| 77   | 20%   | 18.501              |
| 78   | 5%    | 18.501              |
|  | 5%    | 18.501              |



**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

| SN  | Limit | Regulatory Citation |
|---|-------|---------------------|
| SN-110; with emissions from SN-108, 54, 55, 57, and 109 |       |                     |

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, the facility shall not mill more than 500,000 tons of grain per consecutive twelve month period, and all grain received at the facility must be milled. (note: Facility requested to keep records of grain milled rather than grain received).
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 maintain monthly records which demonstrate compliance with Specific Condition #6. 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. A twelve month rolling total and each individual month's data shall be kept on site.
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 maintain and operate the moving vertical hood (by-product truck loadout SN-78) at all times when the loadout operations are in progress.
9. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall dedicate by-product storage

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

bins SN-74, and SN-77 to the storage of by-products (hulls) only. The by-product storage bins (hulls) capacity will not exceed 52,000 bushels, and shall be excluded from the use of storage for grain.

10. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall dedicate bran storage bin SN-72, to the storage bran only. The bran storage bin capacity will not exceed 12,100 bushels, and shall be excluded from the use of storage for grain.
11. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall store only processed rice in milled rice storage bins SN-67. The milled rice storage bins shall be excluded from the use of storage for field grain.
12. Pursuant to §19.703 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall label all control equipment and associated emission points for easy identification. A complete equipment list is included in Appendix A.
13. Pursuant to §18.1004 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use more than 5.8 tons of aluminum phosphide and 5 tons of methyl bromide per consecutive 12 month period.
14. Pursuant to §18.1004 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 the usage limits in Specific Condition #13. 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. A twelve month rolling total and each individual month's data shall be kept on site.

**SECTION V: INSIGNIFICANT ACTIVITIES**

The following types of activities or emissions are deemed insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

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 November 3, 2000.

| Description   | Category |
|---|----------|
| 20 burners rated at 1 million BTU/hr                      | A-1      |
| Two (2) - 1,000 gallon gasoline tanks                     | A-3      |
| One (1) - 500 gallon diesel fuel tanks                    | A-3      |
| Containers of less than or equal to 5 gallons in capacity | A-8      |

**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 five 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.

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

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

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

emission limit established by this permit, they shall be deemed in violation of said permit and 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
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.

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

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.

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

## APPENDIX A



**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

| <b>Source Number</b> | <b>Description</b>                        | <b>Control Equipment</b> | <b>Equipment Number</b> |
|----------------------|---|--------------------------|-------------------------|
| 1                    | Rice Receiving Pit                        | Fabric Filter (C-1)      | 28-201                  |
| 2                    | Surge Bin, Rough Rice Cleaners<br>1,2, &3 | Fabric Filter (C-1)      | 28-301-1, -2, -3        |

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

| <b>Source Number</b> | <b>Description</b>                | <b>Control Equipment</b>      | <b>Equipment Number</b>                          |
|----------------------|-----------------------------------|-------------------------------|--|
| 3                    | Small Storage Bins (1-10)         | None                          | 28-001 thru -010                                 |
| 4                    | Large Storage Bins (11-14)        | None                          | 28-011 thru -014                                 |
| 5                    | Intermediate Storage Bins (15-18) | None                          | 28-015 thru -018                                 |
| 6                    | Rough Rice Truck Loadout          | Dust Sock                     | 28-209   |
| 7                    | Drag / Screw Conveyors (6 units)  | Fabric Filter (C-1)           | 28-201 thru 28-204, 210, 217                     |
| 8                    | Bucket Elevators (3 units)        | Fabric Filter (C-1)           | 28-101 thru -103                                 |
| 9                    | Trash Removal                     | None                          | Trash Tank                                       |
| 10                   | Receiving Dust Collection         | Fabric Filter (C-1)           | 28-631   |
| 11                   | Screener                          | Fabric Filter (C-1)           | 28-302   |
| 12                   | Rough Rice Hull Transfer Receiver | Fabric Filter (C-34 and C-35) | 34-704   |
| 13                   | Rough Rice Dust Transfer Receiver | Fabric Filter (C-33)          | 34-705   |
| 21                   | Bucket Elevators (8 units)        | Fabric Filter (C-31 and C-32) | 31-101, -103, -104, -106, -107, -111, -112, -115 |
| 22                   | Bucket Elevators (3 units)        | Fabric Filter (C-31 and C-32) | 31-102, -109, -113                               |
| 23                   | Bucket Elevators (4 units)        | Fabric Filter (C-31 and C-32) | 31-105, -108, -114, -119                         |
| 24                   | Bucket Elevators (1 units)        | Fabric Filter (C-31 and C-32) | 31-110   |
| 25                   | Bucket Elevators (1 units)        | Fabric Filter (C-31 and C-32) | 31-120, -121, -122                               |

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

|    |   |                               |                      |
|----|---|-------------------------------|----------------------|
| 26 | Bucket Elevators (2 units)                      | Fabric Filter (C-31 and C-32) | 31-123, -124         |
| 31 | Mill Day Tanks (3 units)                        | Fabric Filter (C-31)          | 30-001, -002, -003   |
| 32 | Rough Rice Bulk Scale<br>REMOVED                | Fabric Filter (C-32)          | 31-301               |
| 33 | Screen Machines (2 units)<br>REMOVED            | Fabric Filter (C-32)          | 31-302-1, -2         |
| 34 | Stick Machine NO LONGER IN SERVICE [DISMANTLED] |                               |                      |
| 35 | Reclaim Rotex NO LONGER IN SERVICE [DISMANTLED] |                               |                      |
| 36 | Precision Graders (4 units)<br>REMOVED          | Fabric Filter (C-32)          | 31-305-1, -2, -3, -4 |
| 37 | Precision Graders (1 units)<br>REMOVED          | Fabric Filter (C-32)          | 31-305-9             |
| 38 | Disc Graders (3 units)<br>REMOVED               | Fabric Filter (C-32)          | 31-306-1, -2, -3     |
| 39 | Disc Grader (Reclaim)<br>REMOVED                | Fabric Filter (C-32)          | 31-332               |
| 40 | Shellers (8 units)                              | Fabric Filter (C-32)          | 31-307-1 thru -8     |
| 41 | Paddy Separators (3 units)                      | Fabric Filter (C-32)          | 31-308-1, -2, -3     |
| 42 | Precision Grader                                | Fabric Filter (C-31)          | 31-310               |
| 43 | Precision Graders (2 units)<br>REMOVED          | Fabric Filter (C-32)          | 31-309-1, -2         |
| 44 | Volumetric Feeder (Lime)                        | Fabric Filter (C-31)          | 31-312               |
| 45 | Pearlers - Main Line (15 units)<br>REMOVED      | Fabric Filter (C-31)          | 31-311-1 thru -15    |
| 46 | Aspirator<br>REMOVED                            | Fabric Filter (C-31)          | 31-313               |
| 47 | Screeners (3 units)<br>REMOVED                  | None                          | 31-312-1, -2, -3     |
| 48 | Volumetric Feeder (Talc) NO LONGER IN SERVICE   |                               |                      |

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

|    |  |                      |                                     |
|----|--|----------------------|-------------------------------------|
|    | [DISMANTLED]   |                      |                                     |
| 49 | Trumble NO LONGER IN SERVICE [DISMANTLED]                |                      |                                     |
| 50 | Aspirator  | Fabric Filter (C-32) | 31-330-A                            |
| 51 | Disc Graders (3 Units) NO LONGER IN SERVICE [DISMANTLED] |                      |                                     |
| 52 | Uniflow Graders (5 units)                                | Fabric Filter (C-32) | 31-318-1 thru -5                    |
| 53 | Precision Graders (3 units)                              | Fabric Filter (C-32) | 31-319-1, -2, -3                    |
| 54 | Pearlers (2 units)                                       | Fabric Filter (C-31) | 31-311-16 and -17                   |
| 55 | Aspirator  | Fabric Filter (C-31) | 31-314                              |
| 56 | Precision Graders (2 units)                              | Fabric Filter (C-32) | 31-340, 31-341                      |
| 57 | Pearler - X-brewers                                      | Fabric Filter (C-31) | 31-311-18                           |
| 58 | Aspirator (Moved in series with SN-55)                   | Fabric Filter (C-31) | 31-315                              |
| 59 | Mill Rough Rice Dust Collector                           | Fabric Filter (C-31) | 31-601                              |
| 60 | Mill White Rice Dust Collector                           | Fabric Filter (C-32) | 31-604                              |
| 61 | Bran Screening   | Fabric Filter (C-31) | 31-333                              |
| 62 | Broken Screening   | Fabric Filter (C-31) | 31-342                              |
| 63 | Precision Grader   | Fabric Filter (C-31) | 31-322                              |
| 64 | Color Sorter -Main Line (6 units)                        | Fabric Filter (C-31) | 31-330-1 thru -5                    |
| 65 | Reject Rice Bin  | None                 | 32-040                              |
| 66 | Reject Loadout   | None                 | 33-241                              |
| 67 | Milled Rice Storage (10 units)                           | None                 | 32-001 thru 004<br>32-020 thru -022 |

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

|    |   |                               |   |
|----|---|-------------------------------|---|
|    |   |                               | 32-030 thru -032  |
| 68 | Scalpers (2 units)                                    | Fabric Filter (C-32)          | 32-301, 32-302  |
| 69 | Milled Rice Bagging                                   | None                          | 33-301  |
| 70 | Milled Rice Loadout                                   | Sock                          | 33-203, 33-204  |
| 71 | Bran Transfer   | None                          | 31-703  |
| 72 | Bran Storage (1 unit): 12,100 bushel bran storage bin | None                          | 34-041 thru -044  |
| 73 | Hull Transfer System (2 units )                       | None                          | 36-101 and 36-201   |
| 74 | Unground Hull Storage                                 | Fabric Filter (C-34 and C-35) | 34-040  |
| 75 | Hull Baler – NO LONGER IN SERVICE [DISMANTLED]        |                               |   |
| 76 | Hammermill System (13 units)                          | Fabric Filter (C-36)          | 34-060, 34-101, 34-103, 34-205, -220, -221<br>34-301, -302A, -302-B, -303, -304, -701, -702 |
| 77 | Ground Hull Storage (9 units)                         | None                          | 34-045 thru -049  |
| 78 | By Products Loadout (2 units)                         | Fabric Filter (C-37)          | 35-202 and 34-203   |
| 79 | Color Sorter (Brewers)                                | Fabric Filter (C-31)          | 31-330-7  |
| 86 | Screw Conveyors (4 units)                             | Fabric Filter (C-32)          | 31-201, -208, -214, -223  |
| 87 | Screw Conveyors (10 units)                            | Fabric Filter (C-31)          | 31-202, -203, -205, -210, -212, -218, -219, -222, -243, -246                                |
| 88 | Screw Conveyors (6 units)                             | Fabric Filter (C-31)          | 31-204, -206, -206A, -209, -213, -216, -221   |
| 89 | Screw Conveyors (5 units)                             | Fabric Filter (C-31)          | 31-207, -207A, -229, -232, -247, -273   |

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

|     |   |                      |                      |
|-----|---|----------------------|----------------------|
| 90  | Screw Conveyor  | Fabric Filter (C-31) | 31-215               |
| 91  | Screw Conveyor  | Fabric Filter (C-32) | 31-217               |
| 92  | Screw Conveyors (3 units)   | Fabric Filter (C-31) | 31-220, -228, -240   |
| 93  | Screw Conveyor  | Fabric Filter (C-32) | 31-227               |
| 94  | Screw Conveyors (2 units)   | Fabric Filter (C-32) | 31-230 and 31-248    |
| 95  | Pearler Conveyor  | Fabric Filter (C-31) | 31-237               |
| 96  | Rice Cracker and Aspirator  | Fabric Filter (C-32) | 31-345 & 31-347      |
| 100 | Conveyors, scales and other incidental equipment vented to Mill Rough Rice Dust Collector, SN-59          | C-31                 | See List             |
| 101 | Rough rice paddy cleaners-NEW   | C-31                 | See List             |
| 102 | Reel Scalpers   | C-31                 | 31-761               |
| 103 | Destoners   | C-31                 | 31-780               |
| 104 | Bucket Elevators vented to the Mill rough Rice Dust Collector, SN-59                                      | C-31                 | 31-151               |
| 105 | Sweco Screeners (4)   | C-32                 | 31-791,793,795 & 797 |
| 106 | Conveyors (and incidental equipment) associated with control device C-32, Mill White Rice Dust Collection | C-32                 | 31-552, See List     |
| 107 | Elevator legs associated with C-32  | C-32                 | 31-112               |

**Busch Agricultural Resources**  
**Permit #: 604-AR-8**  
**AFIN: 16-00104**

|     |  |      |                  |
|-----|--|------|------------------|
| 108 | Three break whitener System                                  | C-39 | 31-831 to 31-893 |
| 109 | White rice drag conveyor                                     | C-39 | 31-550           |
| 110 | New Bran Dust Collector,<br>designated as Fabric Filter C-39 | N/A  |                  |