

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1563-AR-2

IS ISSUED TO:

Butterball Turkey Company
1200 N. College
Huntsville, AR 72740
Madison County
CSN: 44-0069

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

PERMITTEE:	Butterball Turkey Company	
CSN:	44-0069	
PERMIT NUMBER:	1563-AR-2	
FACILITY ADDRESS:	1200 N. College Huntsville, AR 72740	
COUNTY:	Madison	
CONTACT POSITION:	John R. Smith	
TELEPHONE NUMBER:	501-738-2151	
REVIEWING ENGINEER:	Richard Nissen	
UTM North-South (X):	Zone 15	3,995.319
UTM East-West (Y):	Zone 15	433.684

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SECTION II: INTRODUCTION

Summary

Butterball Turkey Company (BTC) operates a turkey processing plant located at 1200 North College, Huntsville, AR 72740. The facility is located approximately three-fourths of a mile north of highway 412. The facility, after implementing the requested changes, will have emissions which are not sufficient to require an air permit under Arkansas regulations. BTC has chosen not to terminate the air permit and to instead retain a modified permit because of anticipated near term plant modifications.

This permit change corrects the permit to show the installation of a 500 hp boiler instead of the 400 hp boiler previously permitted. The 500 hp boiler was purchased because of quick availability.

Process Description

SN-01 and SN-02 are natural gas fired boilers which provide steam for the plant. The boilers supply the scalders, ovens, sterilization equipment, and packaging department with steam. SN-04 provides hot water for the process line.

Birds are delivered to the unloading dock by flat bed trucks and remain there until processing. Processing starts with the unloading and transferring of birds, via conveyor line, to the kill room. There they are stunned and killed, then proceed through the scalders. The line proceeds to the picking room where the feathers are removed. The birds are transferred from the hang line to the evisceration line. They proceed through the evisceration area and are then removed from the line. Next the birds are inspected and routed to the chillers. They proceed from the chillers into the packaging area or to the baking oven (SN-05). The birds are then sized before packing. The packaged birds are sent by conveyor belt to the boxing room. The boxed birds then advanced to the palletizing area where the pallets are placed in blast cells for freezing. They remain in the blast cells for 24 hours. The birds are either shipped immediately or routed to the storage freezer awaiting shipment.

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Regulations

Source SN-05 of this facility is subject to the New Source Performance Standards (NSPS) of CFR Part 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The rating of the boiler is equal to or more than 10 MMBtu/hour. Record keeping is the only section Subpart Dc that applies.

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

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

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	0.8	2.8
PM ₁₀	0.8	2.8
SO ₂	0.4	1.3
VOC	0.5	1.6
CO	2.9	9.9
NO _x	4.5	23.9

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SECTION III: PERMIT HISTORY

October 4, 1994

Permit #1563-A

First air permit issued for this facility.

February 14, 2000

Permit #1563-AR-1

The permit changed the following:

1. Removed the existing SN-03 from the permit. The Pactherm Incinerator was never installed at the plant. If such an installation is pursued in the future, a separate permit will be required.
2. Allowed for the addition of the Chemidyne Quikwater 75 hp natural gas, hot water heater (SN-04). The original installation date for the unit was June 15, 1995.
3. Added a new 400 hp boiler (SN-05) to a new, steam baked, product line.

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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	Pollutant	lb/hr	tpy
01	250 hp Boiler	PM ₁₀	0.2	0.9
		SO ₂	0.1	0.4
		VOC	0.1	0.4
		CO	0.4	1.8
		NO _x	1.5	6.6
02	200 hp Boiler	PM ₁₀	0.1	0.4
		SO ₂	0.1	0.4
		VOC	0.1	0.4
		CO	0.2	0.9
		NO _x	0.9	3.9
03	(Equipment never installed)			
04	75 hp Water Heater	PM ₁₀	0.2	0.9
		SO ₂	0.1	0.4
		VOC	0.1	0.4
		CO	0.4	1.8
		NO _x	1.5	6.6
05	500 hp Boiler	PM ₁₀	0.3	0.6
		SO ₂	0.1	0.1
		VOC	0.2	0.4
		CO	1.9	5.8
		NO _x	2.1	6.8

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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	250 hp Boiler	PM	0.2	0.9
02	200 hp Boiler	PM	0.1	0.4
03	(Equipment never installed)			
04	75 hp Boiler	PM	0.2	0.9
05	500 hp Boiler	PM	0.3	0.6

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
02	5%	18.501
03	(Equipment never installed)	
04	5%	18.501
05	5%	18.501

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 19.304 and 40 CFR 60.48c(i) of NSPS Subpart Dc the facility shall maintain natural gas usage records for two years for boiler #1 and #5. These records shall be kept on-

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site and available to ADEQ personnel upon request.

7. Pursuant to 19.304 , 40 CFR 60.48c(g) of NSPS Subpart Dc and by authority letter from EPA to ADEQ, the facility may maintain monthly records of the natural gas used in boiler SN-05. The gas may either be metered to SN-05 or the usage may be prorated based on the fraction of Btu rating for SN-05 to the aggregate Btu rating for all the natural gas equipment.
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 not consume more than 361,700 Mscf of natural gas at the facility per consecutive 12 month period.
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 #8. Records shall be updated by the fifth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be maintained on site and shall be made available to Department personnel upon request.

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SECTION V: INSIGNIFICANT ACTIVITIES

The Insignificant Activities lists are found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in the application dated March 5, 1999. The application listed no insignificant activities.

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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 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.

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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 shall be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following

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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.
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.

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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

INVOICE REQUEST FORM

PDS-

Date April 4, 2003

<input checked="" type="checkbox"/>	Air
<input type="checkbox"/>	NPDES
<input type="checkbox"/>	Stormwater
<input type="checkbox"/>	State Permits Branch
<input type="checkbox"/>	Solid Waste

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Facility Name Butterball Turkey Company

Invoice Mailing Address 1200 North College
Huntsville, Arkansas 72740

<input type="checkbox"/>	Initial
<input checked="" type="checkbox"/>	Modification
<input type="checkbox"/>	Annual

Permit Number 1563-AR-2
Permit Description Minor Source
Permit Fee Code A

Amount Due \$ 400.00

Engineer Richard Nissen

Paid? ☐No ☐Yes Check #

Comments: Air Permit Fee Calculation
Minimum Fee