STATEMENT OF BASIS

for the issuance of Draft Air Permit #:1563-AR-3

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality 8001 National Drive Post Office Box 8913 Little Rock, Arkansas 72219-8913

2. APPLICANT:

ConAgra Foods - Huntsville Facility 1294 North College Avenue Huntsville, AR 72740

3. PERMIT WRITER: Patty Campbell

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Poultry Processing

NAICS Code: 311615

5. SUBMITTALS: January 26, 2006

6. REVIEWER'S NOTES:

ConAgra Foods Huntsville Facility is a turkey processing plant located at 1294 North College, Huntsville, AR 72740. The facility is located approximately three-fourth mile north of Highway 412. ConAgra seeks authorization to remove an existing 250 hp Williams/Davis boiler (SN-01) and replace it with a new 300 hp Cleaver/Brooks boiler (SN-06A/B). The new boiler will primarily be natural gas-fired but on an emergency basis will use No. 2 oil for no more than 360 hours during any consecutive 12-month period. Emissions associated with the new 300 hp boiler (SN-06A/B) are: 0.7 tpy PM/PM₁₀, 1.3 tpy SO₂, 1.0 tpy VOC, 8.3 tpy CO, and 4.4 NO_x. The facility has emissions which are not sufficient to require an air permit under Arkansas regulations. ConAgra has chosen to retain a permit because of anticipated near term plant modifications.

7. COMPLIANCE STATUS:

The facility is currently under no enforcement action.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Y/N No Modeling, et cetera?

Has this facility undergone PSD review in the past?

Y/N Permit# No

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Is this facility categorized as a major source for PSD? Y/N No ≥ 100 tpy and on the list of 28 (100 tpy)? Y/N No ≥ 250 tpy all other Y/N No

PSD Netting

Was netting performed to avoid PSD review in this permit? Y/N No

If so, indicate increases and decreases used in netting for PSD purposes only.

Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
SN-05 & SN-06A/B	None	NSPS Subpart Dc

9. EMISSION CHANGES:

The following table summarizes plant wide emission changes associated with this permitting action.

Plant Wide Permitted Emissions (ton/yr)						
Pollutant	Pollutant Air Permit #1563-AR-2 Air Permit #1563-AR-3					
PM/PM ₁₀	2.8	2.6	-0.2			
SO_2	1.3	2.2	+0.9			
VOC	1.6	2.2	+0.6			
СО	9.9	16.8	+6.9			
NO_X	23.9	21.7	-2.2			

10. MODELING:

Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

Other Modeling

None

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11. Non-Criteria Pollutants

None

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/hr)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/ uncontrolled, etc)
01		Remov	ed from Servio	ce	
02	Previous Permit	Various	None	n/a	Natural gas only
03	Previous Permit	Various	None	n/a	Natural gas only
04		Equipme	ent never instal	lled	
05	Previous Permit	Various	None	n/a	Natural gas only
06A	Cleaver–Brooks Manufacturer's Data	$(lbs/hr) \\ PM/PM_{10} - 0.122 \\ SO_2 - 0.012 \\ VOC - 0.196 \\ CO - 1.84 \\ NO_X - 0.86$	None	n/a	Natural gas fuel only, except as noted below (SN- 06B)
06B	Cleaver–Brooks Manufacturer's Data	nufacturer's $VOC = 0.31$		n/a	No. 2 fuel is used on an emergency basis only, not to exceed 360 hrs/yr

13. TESTING REQUIREMENTS:

Stack testing not required.

14. MONITORING OR CEMS

None.

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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-05 & SN-06A	Natural Gas	361,700 m scf/yr	Monthly	No
SN-06B	Hours (of No. 2 Oil Usage)	360 hrs/yr	Monthly	No

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

16. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
SN-02, 04, 05 & 06A	5%	§18.501	Observation
06B	20%	§18.501 & 40 CFR 60 Subpart Dc	Observation

17. DELETED CONDITIONS:

The previous permit contained the following deleted Specific Conditions.

Former SC	Justification for removal
	None

^{**} Indicates whether the item needs to be included in reports

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

Permit #	
1563-AR-2	

19. CONCURRENCE BY:

The following S	upervisor	concurs	with th	he permitting	decision:

David Triplett, P.E. Engineer Supervisor