

## 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/PM<sub>10</sub>, 1.3 tpy SO<sub>2</sub>, 1.0 tpy VOC, 8.3 tpy CO, and 4.4 NO<sub>x</sub>. 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, Modeling, et cetera?)	Y/N	No
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Has this facility undergone PSD review in the past?	Y/N	Permit#	No
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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	Removed from Service				
02	Previous Permit	Various	None	n/a	Natural gas only
03	Previous Permit	Various	None	n/a	Natural gas only
04	Equipment never installed				
05	Previous Permit	Various	None	n/a	Natural gas only
06A	Cleaver-Brooks Manufacturer's Data	(lbs/hr) PM/PM <sub>10</sub> – 0.122 SO <sub>2</sub> – 0.012 VOC – 0.196 CO – 1.84 NO <sub>x</sub> – 0.86	None	n/a	Natural gas fuel only, except as noted below (SN-06B)
06B	Cleaver-Brooks Manufacturer's Data	(lbs/hr) PM/PM <sub>10</sub> – 0.295 SO <sub>2</sub> – 6.31 VOC – 0.306 CO – 0.86 NO <sub>x</sub> – 3.04	None	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.

**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.)

\*\* 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-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

**18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS**

**Permit #: 1563-AR-3**  
**AFIN: 44-00069**  
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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 Supervisor concurs with the permitting decision:

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David Triplett, P.E.  
Engineer Supervisor