

## STATEMENT OF BASIS

for the issuance of Draft Air Permit # :1563-AR-4

**1. PERMITTING AUTHORITY:**

Arkansas Department of Environmental Quality  
5301 Northshore Dr  
N. Little Rock, Arkansas 72118-5317

**2. APPLICANT:**

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

**3. PERMIT WRITER:** Ambrosia Brown

**4. PROCESS DESCRIPTION AND NAICS CODE:**

NAICS Description: Poultry Processing  
NAICS Code: 311615

**5. SUBMITTALS:** March 05, 2009

**6. REVIEWER'S NOTES:**

ConAgra Foods Huntsville Facility is a turkey processing plant located at 1294 North College, Huntsville, AR 72740. The facility submitted a modification to their air permit in order to remove SN-04 75hp Quickwater hot water heating system and replace it with Energy Systems Analysts Inc 500hp hot water system SN-07. This system is to be fueled with natural gas only. The changes of pollutants due to this action are -0.1 tpy PM<sub>10</sub>, -0.3 tpy SO<sub>2</sub>, 0.2 tpy VOC, 6.1 tpy CO, 2.8 tpy NO<sub>x</sub>, and -0.1 tpy PM. 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
Has this facility undergone PSD review in the past?	Y/N	Permit# No
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	Air Permit #1563-AR-3	Air Permit #1563-AR-4	Change
PM/PM <sub>10</sub>	2.6	2.5	-0.1
SO <sub>2</sub>	2.2	1.9	-0.3
VOC	2.2	2.4	0.2
CO	16.8	22.9	6.1
NO <sub>x</sub>	21.7	24.5	2.8

**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

**11. Non-Criteria Pollutants**

None

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units	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	Removed				
05	Previous Permit	Various	None	n/a	Natural gas only
06A	Cleaver-Brooks Manufacturer's Data	PM/PM <sub>10</sub> - 0.122 lbs/hr SO <sub>2</sub> - 0.012 lbs/hr VOC - 0.196 lbs/hr CO - 1.84 lbs/hr NO <sub>x</sub> - 0.86 lbs/hr	None	n/a	Natural gas fuel only, except as noted below (SN-06B)
06B	Cleaver-Brooks Manufacturer's Data	PM/PM <sub>10</sub> - 0.295 lbs/hr SO <sub>2</sub> - 6.31 lbs/hr VOC - 0.306 lbs/hr CO - 0.86 lbs/hr NO <sub>x</sub> - 3.04 lbs/hr	None	n/a	No. 2 fuel is used on an emergency basis only, not to exceed 360 hrs/yr
07	AP-42 Tables: 1.4-1 1.4-2 1.4-3	PM/PM <sub>10</sub> - 0.163 lbs/hr SO <sub>2</sub> - 0.013 lbs/hr VOC - 0.118 lbs/hr CO - 1.799 lbs/hr NO <sub>x</sub> - 2.142 lbs/hr	None	n/a	Natural Gas Only

**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, 05, 06A & 07	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**

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

Permit #
1563-AR-3

**19. CONCURRENCE BY:**

The following Supervisor concurs with the permitting decision:

\_\_\_\_\_

Paula Parker



