

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1563-AR-5 AFIN: 44-00069

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Butterball, LLC - Huntsville Facility
1294 North College Avenue
Huntsville, Arkansas 72740

3. PERMIT WRITER:

John Mazurkiewicz

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Poultry Processing
NAICS Code: 311615

5. ALL SUBMITTALS:

Date of Application	Type of Application (New, Renewal, Modification, De Minimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
8/7/2017	De Minimis	Add a 500 hp boiler (SN-08) as a permitted source

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 De Minimis modification to

- Change NAICS Code from 311611- Animal (except Poultry) Slaughtering to 311615- Poultry Processing;
- Add a 500 hp boiler (SN-08) as a permitted source. The boiler is subject to 40 CFR Part 60 - Subpart Dc: *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.*

As a result of this modification, permitted emissions have increased 0.7 tpy PM/PM₁₀; 0.1 tpy SO₂; 0.6 tpy VOC; 7.7 tpy CO; 9.2 tpy NO_x, and 0.17 tpy Total HAPs.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

There are no current enforcement actions against the facility.

8. PSD APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)?
No

b) Is the facility categorized as a major source for PSD?

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*
No

If yes, explain why this permit modification is not PSD. N/A

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-05, SN-06A/B & SN-08	None	NSPS Subpart Dc

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions are below thresholds of concern.

c) H₂S Modeling: N/A

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
02	Previous Permit	Various	None	n/a	Natural gas only
05	Previous Permit	Various	None	n/a	Natural gas only
06A	Cleaver-Brooks Manufacturer's Data	PM/PM ₁₀ - 0.122 lbs/hr SO ₂ - 0.012 lbs/hr VOC - 0.196 lbs/hr CO - 1.84 lbs/hr NO _x - 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 ₁₀ - 0.295 lbs/hr SO ₂ - 6.31 lbs/hr VOC - 0.306 lbs/hr CO - 0.86 lbs/hr NO _x - 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 ₁₀ - 0.163 lbs/hr SO ₂ - 0.013 lbs/hr VOC - 0.118 lbs/hr CO - 1.799 lbs/hr NO _x - 2.142 lbs/hr	None	n/a	Natural Gas Only
08	AP-42 Chapter 1.4 Natural Gas Combustion	PM/PM ₁₀ - 7.6 lb/MMBtu SO ₂ - 0.6 lb/MMBtu VOC - 5.5 lb/MMBtu CO - 84.0 lb/MMBtu NO _x - 100.0 lb/MMBtu	None	n/a	Natural Gas Only

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None.				

14. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
None.				

15. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN-05, SN-06A & SN-08	Natural Gas	n/a	Monthly	No
SN-06B	Hours (of No. 2 Oil Usage)	360 hrs/yr	Monthly	No

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
SN-02, 05, 06A, 07 & 08	5%	§18.501	Observation
06B	20%	§18.501 & 40 CFR 60 Subpart Dc	Observation

17. DELETED CONDITIONS:

Former SC	Justification for removal
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Former SC	Justification for removal
None.	

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
None.								

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1563-AR-4

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Butterball LLC

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			<u>Old Permit</u>	<u>New Permit</u>
\$/ton factor	23.93	Permit Predominant Air Contaminant	24.5	33.7
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	9.2	
Minimum Initial Fee \$	500			
Check if Administrative Amendment <input type="checkbox"/>		Permit Fee \$	<u>400</u>	
		Annual Chargeable Emissions (tpy)	<u>33.7</u>	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	2.5	3.2	0.7
PM ₁₀	2.5	3.2	0.7
PM _{2.5}	0	0	0
SO ₂	1.9	2	0.1
VOC	2.4	3	0.6
CO	22.9	30.6	7.7
NO _x	24.5	33.7	9.2
Single HAP	0	0.17	0.17
Total HAP	0	0.17	0.17