

STATEMENT OF BASIS

For the issuance of Air Permit # 1563-AR-6 AFIN: 44-00069

1. PERMITTING AUTHORITY:

Division 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:

Jimmy Do

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Poultry Processing
NAICS Code: 311615

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
10/17/2022	Administrative Amendment	Add a 308-Gallon Microtox Tank. There was no change in emissions.

6. REVIEWER'S NOTES:

Butterball Huntsville Facility is a turkey processing plant located at 1294 North College, Huntsville, AR 72740. The facility submitted an Administrative Amendment to add a 308-gallon Microtox Tank. There is no change in total emissions.

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/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? N

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

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

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. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
None				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

N/A

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

N/A

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

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

15. 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	None	n/a	Natural Gas Only

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		lbs/hr CO – 1.799 lbs/hr NOX – 2.142 lbs/hr			
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 NOx - 100.0 lb/MMBtu	None	n/a	Natural Gas Only

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

17. 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				

18. 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

19. 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

20. DELETED CONDITIONS:

Former SC	Justification for removal
	None

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
308-Gallon Microtox Tank	A-3	-	-	0.003	-	-	-	-

Permit #: 1563-AR-6

AFIN: 44-00069

Page 6 of 6

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1563-AR-5

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Butterball LLC

Permit Number: 1563-AR-6

AFIN: 44-00069

			<table><tr><th>Old Permit</th><th>New Permit</th></tr><tr><td>33.7</td><td>33.7</td></tr></table>	Old Permit	New Permit	33.7	33.7
Old Permit	New Permit						
33.7	33.7						
\$/ton factor	27.27	Permit Predominant Air Contaminant					
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0				
Minimum Initial Fee \$	500						
		Permit Fee \$	0				
Check if Administrative Amendment	<input checked="" type="checkbox"/>	Annual Chargeable Emissions (tpy)	33.7				

Pollutant (tpy)	Old Permit	New Permit	Change
PM	3.2	3.2	0
PM ₁₀	3.2	3.2	0
PM _{2.5}	0	0	0
SO ₂	2	2	0
VOC	3	3	0
CO	30.6	30.6	0
NO _x	33.7	33.7	0
Single HAP	0.17	0.17	0
Total HAP	0.17	0.17	0