

STATEMENT OF BASIS
for the issuance of Draft Air Permit # 1582-AR-4

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

ConAgra Frozen Foods
3100 East Main Street
Russellville, Arkansas 72801

3. PERMIT WRITER:

Richard Nissen

4. PROCESS DESCRIPTION AND SIC CODE:

NAICS Description: Manufacturer of Frozen Dinners and other frozen foods specialties
NAICS Code: 311412

5. SUBMITTALS:

May 15, 2003

6. REVIEWER'S NOTES:

This modification provides the following:

- Permits the use of diesel oil as a back up for the largest four boilers (SN-23, SN-24, SN-25 and SN-37) during periods of natural gas curtailment. Production will not increase and there are no equipment changes.
- Additionally, the boiler numbers associated with source numbers are changed to be consistent with the plant designation.
 - SN-23 Boiler #1 (1200 hp) goes to Boiler #4,
 - SN-24 Boiler #2 (500 hp) goes to Boiler #1,
 - SN-25 Boiler #3 (500 hp) goes to Boiler #2,
 - SN-26 Boiler #4 (350 hp) goes to Boiler #3, and
 - SN-37 Boiler #5 (600 hp) goes to Boiler #5.
- Revises emission calculations for the boilers reflecting the most recent emissions factors available for natural gas fired boilers from AP-42. The only emissions increase with respect to this recalculation is the carbon monoxide emission, which shows an overall increase of 14.5 tons per year.

7. COMPLIANCE STATUS:

The facility is operating in compliance at the time of the review of this permit.

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8. APPLICABLE REGULATIONS:

A. Applicability

Did the facility undergo PSD review in this permit (Y/N) N

Has this facility underwent PSD review in the past (Y/N) N Permit # _____

Is this facility categorized as a major source for PSD? (Y/N) N

\$ 100 tpy and on the list of 28 (100 tpy)? (Y/N) N

\$ 250 tpy all other (Y/N)

B. PSD Netting

Was netting performed to avoid PSD review in this permit? (Y/N) N

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

C. Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation
SN's 35, 37	---	40 CFR 60, Subpart Dc

9. EMISSION CHANGES:

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

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 1582-AR-3	Air Permit 1582-AR-4	Change*
PM/PM ₁₀	16.3	13.5	-2.8
SO ₂	6.3	6.2	-0.1
VOC	9.3	8.6	-0.7
CO	54.0	60.4	16.1
NO _x	95.3	81.5	-13.8
Ammonia	60.0	60.0	0

* Several numbers appear to have been incorrectly added in previous permits.

10. MODELING:

A. 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.

B. Non-Criteria Pollutants

Pollutant	PAIL mg/m3	Modeled Concentration mg/m4	Pass? (Yes/No)
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NH4	0.1741	0.117 (calcs for prmt R4)	Yes
PAIL = 1/100 of the Threshold Limit Value (TLV)			

11. CALCULATIONS:

SN	Emission Factor Source	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
23, 24, 25, 37	AP-42 for diesel combustion	NO _x : 0.1 lb/MMBtu PM/PM ₁₀ : 0.0076lb/MMBtu SO ₂ : 0.0006lb/MMBtu VOC: 0.0055lb/MMBtu CO: 0.084lb/MMBtu	none	N/A	
35	AP-42 for natural gas combustion	varied*	none	N/A	*This was from a previous SOB.
36	mass balance	purchase of 120,000 lbs/yr ammonia	none	N	These are non-point source losses from things like valves, leaks, etc in the refrigeration system.
37	AP-42 for Natural Gas Combustion Manufacturer's guarantee	NO _x : 2.46 lb/hr PM/PM ₁₀ : 0.251 lb/hr SO ₂ : 0.025 lb/hr VOC: 0.402 lb/hr CO: 3.77 lb/hr	none	N/A	They used the higher of the two numbers.

All other sources were permitted in previous permits.

12. TESTING REQUIREMENT:

There is no testing required in this permit.

13. MONITORING OR CEMS

The following are parameters that must be monitored with CEMs or other monitoring equipment (temperature, pressure differential, etc), frequency of recording and whether

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records are needed to be included in any annual, semiannual or other reports.

SN	Parameter or Pollutant to be Monitored	Method of Monitoring (CEM, Pressure Gauge, etc)	Frequency	Report (Y/N)
35, 37	Natural Gas Usage	meter	monthly	N
23, 24, 25, 37	Diesel Fuel Usage	Deliveries to the Facility	Per delivery	Y

14. 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)
36	Ammonia usage	120,000 lbs	annual	N
23, 24, 25, 26	Prorated Diesel Fuel Usage	500,000 annually	Monthly	Y
	Diesel Fuel Sulfur Content	<0.05% by weight	Annually	Y

15. OPACITY

SN	Opacity	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
All	5%	Department Guidance	---

16. DELETED CONDITIONS:

The following Specific Conditions were included in the previous permit, but deleted for the current permitting action.

Former SC	Justification for removal
---	Not Applicable

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VOIDED, SUPERSEDED OR SUBSUMED PERMITS

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

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17. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

P. Murphy, P.E.