

STATEMENT OF BASIS

For the issuance of Draft Air Permit #1582-AR-5 AFIN: 58-00263

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

ConAgra Frozen Foods
3100 East Main Street
Russellville, Arkansas 72801

3. PERMIT WRITER:

Paul Osmon

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: Frozen Food Specialty Manufacturer
NAICS Code: 311412

5. SUBMITTALS:

February 23, 2005

6. REVIEWER'S NOTES:

SN-35 and SN-37 are subject to New Source Performance Standards, 40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

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 known active/pending enforcement actions or recent compliance activities.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
 Has the facility undergone PSD review in the past? N
 Is the facility categorized as a major source for PSD? N
 ≥ 100 tpy and on the list of 28? N
 ≥ 250 tpy all other? N
 PSD Netting
 Was netting performed to avoid PSD review in this permit? N

Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-35 and SN-37	NO _x & CO	40 CFR Part 60, Subpart Dc

9. EMISSION CHANGES:

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

Plantwide Permitted Emissions (tpy)			
Pollutant	Permit #1582-AR-4	Permit #1582-AR-5	Change
PM	13.5	21.6	8.1
PM ₁₀	13.5	21.6	8.1
SO ₂	6.2	6.3	0.1
VOC	8.6	17.9	9.3
CO	60.4	65.0	4.6
NO _x	81.5	87.0	5.5
Ammonia	60.0	60.0	0

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. (

Non-Criteria Pollutants:

2nd Tier Screening (PAIL)

ISCST3 air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
NH ₃	0.1741	0.117 (calcs for prmt R4)	Yes

Other Modeling:

Odor:

Odor modeling for sources emitting styrene. – No styrene emissions.

H₂S Modeling: No hydrogen sulfide emissions.

11. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
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	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
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 40	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.
38	Missouri DNR factors	PM/PM ₁₀ : 0.23 lb/ton processed	None	NA	Emission factor uncontrolled
39	South Coast AQMD factors	PM/PM ₁₀ : 0.03 lb/1000 lb processed VOC: 0.402 lb/1000 lb processed	Scrubber	-	Emission factor controlled

All other sources were permitted in previous permits.

12. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
No testing requirements				

13. 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)
35, 37	Natural Gas Usage	Meter allocation	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, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	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 for limit	Compliance Mechanism
SN-01, SN-02, SN-03, SN-04, SN-05, SN-06, 2N-23, SN-24, SN-25, SN-26, SN-31, SN-34, SN-35, SN-36, SN-37, SN-38, SN-40	5%	Department Standard	Natural Gas Fuel Used
SN-39	20%	Department Standard	Control Equipment Operation
23, 24, 25, 26 (Diesel Fuel)	20%	Department Standard	Fuel Used

16. DELETED CONDITIONS:

Former SC	Justification for removal
None	NA

17. VOIDED, SUPERCEDED, OR SUBSUMED PERMITS:

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

Permit #
1352-AR-4

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

Thomas Rheume, P.E.