

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1582-AR-9 AFIN: 58-00263

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

ConAgra Foods, Inc. (ConAgra Frozen Packaged Foods)  
3100 East Main Street  
Russellville, Arkansas 72801

3. PERMIT WRITER:

Melisha Griffin

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Frozen Specialty Food Manufacturing  
NAICS Code: 311412

5. SUBMITTALS:

6/4/2013

6. REVIEWER'S NOTES:

In this modification, the facility is installing a new line called the Cortina Line (SN-46) that will manufacture sauces. The changes resulted in emissions increases of 0.9 tpy of PM/PM<sub>10</sub>, 0.1 tpy of SO<sub>2</sub>, 0.7 tpy of VOC, 10.3 tpy of CO, and 12.2 tpy of NO<sub>x</sub>.

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 at this time.

8. PSD APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)?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, or*
  - *CO<sub>2e</sub> potential to emit ≥ 100,000 tpy and ≥100 tpy/≥250tpy of combined GHGs?*

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

9. GHG MAJOR SOURCE (TITLE V):

Indicate one:

- Facility is classified as a major source for GHG and the permit includes this designation
- Facility does not have the physical potential to be a major GHG source
- Facility has restrictions on GHG or throughput rates that limit facility to a minor GHG source. Describe these restrictions: \_\_\_\_\_

10. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-37, SN-41, SN-42, SN-43, SN-44 and SN-45	NO <sub>x</sub> & CO	40 CFR Part 60, Subpart Dc

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

a) NAAQS:

- (i) List the reason for a NAAQS evaluation (i.e. what changes are being permitted that would require the evaluation) and pollutants affected. If a NAAQS evaluation is not required, indicate why not.

This permitting action is for a Minor Source. Criteria pollutants were not evaluated for impacts on the NAAQS.

b) Non-Criteria Pollutants:

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value

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(mg/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
N/A				

2<sup>nd</sup> Tier Screening (PAIL)

AERMOD 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 (µg/m <sup>3</sup> ) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m <sup>3</sup> )	Pass?
NH <sub>3</sub>	0.1741	0.117 (calcs for prmt R4)*	Yes

\* Modeling performed with ISCST3

Other Modeling: N/A

Odor:

H<sub>2</sub>S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H<sub>2</sub>S Standards Y/N

If exempt, explain: \_\_\_\_\_

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H <sub>2</sub> S	20 parts per million (5-minute average*)		
	80 parts per billion (8-hour average) residential area		
	100 parts per billion (8-hour average) nonresidential area		

\*To determine the 5-minute average use the following equation

$$C_p = C_m (t_m/t_p)^{0.2} \text{ where}$$

$C_p$  = 5-minute average concentration

$C_m$  = 1-hour average concentration

$t_m$  = 60 minutes

$t_p$  = 5 minutes

13. CALCULATIONS:

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, 41, 42, 43, 44, and 45	AP-42 for Natural Gas Combustion  Manufacturer's guarantee	NO <sub>x</sub> : 2.46 lb/hr PM/PM <sub>10</sub> : 0.251 lb/hr SO <sub>2</sub> : 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 <sub>10</sub> : 0.23 lb/ton processed	None	NA	Emission factor uncontrolled
39	South Coast AQMD factors	PM/PM <sub>10</sub> : 0.03 lb/1000 lb processed VOC: 0.402 lb/1000 lb processed	Scrubber	99	Emission factors uncontrolled

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
46	AP-42 Natural Gas Combustion Factors	<u>lb/MMBtu</u> PM/MP <sub>10</sub> = 7.6 SO <sub>x</sub> = 0.6 VOC = 5.5 CO = 84.0 NO <sub>x</sub> = 100	None	N/A	Uncontrolled

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

15. 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)
37, 40, 41, 42, 43, 44, and 45	Natural Gas Usage	Meter allocation	monthly	N

16. 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)
36	Ammonia usage	120,000 lbs	annual	N
39	Poultry Processing	52,000,000	consecutive 12 Months	N

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17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
SN-01, SN-02, SN-03, SN-04, SN-05, SN-06, SN-31, SN-34, SN-36, SN-37, SN-38, SN-40,	5%	Department Standard	Natural Gas Fuel Used
SN-39	20%	Department Standard	Control Equipment Operation

18. DELETED CONDITIONS:

Former SC	Justification for removal
None	

19. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/ PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
(2) 0.5 MMBTU/hr Rotary Branding Wheels	A-1	0.03	0.0026	0.02	0.36	0.43	0.01	0.01
(1) 0.85 MMBTU/hr Enchilada Oven	A-1	0.03	0.0022	0.02	0.31	0.37	0.01	0.01
(2) 1.5 MMBTU/hr Tortilla Ovens	A-1	0.09	0.05	0.05	0.57	0.66	0.01	0.01
(1) 3.0 MMBTU/hr Rotary Branding Wheel	A-1	0.10	0.0077	0.07	1.08	1.26	0.03	0.03
(1) 2.5 MMBTU/hr Egg Roll Fryer	A-1	0.08	0.0064	0.06	0.90	1.07	0.02	0.02
(1) 1.2 MMBtu/hr Rotary Brander #1	A-1	0.05	0.05	0.05	0.44	0.53	0.02	0.02
Bulk Material Handler	A-13	0.15						

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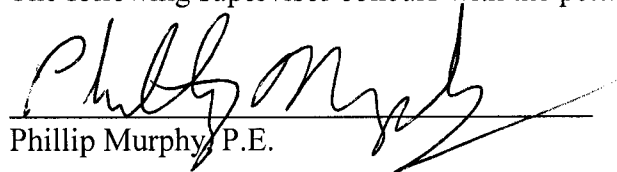
20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1582-AR-8

21. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

  
Phillip Murphy, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION



## Fee Calculation for Minor Source

Revised 08-26-13

Facility Name: Conagra Foods, Inc.  
 (Conagra Frozen Pkg. Foods)  
 Permit Number: 1582-AR-9  
 AFIN: 58-002663

			Old Permit	New Permit
\$/ton factor	23.42	Permit Predominant Air Contaminant	70.3	82.5
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	12.2	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	82.5	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	21.2	22.1	0.9
PM <sub>10</sub>	21.2	22.1	0.9
SO <sub>2</sub>	7.3	7.4	0.1
VOC	13.6	14.3	0.7
CO	78.3	88.6	10.3
NO <sub>x</sub>	70.3	82.5	12.2
Chromium, hex	0.001	0.001	0
Ammonia	60	60	0