

ADEQ MINOR SOURCE AIR PERMIT

Permit No. : 1745-AR-2

IS ISSUED TO:

Simmons Foods, Inc.
316 N. Hico St.
Siloam Springs, AR 72761
Benton County
AFIN: 04-00095

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates
Chief, Air Division

Date

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

Table of Contents

Section I: FACILITY INFORMATION..... 4
Section II: INTRODUCTION..... 5
 Summary of Permit Activity..... 5
 Process Description..... 5
 Regulations 6
 Total Allowable Emissions 6
Section III: PERMIT HISTORY 7
Section IV: EMISSION UNIT INFORMATION..... 8
 NSPS Conditions 9
Section V: INSIGNIFICANT ACTIVITIES 11
Section VI: GENERAL CONDITIONS 12
Appendix A

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SO ₂	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

Section I: FACILITY INFORMATION

PERMITTEE: Simmons Foods, Inc.

AFIN: 04-00095

PERMIT NUMBER: 1745-AR-2

FACILITY ADDRESS: 316 N. Hico St.
Siloam Springs, AR 72761

MAILING ADDRESS: PO Box 430
Siloam Springs, AR 72761

COUNTY: Benton

CONTACT POSITION: Joe Earney

TELEPHONE NUMBER: (479) 524-8151

REVIEWING ENGINEER: Shawn Hutchings

UTM North South (Y): Zone 15: 4005.71

UTM East West (X): Zone 15: 362.23

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

Section II: INTRODUCTION

Simmons Foods, Inc. operates a chicken processing and petfood plant located at 316 N. Hico Street, Siloam Springs, Arkansas 72761.

Summary of Permit Activity

This permit adds a 31.5 MMBTU/hr natural gas fired boiler, SN-04 to the facility. Simmons also added a source to account for emissions from grain screening, SN-05, and a 15 MMBTU/hr Industrial Hot Water Heater which is also natural gas fired. Both these sources are existing at the facility. They were left off previous modifications because Simmons thought they were insignificant at the time.

Process Description

Poultry Processing Plant

Live chickens are delivered to the receiving area by flat bed trucks and remain there until scheduled for the kill department. The birds are then unloaded and transferred via conveyor line to the kill room. There they are stunned and killed then proceed through the scalders in the scalding room. Three natural gas fired boilers, SN-01, 02, and 04, provide steam to the scalders. The line proceeds to the picking room for feather removal. The birds are routed through a final wash and then feet and heads are removed. They are deposited into a bird sorter system to be sorted by weight and delivered to the evisceration area. They proceed through the evisceration area and are then removed from the line. Next the birds are inspected and routed to the chillers. After the chillers, the birds are sized and placed with ice into tubs to be sent to cut-up or to further processing locations.

Pet Food

Grain is unloaded from trucks into silos. Fugitive particulate matter emissions occur when the grain is unloaded, SN-03. Grain from the silos is transferred via enclosed augers and cleaned by passing through vibrating screens. Emissions from grain cleaning are controlled with a fabric filter, SN-05. The grain is then weighed and routed to batch mixers. Beef parts and other ingredients are received by truck. These ingredients are combined with the grain and poultry offal from the processing plant in the batch mixers. The batches are mixed and heated. The mixed ingredients are routed to the filler and capper where cans are filled with the formulation and capped. The filled cans are sent to Retort cookers. After cooking, the cans are allowed to cool and then labeled and cased. The cased product is transferred to the warehouse for storage and shipment.

Source numbers SN-01, 02, and 04 are natural gas fired boilers that provide steam to the mixers and cookers. Source number SN-06 is a direct contact industrial hot water heater that provides wash down water to the facility.

Simmons Foods, Inc.
 Permit #: 1745-AR-2
 AFIN: 04-00095

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004
40 CFR Part 60 Subpart Dc, <i>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.</i>

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Total Allowable Emissions

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	14.3	5
PM ₁₀	5.2	3.7
SO ₂	0.4	0.4
VOC	0.5	2.1
CO	8.3	31.4
NO _x	10.1	37.4

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

Section III: PERMIT HISTORY

Permit No. 1745-A was issued November 25, 1997 which was the initial permit for this facility. The initial permit limits were PM/ PM₁₀ - 2.56 tpy, SO₂ - 0.08 tpy, VOC - 0.04 tpy, CH₄ - 0.42 tpy, CO - 4.68 tpy, and NO_x - 18.72 tpy.

Permit 1745-AR-1 was issued July 26, 1999. This is the first amendment to the air permit issued for the facility. It is issued to adjust the limit on the quantity of grain allowed to be unloaded at the facility and to adjust the particulate matter limits associated with this grain unloading.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 19, §19.501 et seq., effective December 19, 2004 and A.C.A. §8-4-203 as
 referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	26.78 MMBtu/hr Boiler	PM ₁₀	0.2	0.8
		SO ₂	0.1	0.1
		VOC	0.1	0.6
		CO	2.2	8.4
		NO _x	2.7	10.0
02	26.78 MMBtu/hr Boiler	PM ₁₀	0.2	0.8
		SO ₂	0.1	0.1
		VOC	0.1	0.6
		CO	2.2	8.4
		NO _x	2.7	10.0
03	Grain Receiving	PM ₁₀	4.4	0.7
04	31.5 MMBtu/hr Boiler	PM ₁₀	0.2	0.9
		SO ₂	0.1	0.1
		VOC	0.2	0.6
		CO	2.6	9.9
		NO _x	3.2	11.8
05	Grain Screening	PM ₁₀	0.1	0.1
06	15 MMBtu/hr Industrial Hot Water Heater	PM ₁₀	0.1	0.4
		SO ₂	0.1	0.1
		VOC	0.1	0.3
		CO	1.3	4.7
		NO _x	1.5	5.6

2. The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as
 referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	26.78 MMBtu/hr Boiler	PM	0.2	0.8
02	26.78 MMBtu/hr Boiler	PM	0.2	0.8

Simmons Foods, Inc.
 Permit #: 1745-AR-2
 AFIN: 04-00095

03	Grain Receiving	PM	13.5	2.0
04	31.5 MMBtu/hr Boiler	PM	0.2	0.9
05	Grain Screening	PM	0.1	0.1
06	15 MMBtu/hr Industrial Hot Water Heater	PM	0.1	0.4

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
01, 02, 04, 05, 06	5%	18.501
03	20%	19.503

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. The permittee shall not process more than 22,656 tons of grain at the grain receiving, SN-03 in any consecutive 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition 6. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. Natural gas usage at the facility shall not exceed 749,249,280 scf of natural gas in any consecutive 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

NSPS Conditions

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

9. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition 8. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.304 and 40 CFR Part 60, Subpart Dc]

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated March 3, 2006.

Description	Category
Laser Code Dater	A-13

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913

Little Rock, AR 72219

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee will provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences,

including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated '8 1 106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

APPENDIX A

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095

Simmons Foods, Inc.
Permit #: 1745-AR-2
AFIN: 04-00095