

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1745-AR-3 AFIN: 04-00095

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Simmons Foods, Inc.
316 N. Hico St.
Siloam Springs, Arkansas 72761

3. PERMIT WRITER:

Franck Houenou

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Poultry Processing
NAICS Code: 311615

5. SUBMITTALS:

Date of Application	Type of Application (New, Renewal, Modification, De Minimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
12/2/2015	De Minimis	Installation of a new boiler and a new industrial hot water heater. Also, two existing diesel storage tanks are being added to the permit.

6. REVIEWER'S NOTES:

Simmons Foods, Inc. operates a chicken processing and pet food plant located at 316 N. Hico Street, Siloam Springs, Arkansas 72761. This permit is for a De Minimis modification to air permit 1745-AR-2. The facility is installing a new boiler and a new industrial hot water heater. Also, two existing diesel storage tanks are being added to the permit. The new boiler will be at a new emission point SN-07. The new industrial hot water heater and the two existing diesel storage tanks are considered insignificant activities. The new boiler will be subject to provisions of 40 C.F.R. § 60, Subpart Dc.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

Currently, there are no active/pending enforcement actions or recent compliance issues.

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*

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

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-01, SN-02, SN-06 and SN-07	NO _x	40 C.F.R. § 60, Subpart Dc

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H₂S 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 H₂S Standards N

If exempt, explain: No H₂S emission

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01, 02, 06, 07	AP-42 for Natural Gas combustion, Uncontrolled Small Boilers (<100)	Varied	None	N/A	N/A

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A	N/A	N/A	N/A	N/A

14. 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)
N/A	N/A	N/A	N/A	N/A

15. 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)
01, 02, 06, and 07	Natural gas usage	749,249,280 scf	Monthly	N
07	Date of construction and actual startup	N/A	Each 6-month period	Y
01, 02, 06, and 07	Fuel supply certification	N/A	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01, 02, 06, and 07	Amount of each fuel combusted	N/A	Operating day or Calendar month	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 06, and 07	5%	Department Guidance	Natural Gas Combustion

17. DELETED CONDITIONS:

Former SC	Justification for removal
#6 and #7	SN-03 has been removed

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Laser Code dater	A-13							
8.0 MMBtu/hr Industrial Hot Water Heater	A-1	0.26	0.02	0.19	2.87	3.42		0.06
Diesel Storage Tanks (2)	A-3			0.01				

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1745-AR-2

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 08-26-15

Facility Name:
 Permit Number:
 AFIN:

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	37.4	32.8
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	-4.6	
Minimum Initial Fee \$	500			
		Permit Fee \$	400	
Check if Administrative Amendment <input type="checkbox"/>		Annual Chargeable Emissions (tpy)	32.8	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	5	2.6	-2.4
PM ₁₀	3.7	2.6	-1.1
SO ₂	0.4	0.4	0
VOC	2.1	1.9	-0.2
CO	31.4	27.5	-3.9
NO _x	37.4	32.8	-4.6