

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1745-AR-5 AFIN: 04-00095

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

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

3. PERMIT WRITER:

Derrick Brown

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Poultry Processing
NAICS Code: 311615

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
11/27/2019	Administrative Amendment	Addition of a makeup air unit and a hot oil heater to the insignificant activity list. Also, this amendment changes the facility's name from Simmons Foods, Inc. to Simmons Pet Food.

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 amendment adds a 2.5 MMBtu/hr Hot Oil Heater and a Makeup Air Unit to the facility's Insignificant Activity's List. There will be no change in permitted emissions.

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/pending enforcement actions for this facility. The most recent inspection dated January 18, 2017 stated there were no compliance issues.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? N

b) Is the facility categorized as a major source for PSD? N/A

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), 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. PERMIT SHIELD – TITLE V PERMITS ONLY: N/A (Minor Source)

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

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: N/A

13. CALCULATIONS:

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

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None.				

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)
None.				

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)
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
01, 02, 06, and 07	Amount of each fuel combusted	N/A	Operating day or Calendar month	N

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17. OPACITY:

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

18. DELETED CONDITIONS:

Former SC	Justification for removal
No conditions deleted with this amendment.	

19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Cat.	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				
Bone Blower Loadout Spout	A-13	3.54						
Hot Oil Heater (2.5 MMBtu/hr)	A-1	0.08	0.01	0.06	0.90	1.07		0.02
Makeup Air Unit (<10 MMBtu/hr)	A-1	0.33	0.03	0.24	3.61	4.29		0.08

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1745-AR-4

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

