

STATEMENT OF BASIS

For the issuance of Air Permit # 1745-AR-9 AFIN: 04-00095

1. PERMITTING AUTHORITY:

Division 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:

Skylar Redman

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
9/18/2023	Deminimis	Removal of SN-02, addition of SN-15.

6. REVIEWER'S NOTES:

This permit action is to remove an existing 26.78 MMBtu/hr natural gas-fired boiler (SN-02) from the permit, and to add a new 30.938 MMBtu/hr natural gas-fired boiler to the list of named sources, as SN-15, and to remove the Pet Treats operations from the facility's process descriptions. The associated equipment (SN-01) is still in use and will remain on-site. This will only affect the process description and process flow diagrams. Permitted emissions will change as follows: an increase in 0.3 tpy of PM/PM<sub>10</sub>, 0.2 tpy of VOC, 2.8 tpy of CO, 3.3 tpy of NO<sub>x</sub>, and 0.3 tpy of total HAPs.

7. COMPLIANCE STATUS:

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

The facility was last inspected on April 26, 2022 with no violations identified.

[https://echo.epa.gov/detailed-facility-report?fid=110000453072&ej\\_type=sup&ej\\_compare=US](https://echo.epa.gov/detailed-facility-report?fid=110000453072&ej_type=sup&ej_compare=US)

8. PSD/GHG 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  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list*

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-01, SN-07, SN-10, SN-11, SN-13, SN-14, and SN-15	NOX	40 C.F.R. § 60, Subpart Dc
SN-12	HAPs	40 C.F.R. § 63, Subpart ZZZZ 40 C.F.R. § 60, Subpart III

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
N/A				

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 DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

The non-criteria pollutants listed below were evaluated. Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

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 Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (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?
POM	0.2	0.022	1.63E-03	Y
Arsenic Compounds	0.005	0.00055	2.82E-05	Y
Beryllium Compounds	32.0	3.52	1.69E-06	Y
Cadmium Compounds	0.002	0.00022	1.5506E-04	Y
Chromium Compounds	0.5	0.055	1.97E-04	Y
Cobalt Compounds	0.02	0.0022	1.18E-05	Y
Manganese Compounds	5.0	0.55	5.36E-05	Y
Mercury Compounds	0.01	0.0011	3.66E-05	Y
Nickel Compounds	0.1	0.011	1.06E-03	Y

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Selenium Compounds	0.2	0.022	3.38E-06	Y

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?
N/A			

c) 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  
 If exempt, explain: This facility does not produce H<sub>2</sub>S

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01, 07-11, 13, 15	AP-42 for Natural Gas combustion, Uncontrolled Small Boilers (<100)	Varied	None	N/A	N/A
14	AP-42 for Natural Gas combustion, Uncontrolled Small Boilers	PM/ PM <sub>10</sub> = 7.6 SO <sub>2</sub> = 0.6 VOC = 5.5 CO = 84 NO <sub>x</sub> = 100	None	N/A	N/A

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)
N/A				

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, 07-11, 13, 14, 15	Natural gas usage	1,271,006,000 scf/yr	Monthly	N
01, 07-11, 13, 14, 15	Fuel supply certification	N/A	Monthly	N
01, 07-11, 12, 13, 14, 15	Amount of each fuel combusted	N/A	Operating day or Calendar month	N
12	Diesel fuel usage Hours of operation	N/A	Monthly	N
		500	Monthly	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 06, 07-11, 13, 14, 15	5%	Department Guidance	Observation
12	20%	Department Guidance	Observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

## 19. GROUP A INSIGNIFICANT ACTIVITIES:

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

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
Hot Oil Heater (2.5 MMBtu/hr)	A-1	0.08	0.01	0.06	0.90	1.07	-	0.02
Makeup Air Unit (MAU) 1 (3.12 MMBtu/hr)	A-1	0.10	0.01	0.07	1.13	1.34	-	0.01
MAU 2 (3.768 MMBtu/hr)	A-1	0.12	0.01	0.09	1.36	1.62	-	0.02
MAU 3 (2.6 MMBtu/hr)	A-1	0.08	0.01	0.06	0.94	1.12	-	0.01
MAU 4 (2.6 MMBtu/hr)	A-1	0.08	0.01	0.06	0.94	1.12	-	0.01
MAU 5 (2.335 MMBtu/hr)	A-1	0.08	0.01	0.01	0.01	1.00	-	0.01
MAU 6 (2.335 MMBtu/hr)	A-1	0.08	0.01	0.01	0.01	1.00	-	0.01
Hot Water Heater (0.6 MMBtu/hr)	A-1	0.02	0.01	0.01	0.22	0.26	-	0.01
Hot Water Heater (0.6 MMBtu/hr)	A-1	0.02	0.01	0.01	0.22	0.26	-	0.01
Diesel Storage Tanks (2)	A-3	-	-	0.01	-	-	-	-
Laser Code Dater	A-13	-	-	-	-	-	-	-
Bone Blower Loadout Spout	A-13	3.54	-	-	-	-	-	-

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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-8





## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Simmons Pet Food,  
Inc.  
Permit Number: 1745-AR-9  
AFIN: 04-00095

			<b>Old Permit</b>	<b>New Permit</b>
\$/ton factor	28.14	Permit Predominant Air Contaminant	59.5	62.8
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	3.3	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	<u>400</u>	
		Annual Chargeable Emissions (tpy)	<u>62.8</u>	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	5	5.3	0.3
PM <sub>10</sub>	5	5.3	0.3
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	1.1	1.1	0
VOC	3.7	3.9	0.2
CO	49.8	52.6	2.8
NO <sub>x</sub>	59.5	62.8	3.3
Total HAP	0.6	0.85	0.25