

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2058-AR-2 AFIN: 75-00333

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
8001 National Drive
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Pet Solutions, LLC
10511 Gauge Road
Danville, Arkansas 72833

3. PERMIT WRITER:

Bryan Leamons

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description: 311613
NAICS Code: Independent Rendering Plant that produces animal feed ingredients from poultry by-products

5. SUBMITTALS: 4-12-05

6. REVIEWER'S NOTES:

Pet Solutions, LLC operates a poultry by-product plant near Danville. The purpose of the rendering facility is to transform inedible meat processing by-products from poultry processors into grease/oils and protein solids (bone meal) which can be used as ingredients in the animal feed processing industry. This modification permits a 600 bhp boiler and steam turbine generator for production of electricity to be used on-site. The boiler is permitted to combust wood waste, cardboard, and off-spec poultry by-products. This modification also corrects permitted emission rates and limits in relation to the natural gas boiler (SN-01). The boiler was previously permitted at heat input of 20 MMBtu/hr. It is now permitted at 25.1 MMBtu/hr.

7. COMPLAINT STATUS:

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

There is currently a CAO being drafted for numerous violations.

There is currently a CAO being drafted to allow for installation of the equipment of this modification.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

Has the facility undergone PSD review in the past? N

Is the facility categorized as a major source for PSD? N

 ≥ 100 tpy and on the list of 28? N

 ≥ 250 tpy all other? N

PSD Netting

Was netting performed to avoid PSD review in this permit? N

If so, indicate increases and decreases used in netting for PSD purposes only.

Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-05 SN-06	None, Recordkeeping only	NSPS Part 60, Subpart Dc Standards of Performance for Small Industrial-Commercial- Institutional Steam Generating Units

9. EMISSION CHANGES:

The following table summarizes plantwide emission changes associated with this permitting action.

Plantwide Permitted Emissions (tpy)			
Pollutant	Permit # 2058-AR-1	Permit #2058-AR-2	Change
PM	1.9	39.7	37.8
PM ₁₀	1.9	39.7	37.8
SO ₂	0.2	3.3	3.1
VOC	1.7	3.9	2.2
CO	19.3	96.5	77.2
NO _x	23.0	52.8	29.8

10. MODELING:

Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

11. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	AP-42	Natural Gas	None	n/a	
02	Source Deleted				
03	Estimate	n/a	n/a	n/a	Just odor abatement equipment
04	AP-42	Grain Loading	None	n/a	They used Grain loading to estimate the offloading of their product which shouldn't be as dusty.
05	AP-42	Natural Gas	None	n/a	
06	AP-42	wood factors	multiclone	n/a	test will verify CO and VOC

12. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
06	CO VOC NOx	10 25A 7E	initial only	no good data available

13. 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)
There were none.				

14. RECORD KEEPING 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)
03	ORP	200	Every 8 Hours	N
05	Natural Gas Usage	No limit	Monthly	N
06	cardboard fat meal sludge	15.8 tons per day 1.9 tons per day 4.8 tons per day 11.3 tons per day	daily	N

15. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01	5%	Natural Gas	SIP
04	5%	Unloading	SIP
05	5%	Natural Gas	SIP
06	20%	standard	SIP

16. DELETED CONDITIONS:

Former SC	Justification for removal
There were none.	

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17. VOIDED, SUPERCEDED, OR SUBSUMED PERMITS:

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

Permit #
2058-AR-1

18. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

Phillip Murphy, P.E.