

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2058-AR-4 AFIN: 75-00051

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Pet Solutions, LLC  
RR 1, Box 306, Mt. Tabor Rd.  
Danville, Arkansas 72833

3. PERMIT WRITER:

Parviz Mokhtari

4. PROCESS DESCRIPTION AND NAICS CODE:

NAICS Description:

Independent rendering plant that produces animal feed ingredients from poultry by-products

NAICS Code: 311613

5. SUBMITTALS: 10/14/2008

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. Pet Solutions requested an authorization to make the following changes to the permit:

1. To add another wet scrubber (SN-08) to the sealed cooking process on the north side of the main process building
2. To remove Specific Conditions 12 and 13.
3. To remove Specific Condition 14.

Items # 2: Specific Conditions 13 and 14 are not removed because the building pressure conditions should be monitored to ensure that proper pressure relationships are maintained.

Item #3: Specific Condition 14 is revised.

The permitted emission increase due to this modification is 0.4 tons per year (tpy) VOC.

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 known current active/pending enforcement actions or recent compliance activities related to this facility.

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 not PSD?

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

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

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. 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.

Non-Criteria Pollutants: N/A

Other Modeling: N/A

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	Removed From Service				
02	Removed From Service				
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 except for NOx (see comment on this Table)	Natural Gas	None	N/A	<ul style="list-style-type: none"> <li>Will use Landfill methane gas (emission calculation for NOx is based on an average (0.38 lb NOx /MMBTU) of a default emission factor range of 0.22 -0.54 lb NOx /MMBTU</li> <li>Initial performance test for NOx for the verification of the emission factors is required</li> </ul>
06	AP-42	Wood factors	Multiclone	N/A	test will verify CO and VOC (The initial performance test was performed on April 11, 2006)
07	AP-42	Dump pit Table 9.9.1-1	None	N/A	Max raw meal processed 17,000 tons/year
	AP-42	Conveyor & Handling	None	N/A	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		Table 9.9.1-2			
08	Estimate	N/A	Wet Scrubber	Not Rated	Wet Scrubber #2 for Odor Abatement equipment

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
05 (Using landfill gas)	NOx	7E	initial only	no good data available

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				

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)
03 & 08	ORP	200 mA	Every 8 Hours	N
05	Natural Gas Usage	No limit	Monthly	N
06	Cardboard Poultry fat Poultry meal Sludge	15.8 tons per day 1.9 tons per day 4.8 tons per day 11.3 tons per day	daily	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
07	Meal	3900 tons/12 consecutive month	monthly	N

16. OPACITY:

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
SN-04	5%	§18.501 of Regulation 18	----
SN-05	5%	§18.501 of Regulation 18	----
SN-06	20%	§19.503 of Regulation 19	----
SN-07	5%	§18.501 of Regulation 18	----

17. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

18. GROUP A INSIGNIFICANT ACTIVITIES

Source Name	Group A Category	Emissions (tpy)						HAPs	
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single	Total	
No Insignificant Activity was reported with this modification.									

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2058-AR-3

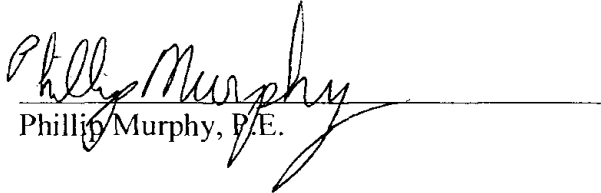
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20. CONCURRENCE BY:

The following supervisor concurs with the permitting decision.

  
Phillip Murphy, P.E.

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION





## Fee Calculation for Minor Source

Facility Name: Pet Solution  
 Permit Number: 2058-AR-4  
 AFIN:: 75-00051

			Old Permit	New Permit
\$/ton factor	22.07	Permit Predominant Air Contaminant	83.3	83.3
Minimum Fee \$	400	Net Chargeable Emission Increase	0	
Minimum Initial Fee \$	500	Permit Modification Fee \$	400	
		Initial Permit Fee \$	0	
Check if Administrative Amendment	<input type="checkbox"/>	Annual TPY Chargeable Emissions	83.3	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	41.8	41.8	0
PM <sub>10</sub>	41.4	41.4	0
SO <sub>2</sub>	3.2	3.2	0
VOC	3.6	3.6	0
CO	87.5	87.5	0
NO <sub>x</sub>	83.3	83.3	0

**Scanned**

JAN 07 2009

**Air Division**