

RESPONSE TO COMMENTS

**PET SOLUTIONS, LLC
PERMIT #2058-AR-7
AFIN: 75-00051**

The Director of the Arkansas Department of Environmental Quality gave issued a draft permitting decision for the above referenced facility on May 29, 2012. During the comment period, written comments on the draft permitting decision were submitted Ms. Leslie Davis, Project Manager, Harbor Environmental and Safety, on behalf of the facility, on behalf of the facility. The Department's response to these issues follows.

Note: The following page numbers and condition numbers refer to the draft permit. These references may have changed in the final permit based on changes made during the comment period.

Comment #1:

A notification letter, date May 3, 2012, has been sent to EPA and ADEQ for SN-10. Would it be acceptable to revise the permit to read as follows for Specific Condition (SC) #8?

8. Applicable requirements include the recordkeeping provisions of §60.48c for Boilers SN-05, SN-06 and SN-10. The permittee shall ~~submit~~ **maintain a copy on site of the notification of the date letter sent May 3, 2012, indicating** the date of construction, anticipating startup, actual startup for SN-10 ~~. This notification shall also include as well as~~ the design heat input capacity and ~~identification of the~~ **fuels to be combusted in Boiler SN-10**. These records shall be kept at the facility for the life of the equipment.
[Regulation 19 §19.304 and 40 CFR 60, Subpart Dc]

Response to Comment #1:

ADEQ agreed. Revised SC #8 will be as follows:

8. Applicable requirements include the recordkeeping provisions of §60.48c for Boilers SN-05, SN-06 and SN-10. The permittee shall maintain a copy on site of the notification letter sent May 3, 2012, indicating the date of construction, anticipating startup, actual startup for SN-10 as well as the design heat input capacity and fuels to be combusted in Boiler SN-10. These records shall be kept at the facility for the life of the equipment.
[Regulation 19 §19.304 and 40 CFR 60, Subpart Dc]

Comment #2:

The *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at Area Source Facilities (Subpart JJJJJ)* is currently under revision. The EPA recently published a proposed reconsideration of the Area Source Boiler Rule that would adjust the relevant initial compliance date for compliance with work practice and management

practice standards from March 21, 2012 to March 21, 2013. In addition, EPA has issued a No Action Assurance letter, dated March 12, 2012, which indicates that no enforcement action will be taken on facilities that do not meet the March 12, 2012 tune up requirement deadline. The condition may be revised to read:

22.
 - a. Conduct a tune-up of **Boiler SN-06 to demonstrate initial compliance with Subpart JJJJJJ**, no later than ~~March 21, 2012~~ **the compliance date specified in §63.11223**. Thereafter, a tune-up of Boiler SN-06 must be conducted biennially, as specified in §63.11223. [§63.11196(a)(1) and Table 2 to Subpart JJJJJJ of Part 63, item #3]

Response to Comment #2:

ADEQ agreed. Revised SC #22 will be as follows:

22.
 - a. Conduct a tune-up of Boiler SN-06 to demonstrate initial compliance with Subpart JJJJJJ, no later than the compliance date specified in §63.11223. Thereafter, a tune-up of Boiler SN-06 must be conducted biennially, as specified in §63.11223. [§63.11196(a)(1) and Table 2 to Subpart JJJJJJ of Part 63, item #3]

PC
July 5, 2012

ADEQ

A R K A N S A S
Department of Environmental Quality

July 19, 2012

Scott Clawson
Operations Director
Pet Solutions, LLC
10511 Gauge Road
Danville, AR 72833

Dear Mr. Clawson:

The enclosed Permit No. 2058-AR-7 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 4/9/2012.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 2058-AR-7 for the construction, operation and maintenance of an air pollution control system for Pet Solutions, LLC to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Mike Bates
Chief, Air Division

Enclosure

ADEQ MINOR SOURCE AIR PERMIT

Permit No. : 2058-AR-7

IS ISSUED TO:

Pet Solutions, LLC
10511 Gauge Road
Danville, AR 72833
Yell County

AFIN: 75-00051

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



Mike Bates
Chief, Air Division

July 19, 2012

Date

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

Table of Contents

Section I: FACILITY INFORMATION.....	4
Section II: INTRODUCTION	5
Summary of Permit Activity.....	5
Process Description.....	5
Regulations	7
Total Allowable Emissions.....	8
Section III: PERMIT HISTORY	9
Section IV: EMISSION UNIT INFORMATION.....	11
Natural Gas-fired Equipment – SN-05, 10, 11 and 14.....	15
NSPS Subpart Dc – SN-05, 06 and 10.....	15
Biomass-fired Boiler – SN-06	16
NESHAP Subpart JJJJJ Conditions - SN-06.....	19
Meal Handling and Load-out – SN-04, 07, 13 and 15.....	22
Scrubbers - SN-03, 08, 12A and 12B	22
Negative Facility Air Pressure Monitoring.....	24
Property Boundary Odor Monitoring	25
NESHAP Subpart CCCCC Conditions – SN-16	25
Section V: INSIGNIFICANT ACTIVITIES	27
Section VI: GENERAL CONDITIONS	28
APPENDIX A: 40 CFR 60 Subpart Dc	33
APPENDIX B: 40 CFR 63 Subpart JJJJJ.....	35
APPENDIX C: 40 CFR 63 Subpart CCCCC.....	37

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
BTU	British Thermal Unit
CFM	cubic feet per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
GDF	Gasoline Dispensing Facility
HAP	Hazardous Air Pollutant
IPT	Initial Performance Test
lb/hr	Pound Per Hour
MMBTU/hr	million BTUs per hour
MSDS	Material Safety data Sheet
mV	millivolt
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
RTO	Regenerative Thermal Oxidizer
SO ₂	Sulfur Dioxide
SPN	Secondary Protein Nutrient
tpy	Tons per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

Section I: FACILITY INFORMATION

PERMITTEE: Pet Solutions, LLC
AFIN: 75-00051
PERMIT NUMBER: 2058-AR-7

FACILITY ADDRESS: 10511 Gauge Road
Danville, AR 72833
MAILING ADDRESS: 10511 Gauge Road
Danville, AR 72833

COUNTY: Yell County
CONTACT NAME: Scott Clawson
CONTACT POSITION: Operations Director
TELEPHONE NUMBER: 479-576-2050

REVIEWING ENGINEER: Patty Campbell, PE
UTM North South (Y): Zone 15: 3883508.08 m
UTM East West (X): Zone 15: 482002.39 m

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

Section II: INTRODUCTION

Summary of Permit Activity

Pet Solutions, LLC (Pet) is a protein conversion facility located at 10511 Gauge Road Danville, Yell County, Arkansas 72833, southwest of Centerville and north of Ola. This permitting modification is necessary to:

1. Install two new wet Scrubbers (SN-12A and 12B) with 100,000 CFM fans;
2. Remove wet Scrubber SN-12C, which was never installed, from the permit;
3. Update Specific Condition (SC) #8 to confirm notification letter dated May 3, 2012 of SN-10 Boiler;
4. Update SC #26a to reflect requirement to conduct a tune-up of Boiler SN-06 to demonstrate initial compliance with Subpart JJJJJJ, no later than the compliance date specified in §63.11223;
5. Temporarily suspend monthly negative facility pressure monitoring, SC #34 and #35; and
6. Temporarily require daily odor monitoring at the property boundary, SC #36 and #37.

Total permitted annual emission change associated with this modification is: -0.5 tons per year (tpy) VOC.

Process Description

Pet Solutions provides a service to chicken producers by dehydrating and separating secondary protein nutrients (SPN) at a protein conversion facility producing grease/oils and protein solids (bone meal) utilized by the pet food industry.

Inedible Processing Lines

The primary feedstock of chicken meat, blood and feathers is trucked to the plant. After being pumped to a holding tank, the blood is sent to a coagulator and then to a centrifuge. The blood solids are separated from the "serum" liquid. The solids from the centrifuge are conveyed to a cyclone where the blood is mixed with hydrolyzed feathers prior to entering the dryer.

After being dumped into a closed feathers receiving bin and transferred to the feather hydrolyzer, the feathers are heated, agitated and reduced to wet slurry. Hydrolyzed feathers are separated from the flash vapors as they depart from the flash chamber and are mixed with blood solids in the cyclone. From the cyclone, mixed blood and hydrolyzed feathers are transferred to the dryer (SN-09). The dryer is an ASME certified steam vessel equipped with steam discs, not direct-fired. The dryer is listed with a source number in the event AP-42 factors change in the future. The dried feather/blood meal is milled and screened before being conveyed to the storage silos.

Other inedible material are dumped into a closed receiving bin and transported through a metal detection and removal process to one (1) of twelve batch cookers. The inedible cooking process consists of twelve (12) horizontal, cylindrical, non-pressurized vessels (batch cookers) equipped with steam jacket and non-steam agitator. The steam is provided by the natural gas boilers (SN-

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

05 and SN-10) and wood-fired boiler (SN-06) located in the Boiler Area. A new 73.6 MMBtu/hr natural gas-fired boiler (SN-10), a new 5.0 MMBtu/hr natural gas-fired Regenerative Thermal Oxidizer (RTO) (SN-11) and a new 5.0 MMBtu/hr natural gas-fired RTO (SN-14) will be installed. Materials placed in the cookers are dehydrated. Vapor is vented from the cookers and passes through an RTO (SN-11 and SN-14).

Upon completion of the cooking process, the materials are dumped into a drain pan. The drain pan separates the liquid fat from the protein solids. From the drain pan, the protein solids are conveyed to a press. The press completes the separation of fat from solids and yields protein solids. These solids are ground and screened to produce protein (bone or poultry) meal. Meal handling emissions for this line are designated SN-07.

Edible Processing Lines

Edible materials are received in open top trucks, totes, and trucks. Contents of the trucks are pumped directly to the cookers. Contents of open top trucks and totes are received at the receiving dock, dumped into the closed raw receiving bin and transported through a metal detection and removal process.

From this point, the material is transferred to the cookers in the Protein Recovery Area via a closed pipe pumping system. The Protein Recovery Area includes two (2) new large capacity continuous cookers, two (2) oil separators, two (2) surge bins, two (2) screw presses, two (2) centrifuges and two (2) coolers with bag house. The continuous cookers consist of two (2) horizontal, cylindrical, non-pressurized vessels (HM2266 batch cookers) equipped with an outer steam jacket and 66 steam discs. Again, the steam is provided by the facility boilers (SN-05, 06 and 10). Materials placed in the cookers are dehydrated thereby facilitating the separation of fats and proteins. Cooking time varies. Vapor is vented from the cookers and passes through an RTO (SN-11 and SN-14) to remove odor prior to discharge.

Materials from the cookers are dumped into one of two (2) pre-heated closed surge bins with mixing capability and transferred into one of two screw presses. The press completes the separation of fat from solids. These solids are ground and screened to produce protein meal. The meal is stored in holding bins located adjacent to the ship-out area (SN-13 and SN-15) after passing through the Milling Screening Room. Fat from the press and drain pan is processed in a centrifuge and pumped to the grease storage tanks for shipping. Both grease and bone/poultry meal are stored in silos and shipped from the load-out area.

All interior plant air will be exhausted through the wet scrubbers (SN-03, SN-08, SN-12A and SN-12B). Until the scrubbers are installed and started-up, but no later than July 15, 2012, daily odor monitoring of the outside boundary will be performed, in lieu of operating the scrubbers internally. Blow-down water from the scrubbers is directed to Pond 1.

Pet Solutions, LLC
 Permit #: 2058-AR-7
 AFIN: 75-00051

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 9, 2012
New Source Performance Standards, 40 CFR, Part 60, Subpart Dc, <i>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units</i> , SN-05, SN-06 and SN-10 (Appendix A)
40 CFR Part 63, Subpart JJJJJ, <i>National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at Area Source Facilities</i> , SN-06 (Appendix B) ¹
40 CFR Part 63, Subpart CCCCC – <i>National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities</i> , SN-16 (Appendix C)

¹40 CFR Part 63, Subpart JJJJJ applies to existing biomass-fired boilers located at area sources of HAPs (major sources are subject to Subpart DDDDD). NESHAP Subpart JJJJJ does not apply to natural gas or propane fired boilers. The final rule was effective 3/21/2011. Boilers that commenced construction on or before June 4, 2010 are considered an existing source.

Pet Solutions, LLC
 Permit #: 2058-AR-7
 AFIN: 75-00051

Total Allowable Emissions

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	12.3	46.2
PM ₁₀	11.1	40.9
SO ₂	1.2	3.3
VOC	1.8	7.2
CO	24.0	93.8
NO _x	14.2	57.9
Acetaldehyde	0.03	0.09
Acrolein	0.12	0.43
Arsenic	0.05	0.05
Benzene	0.16	0.49
Cadmium	0.05	0.05
Chlorine	0.03	0.09
Formaldehyde	0.17	0.54
Hexavalent Chromium	0.05	0.05
Hydrogen Chloride	0.55	2.03
Lead	0.05	0.05
Manganese	0.09	0.22
POM/PAH	0.05	0.05
Styrene	0.06	0.21

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

Section III: PERMIT HISTORY

Permit #2058-A (initially issued as Permit #864-A, AFIN: 75-03330) was issued to Pet Solutions, LLC on March 19, 2004. This facility was previously owned and operated by J & B Farms. In early 2002, J & B Farms ceased operation and voided the existing air permit. A new Permit Number and a new AFIN [75-00051] were issued. This permit allowed the new operator to reopen the facility and begin production. The facility was to be operated in the same manner as previously permitted without any new equipment.

Permit #2058-AR-1 (initially issued as Permit #864-1, AFIN: 75-00333) was issued to Pet Solutions, LLC on March 24, 2005. This modification removed one Natural Gas Boiler (SN-02) and installed a new Natural Gas Boiler (SN-05).

Permit #2058-AR-2 (AFIN: 75-00051) was issued to Pet Solutions, LLC on August 23, 2005. This modification permitted 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 corrected the permitted emission rates and limits in relation to natural gas boiler SN-01. The boiler permitted at heat input of 25.1 MMBtu/hr. The AFIN was changed to be the same as the ADEQ Water Division AFIN for this facility.

Permit #2058-AR-3 was issued to Pet Solutions, LLC on February 12, 2008. This permit modification authorized the following changes:

1. Remove Natural Gas Boiler SN-01 from service.
2. Install and operate 5 new cookers (will effect emissions from: SN-05 and SN-06);
3. Install additional storage bins (will effect emissions from: SN-04);
4. Install and operate meal elevators and aspirator (SN-07);
5. Include ash bin/conveyor system on the wood fired boiler (IA);
6. Include the wood chip/sawdust storage piles into the current permit (IA).
7. Allow the facility to burn landfill gas (methane) in the gas boiler.
8. Allow the close door condition to be removed for the east entrance door (process building) and the north entrance door (raw material storage building).

The overall annual permitted emissions increased 2.1 tpy PM, 1.7 tpy PM₁₀, and 30.5 tpy NO_x.

Permit #2058-AR-4 was issued to Pet Solutions, LLC on March 10, 2009. This permit modification authorized the following changes:

1. Add another wet scrubber (SN-08) to the sealed cooking process; and
2. SC #14 was revised.

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

Permit #2058-AR-5 was issued to Pet Solutions, LLC on September 13, 2010. Pet Solutions requested an authorization to allow usage of Balcones fuel cubes in the Wood Fired Boiler SN-06. The total change in emissions includes an increase of 4.9 tpy VOC and 0.62 tpy Total HAPs.

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

Permit #2058-AR-6 was issued to Pet Solutions, LLC on November 10, 2011. This permitting modification was necessary to:

1. Remove landfill gas as alternative fuel and remove stack test requirement at SN-05.
2. Install new 73.6 MMBtu/hr natural gas-fired, ultra-low NO_x burners, Boiler SN-10;
3. Permit SN-05, 10, 11 and 14 for natural gas combustion only;
4. Add applicable provisions of 40 CFR 60, Subpart Dc for SN-05, 06 and 10;
5. Add IPT for CO and NO_x hourly emissions at SN-10, SC #10;
6. Install a 5.0 and a 10.9 MMBtu/hr natural gas-fired RTOs (SN-11 and SN-14);
7. Limit Boiler SN-06 operating hours to not to exceed 7,488 hours per year;
8. Add IPT for PM/PM₁₀, CO and NO_x hourly emissions at SN-06, combusting wood only;
9. Clarify measurement choices of fuel usage in SN-06;
10. Require multiple cyclone fly ash arrestor to operate when SN-06 is operating;
11. Remove start-up notification of SN-06, as this requirement is complete;
12. Add applicable provisions of 40 CFR 63, Subpart JJJJJ - for Boiler SN-06, SC #21;
13. Add a work practice or management practice standard initial tune-up no later than March 21, 2012, plus biennially thereafter for Boiler SN-06;
14. Obtain a one-time energy assessment no later than March 21, 2014 for Boiler SN-06;
15. Add SN-06 recordkeeping requirements of the NCS and ACC Report;
16. Remove the meal aspirator from SN-07;
17. Revise emissions for Meal Handling based on increased throughput limit;
18. Add Load Out, Shipping and eleven Silos (SN-13) and add Meal Handling (SN-15);
19. Install three wet Scrubbers (SN-12A, 12B and 12C), add continuous monitored operating parameters and add a one-time VOC stack test of either Scrubber SN-12A, 12B or 12C;
20. Revise VOC emissions for existing Scrubbers SN-03 and 08 and add ORP monitoring;
21. Add a one-time VOC stack test for Scrubbers SN-03;
22. Clarify requirement and method to maintain negative pressure within the buildings;
23. Add two batch cookers with VOC emissions routed to RTO;
24. Add Blood/Feather Meal Process and edible Protein Processing Process. Pet will expand the existing building and reduce cookers SN-09 with emissions routed to RTO; and
25. Change the Gasoline Storage Tank from IA to SN-16 and incorporate 40 CFR 63 Subpart CCCCC requirements.

Total permitted annual emission changes associated with this modification are: 4.4 tpy PM, -0.5 tpy PM₁₀, 0.1 tpy SO₂, -0.9 tpy VOC, 6.3 tpy CO, -25.4 tpy NO_x, 0.09 tpy acetaldehyde, 0.43 tpy acrolein, 0.05 tpy arsenic, 0.49 tpy benzene, 0.05 tpy cadmium, 0.09 tpy chlorine, 0.05 tpy formaldehyde, 0.05 tpy hexavalent chromium, 2.03 tpy hydrogen chloride, 0.05 tpy lead, 0.22 tpy manganese, -0.08 tpy POM/PAH, 0.21 tpy styrene and -0.62 tpy Total HAPs.

Pet Solutions, LLC
 Permit #: 2058-AR-7
 AFIN: 75-00051

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 19 §19.501 et seq. and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
03	Wet Scrubber #1 (Horizontal Counter-flow, 100,000 CFM, installed 1997)	VOC	0.1	0.5
04	Load Out, Shipping & 4 Silos @ maximum 63,948 tons/yr	PM ₁₀	0.1	0.1
05	Cleaver-Brooks 800 hp Boiler (33.48 MMBtu/hr natural gas-fired, installed 2005)	PM ₁₀	0.3	1.1
		SO ₂	0.1	0.1
		VOC	0.2	0.9
		CO	2.8	12.1
		NO _x	3.3	14.5
06	Hurst Hybrid UF 600 hp Boiler (28.5 MMBtu/hr wood-fired & other approved combustibles, @ maximum 7,488 hrs/yr, start-up date 11/08/2005, mechanical collector with fly ash reinjection)	PM ₁₀	9.2	34.2
		SO ₂	0.8	2.7
		VOC	0.5	1.9
		CO	17.1	64.1
		NO _x	6.3	23.5
07	Meal Handling @ maximum 63,948 tons/yr (Grain Elevator)	PM ₁₀	0.3	1.1
08	Wet Scrubber # 2 (25,000 CFM, installed 2008)	VOC	0.1	0.5
10	Superior Boiler – Apache - Firetube (73.6 MMBtu/hr natural gas-fired, 2200 Hp, forced draft, ultra-low NO _x burners, 25% flue gas recirculation, future install 2011)	PM ₁₀	0.6	2.5
		SO ₂	0.1	0.3
		VOC	0.4	1.8
		CO	2.7	11.7
		NO _x	3.0	13.0

Pet Solutions, LLC
 Permit #: 2058-AR-7
 AFIN: 75-00051

SN	Description	Pollutant	lb/hr	tpy
11	Adwest Regenerative Thermal Oxidizer (5.0 MMBtu/hr natural gas-fired, future install 2011)	PM ₁₀	0.1	0.2
		SO ₂	0.1	0.1
		VOC	0.1	0.2
		CO	0.5	1.9
		NO _x	0.5	2.2
12A & B	Two Haarslev AS100 Packed-Bed Scrubbers (w/100,000 CFM fan each)	VOC	0.2	1.0
13	Load Out, Shipping and 11 Silos @ maximum 70,080 tons/yr (baghouse for load-out silos recirculates air back into silos)	PM ₁₀	0.1	0.1
14	Smith Regenerative Thermal Oxidizer (10.9 MMBtu/hr natural gas-fired, future install 2011)	PM ₁₀	0.1	0.4
		SO ₂	0.1	0.1
		VOC	0.1	0.3
		CO	0.9	4.0
		NO _x	1.1	4.7
15	Meal Handling @ maximum 70,080 tons/yr (Enclosed Piping System)	PM ₁₀	0.3	1.2
16	Gasoline Storage Tank (250 gallon capacity)	VOC	0.1	0.1
01, 02	Removed from Service.			
09	One Feather Hydrolyzer and Dryer (in-direct fired, no emissions).			
12C	Never installed. Removed from permit.			

2. The permittee shall not exceed the emission rates set forth in the following table.
 [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
04	Load Out, Shipping & 4 Silos @ maximum 63,948 tons/yr	PM	0.1	0.2

Pet Solutions, LLC
 Permit #: 2058-AR-7
 AFIN: 75-00051

SN	Description	Pollutant	lb/hr	tpy
05	Cleaver-Brooks 800 hp Boiler (33.48 MMBtu/hr natural gas-fired, installed 2005)	PM Arsenic Benzene Cadmium Formaldehyde Hexavalent Chromium Lead Manganese POM/PAH	0.3 0.01 0.01 0.01 0.01 0.01 0.01 0.01 0.01	1.1 0.01 0.01 0.01 0.02 0.01 0.01 0.01 0.01
06	Hurst Hybrid UF 600 hp Boiler (28.5 MMBtu/hr wood-fired & other approved combustibles, @ maximum 7,488 hrs/yr, start-up date 11/08/2005, mechanical collector with fly ash reinjection)	PM Acetaldehyde Acrolein Arsenic Benzene Cadmium Chlorine Formaldehyde Hexavalent Chromium Hydrogen Chloride Lead Manganese POM/PAH Styrene	10.0 0.03 0.12 0.01 0.12 0.01 0.03 0.13 0.01 0.55 0.01 0.05 0.01 0.06	37.4 0.09 0.43 0.01 0.45 0.01 0.09 0.47 0.01 2.03 0.01 0.18 0.01 0.21
07	Meal Handling @ maximum 63,948 tons/yr (Grain Elevator)	PM	0.5	2.0
10	Superior Boiler – Apache - Firetube (73.6 MMBtu/hr natural gas-fired, 2200 Hp, forced draft, ultra-low NO _x burners, 25% flue gas recirculation, future install 2011)	PM Arsenic Benzene Cadmium Formaldehyde Hexavalent Chromium Lead Manganese POM/PAH	0.6 0.01 0.01 0.01 0.01 0.01 0.01 0.01 0.01	2.5 0.01 0.01 0.01 0.03 0.01 0.01 0.01 0.01

Pet Solutions, LLC
 Permit #: 2058-AR-7
 AFIN: 75-00051

SN	Description	Pollutant	lb/hr	tpy
11	Adwest Regenerative Thermal Oxidizer (5.0 MMBtu/hr natural gas-fired, future install 2011)	PM Arsenic Benzene Cadmium Formaldehyde Hexavalent Chromium Lead Manganese POM/PAH	0.1 0.01 0.01 0.01 0.01 0.01 0.01 0.01 0.01	0.2 0.01 0.01 0.01 0.01 0.01 0.01 0.01 0.01
13	Load Out, Shipping and 11 Silos @ maximum 70,080 tons/yr (baghouse for load-out silos recirculates air back into silos)	PM	0.1	0.2
14	Smith Regenerative Thermal Oxidizer (10.9 MMBtu/hr natural gas-fired, future install 2011)	PM Arsenic Benzene Cadmium Formaldehyde Hexavalent Chromium Lead Manganese POM/PAH	0.1 0.01 0.01 0.01 0.01 0.01 0.01 0.01 0.01	0.4 0.01 0.01 0.01 0.01 0.01 0.01 0.01 0.01
15	Meal Handling @ maximum 70,080 tons/yr (Enclosed Piping System)	PM	0.5	2.2

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
05, 10, 11 & 14	5%	§18.501 and A.C.A. (natural gas only)
06	20%	§19.503 and A.C.A.
04, 07, 13 & 15	5%	§18.501 and A.C.A.

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18 §18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18 §18.901 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Natural Gas-fired Equipment – SN-05, 10, 11 and 14

6. The permittee shall use only pipeline quality natural gas as fuel in SN-05, 10, 11 and 14. Combustion emissions from all natural gas-fired equipment and boilers listed have been calculated at full load for continuous operation. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

NSPS Subpart Dc – SN-05, 06 and 10

7. This facility is considered an affected source and Boilers SN-05, SN-06 and SN-10 are subject to and must comply with the New Source Performance Standards (NSPS) 40 CFR 60 Subpart Dc - *Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units* (Appendix A). SN-05, 06 and 10 are each steam generating units for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr). [Regulation 19 §19.304 and 40 CFR 60, Subpart Dc]
8. Applicable requirements include the recordkeeping provisions of §60.48c for Boilers SN-05, SN-06 and SN-10. The permittee shall maintain a copy on site of the notification letter sent May 3, 2012, indicating the date of construction, anticipating startup, actual startup for SN-10 as well as the design heat input capacity and fuels to be combusted in Boiler SN-10. These records shall be kept at the facility for the life of the equipment. [Regulation 19 §19.304 and 40 CFR 60, Subpart Dc]
9. The permittee shall maintain monthly records of the quantity of natural gas consumed in each boiler, SN-05 and SN-10. This shall be achieved by either a separate flow meter or as a percentage and calculation of the total natural gas consumed at the facility based on BTU rating. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and be made available to Department personnel upon request. Fuel usage records shall be maintained for a period of two years following the date of such records. [Regulation 19 §19.304 and 40 CFR §60.48c(g), NSPS Subpart Dc]

Pet Solutions, LLC
 Permit #: 2058-AR-7
 AFIN: 75-00051

10. The permittee shall conduct an initial performance test (IPT) on Boiler SN-10 to demonstrate compliance with the CO and NO_x hourly emission limits specified in Specific Condition #1, in accordance with General Condition #7. EPA Reference Method 7E shall be used to determine NO_x emissions and EPA Reference Method 10 shall be used to determine CO emissions. The permittee shall test the boiler (SN-10) within 90% of its rated capacity. If the test is not performed within this range, the permittee shall be limited to operating within 10% above the tested rate. All performance test results shall be recorded, kept for the life of the boiler at the facility and submitted to the Department at the address in General Condition #6. [Regulation 19 §19.702 and 40 CFR Part 52, Subpart E]

Biomass-fired Boiler – SN-06

11. The permittee shall not exceed 7,488 hours operation of Hurst Hybrid biomass-fired Boiler SN-06 per rolling twelve month period. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
12. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #11. When SN-06 is not operating, the daily log shall so state. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on site and made available to Department personnel upon request. [Regulation 19 §19.703, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and §60.48c(a) of 40 CFR Part 60, Subpart Dc]
13. The permittee shall conduct a one-time, if successful, performance test (IPT) on the existing Hurst Hybrid Boiler (SN-06) within 180 days of issuance of Permit #2058-AR-6 and as otherwise stated in accordance with General Condition #7. The permittee must meet the applicable emission limits specified in the table below to be deemed successful. If one or more pollutants exceeds the maximum permitted emissions in the table below, or if the facility conducts significant modifications to Boiler SN-06, then the facility must conduct another complete stack test, until a successful test is achieved. The exhaust stack shall be tested for the following pollutants using the tabulated test methods:

Pollutant	EPA Reference Methods	Maximum Emission Rates (lb/hr)
PM	5	10.0
PM ₁₀	201A	9.2
CO	10	17.1
NO _x	7E	6.3

All tests shall be conducted with the Boiler (SN-06) operating at 90% or greater of its rated capacity with wood and wood-products as the only fuel. If the test is not performed within this range, the permittee shall be limited to operating within 10% above the tested rate. All performance test results shall be recorded, kept for the life of the unit at the facility and submitted to the Department at the address in General Condition #6. [Regulation 19 §19.702 and §19.501 and 40 CFR 52 Subpart E]

14. The permittee shall not combust material throughput in excess of the quantities listed in the table below in Boiler SN-06 on a monthly basis. As an alternative to meeting the requirements of §60.48c (g)(1), the permittee of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month. The materials listed below are either wood or materials not subject to an emissions standard (excluding opacity). Only materials listed below shall be used as fuel, unless otherwise approved by the Department. [Regulation 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 60, Subpart Dc, §60.48c(g)(2)]

Fuel Type Category for SN-06	Maximum Material Usage (tons)
Wood Waste, including wood chips, sawdust and/or ground pallets	Limited to maximum capacity of source
Cardboard	15.8 tons/day
Balcones Fuel Cubes	12.0 tons/day
Sludge	11.3 tons/day
Poultry Meal	4.8 tons/day
Poultry Fat	1.9 tons/day

15. The permittee shall maintain records for SN-06 to demonstrate compliance with Specific Condition #14. The usage weight of wood waste and Balcones Fuel Cubes may be determined by purchase receipts. The usage weight of wood waste shall be recorded monthly. The permittee shall weigh on a scale or otherwise accurately establish the tons per day usage for the other categories. Use of the permittee's on-site truck scale would be acceptable. The permittee shall update the daily records in a log daily and shall compile the monthly and twelve month period records by the fifteenth day of the month following the month to which the records pertain. These daily (for non-wood fuel), monthly and rolling 12 month records shall be kept in a spreadsheet or other well-organized format, maintained on-site for a period of 2 years following the date of each

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

record and made available to Department personnel upon request. [Regulation 19 §19.705, 40 CFR Part 52, Subpart E and 40 CFR 60, Subpart Dc, §60.48c(g)(2)]

16. Sludge is defined in this permit as secondary protein nutrients (SPN) consisting of solids, fats and moisture. SPN is a by-product of wastewater treatment at this facility. Only in-house sludge that meets this definition may be combusted as “sludge” by this facility and only in SN-06. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. Balcones Fuel Cubes are defined in this permit as recycled fiber product fire logs. The fuel cubes are a paper/cellulose based product obtained/purchased from Balcones Resources. Only fuel cubes that meet this definition may be combusted as Balcones Fuel Cubes by this facility. The permittee must comply with Specific Condition #18 prior to use of Balcones Fuel Cubes. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee conducted an IPT at SN-06 fueled by Poultry Fat on April 11, 2006 for the following pollutants, VOC, CO and NO_x, and demonstrated compliance with the corresponding emission limits listed in Specific Condition #1. Poultry fat testing was conducted in accordance with Permit #2058-AR-2 and 40 CFR 60, Subpart Dc. At the time of issuance of Permit #2058-AR-6, no other IPT test has been conducted on SN-06. A future IPT of Balcones Fuel Cubes (between 900 and 1,000 pounds per hour) shall be required prior to use, in accordance with General Condition #7. All performance test results shall be recorded, kept for the life of the unit at the facility and submitted to the Department at the address in General Condition #6. [Regulation 19 §19.702 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
19. A multiple cyclone (multi-clone) fly ash arrestor (cyclone system) control device must be in use at all times that Boiler SN-06 is operating. The cyclone system shall be operated and maintained in accordance with the manufacturer’s specifications and good operating practices. [Regulation 19 §19.303 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
20. The permittee shall not combust trash, garbage, refuse or other materials in SN-06 received from off-site that could be considered relevant in defining the facility as a municipal or hazardous waste combustor. The cardboard and pallets listed in Specific Condition #14 may only originate as packaging materials from the poultry and swine process shipment receipts. No plastic or foam of any kind or type shall be combusted in Boiler SN-06, whether it is intentional or incidental leftovers from within the cardboard shipping materials. Although ground pallets are permitted as wood fuel, no pallet grinding process has been permitted by this permit. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

NESHAP Subpart JJJJJ Conditions - SN-06

21. The permittee shall comply with all applicable provisions of 40 CFR 63, Subpart JJJJJ - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at Area Source Facilities* (Appendix B). The facility operates an industrial biomass boiler (SN-06) as defined in §63.11237 and is an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195. An affected source is an existing source if it commenced construction or reconstruction of the affected source on or before June 4, 2010. SN-06 commenced installation in 2005. [Regulation 19 §19.304 and 40 CFR 63, Subpart JJJJJ, §63.11193, and §63.11194 (a)(1-2) and (b)]

22. The permittee must comply with each work practice standard, emission reduction measure and management practice specified in Table 2 to Subpart JJJJJ of Part 63 that applies to an existing biomass boiler (SN-06). An energy assessment completed on or after January 1, 2008 that meets the requirements in Table 2 to Subpart JJJJJ of Part 63 satisfies the energy assessment portion of this requirement. The permittee must meet the following requirements for SN-06: [Regulation 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and §63.11201(b)]
 - a. Conduct a tune-up of Boiler SN-06 to demonstrate initial compliance with Subpart JJJJJ, no later than the compliance date specified in §63.11223. Thereafter, a tune-up of Boiler SN-06 must be conducted biennially, as specified in §63.11223. [§63.11196(a)(1) and Table 2 to Subpart JJJJJ of Part 63, item #3]
 - b. Must have a one-time energy assessment performed by a qualified energy assessor no later than March 21, 2014. The energy assessment for SN-06 must include: [§63.11196(a)(3) and Table 2 to Subpart JJJJJ of Part 63, item #4, (1) through (7)]
 - i. A visual inspection of the boiler system;
 - ii. An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
 - iii. Inventory of major systems consuming energy from affected boiler;
 - iv. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
 - v. A list of major energy conservation measures;
 - vi. A list of the energy savings potential of the energy conservation measures identified; and
 - vii. A comprehensive report detailing the ways to improve efficiency, the cost specific improvements, benefits, and the time frame for recouping those investments.

23. The permittee must conduct a biennial performance tune-up of the Boiler (SN-06) according to §63.11223(b) and keep records as required in §63.11225(c) to demonstrate continuous compliance with the work practice standard or the management practices of a

tune-up. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. The tune-up of the Boiler (SN-06) biennially must be conducted as specified in §63.11223 (b)(1) through (7) as follows: [§63.11223(a) and (b)]

- a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shut down, but the permittee must inspect each burner at least once every 36 months). [§63.11223(b)(1)]
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(2)]
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. [§63.11223(b)(3)]
 - d. Optimize total emissions of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(4)]
 - e. Measure the concentrations in the effluent stream of CO in parts per million (ppm), by volume (v), and oxygen (O) in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). [§63.11223(b)(5)]
 - f. Maintain onsite and submit, if requested by the Department, biennial report containing the information in §63.11223(b)(6)(i) through (iii) as follows:
 - i. The concentrations of CO in the effluent stream in ppm, by v, and O in v percent, measured before and after the tune-up of the boiler.
 - ii. A description of any corrective actions taken as a part of the tune-up of the boiler (SN-06).
 - iii. The type and amount of fuel used over the 12 months prior to the biennial tune-up of the Boiler (SN-06).
 - g. If the Boiler (SN-06) is not operating on the required date for a tune-up, the tune-up must be conducted within one-week of start-up. [§63.11223(b)(7)]
24. Applicable requirements include the recordkeeping provisions of §63.11225(a)(4)(i, ii and iv); (b)(1) through (4); (c)(1), (2), (4) and (5); and (d), as follows:
- a. The permittee must submit the Notification of Compliance Status in accordance with §63.9(h) no later than 120 days after the applicable compliance dates specified in §63.11196, Specific Conditions #22.a. and b. In addition the Notification must include the following certification(s) of compliance, as applicable, and signed by a Responsible Official: [§63.11225(a)(4)]
 - i. "This facility complies with the requirements in §63.11214(b) to conduct an initial tune-up of the boiler (SN-06)." [§63.11225(a)(4)(i)]
 - ii. "This facility has had an energy assessment performed according to §63.11214(c)." [§63.11225(a)(4)(ii)]
 - iii. "No secondary materials that are solid waste were combusted in any affected unit." [§63.11225(a)(4)(iv)]

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

- b. The permittee must prepare, by March 1 of each year, and submit to the Department by March 15 each year, an annual compliance certification report for the previous calendar year containing the information specified in §63.11225(b)(1) through (3):
 - i. Company name and address.
 - ii. Statement by a Responsible Official, with the official's name, title, phone number, e-mail address, and original signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63 Subpart JJJJJ.
 - iii. If Boiler SN-06 experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- c. The permittee must maintain the following records specified in §63.11225(c)(1), (2), (4) and (5):
 - i. As required in §63.10(b)(2)(xiv), keep a copy of each notification and report submitted to comply with 40 CFR 63 Subpart JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status submitted. [§63.11225(c)(1)]
 - ii. Keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 as specified in §63.11225(c)(2)(i) and (ii), as follows:
 - 1) Records must identify the boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
 - 2) Records documenting the fuel type(s) used monthly by the Boiler (SN-06), including but not limited to, a description of the fuel, including whether the fuel has received a non-waste determination by the permittee or EPA, and the total fuel usage amount with units of measure.
 - iii. Records of the occurrence and duration of each malfunction of the boiler (SN-06), or of the associated air pollution control and monitoring equipment.
 - iv. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler (SN-06), air pollution control, or monitoring equipment to its normal or usual manner of operation.
- d. The records must be kept in a well-organized format, maintained on site and made available to Department personnel upon request. These records shall be kept on site for five years following the date of such records. [§63.11225(d)]

Pet Solutions, LLC
 Permit #: 2058-AR-7
 AFIN: 75-00051

Meal Handling and Load-out – SN-04, 07, 13 and 15

25. The permittee shall not exceed a throughput of 63,948 tons of meal production at SN-04 and SN-07 per rolling 12 month period. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
26. The permittee shall not exceed a throughput of 70,080 tons of meal production at SN-13 and SN-15 per rolling 12 month period. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
27. The permittee shall maintain monthly records to demonstrate compliance with Specific Conditions #25 and #26. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month’s data shall be maintained on-site and be made available to Department personnel upon request. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
28. The permittee shall process only poultry by-products at the facility, except as stated in this condition. The permittee may also process whole hogs, which must be processed immediately upon arrival unless the whole hogs are stored under refrigeration. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
29. All raw materials received at the facility shall be placed inside a process building immediately or shall not be stored outside for a period longer than 18 hours, unless this material is stored under refrigeration. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Scrubbers - SN-03, 08, 12A and 12B

30. The SN-03, 08, 12A and 12B scrubbers shall be kept in good working condition, shall operate continuously whenever their respective areas and/or lines are operating and shall be monitored to meet the following operating limits: [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN	Control Equipment and Air Flow	Parameter	Operating Limits Per Manufacturer’s Specification and Design
03	Wet Scrubber #1 with 100,000 CFM fan	ORP	Minimum 200 mV
08	Wet Scrubber #2 with 25,000 CFM fan	ORP	Minimum 200 mV

Pet Solutions, LLC
 Permit #: 2058-AR-7
 AFIN: 75-00051

SN	Control Equipment and Air Flow	Parameter	Operating Limits Per Manufacturer's Specification and Design
12A & 12B	Two Haarslev Scrubbers with 100,000 CFM fans	ORP	Minimum 200 mV
		Inlet Gas Temperature	Maximum 100°F
		pH Scrubbing Liquid	Range 8 to 9

- a. The permittee shall install, maintain and operate an Oxidation Reduction Potential (ORP) monitor or equivalent measuring device with data logger or other recording device to continuously measure and record the ORP of scrubbers SN-03, 08, 12A and 12B. The data logger or other recording device for existing scrubbers SN-03 and SN-08 shall be started up in conjunction with the startup of new scrubbers SN-12A and 12B. Each ORP monitor shall automatically alarm if the ORP falls below the minimum 200 millivolt (mV) level.
 - b. The permittee shall install, maintain and operate a temperature gauge with data logger or other recording device to continuously measure and record the inlet gas temperature to scrubbers SN-12A and 12B. Each temperature monitor shall automatically alarm if the temperature exceeds the maximum level of 100°F.
 - c. The permittee shall install, maintain, and operate a pH measurement device with data logger or other recording device to continuously measure and record the pH of the scrubbing solution in scrubbers SN-12A and 12B. Each pH measurement device shall automatically alarm if the pH set point range is violated.
 - d. The permittee shall monitor and record the ORP once every 8 hours for SN-03 and SN-08 during their operation until Specific Condition #30.a. is demonstrated complete.
31. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #30. The permittee shall maintain the Material Safety Data Sheets (MSDS) or equivalent documentation of the scrubber oxidizing agent. The requirement for continuous measurement and recording of the ORP of existing scrubbers SN-03 and SN-08 shall take effect when Specific Condition #30.a. is demonstrated complete. At that time Specific Condition #30.d. shall be discontinued as a requirement. The permittee shall record each failure/alarm on an as-occurred basis and shall include scrubber, date, time, shift, type of parameter failure/alarm, cause(s), method(s) of resolution and operator name/initial. The permittee shall maintain these records for two years. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. These records shall be maintained in a well-organized monthly format by source number, maintained on site and shall be made available to Department personnel upon request. [Regulation 19 §19.703 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

32. The permittee shall conduct a one-time initial performance test (IPT) of either scrubber SN-12A or SN-12B to demonstrate compliance with the VOC hourly emission limit specified in Specific Condition #1, in accordance with General Condition #7. Scrubbers SN-12A and 12B are identical and one test shall suffice for both. EPA Reference Method 25A shall be used to determine VOC emissions. Testing shall be performed in combined cycle mode at greater than or equal to 90% of the maximum operating load for lines directed to the scrubber tested. The performance test result shall be recorded, kept for the life of the units at the facility and submitted to the Department at the address in General Condition #6. [Regulation 19 §19.702 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
33. The permittee shall conduct a one-time IPT of scrubber SN-03 to demonstrate compliance with the VOC hourly emission limit specified in Specific Condition #1, in accordance with General Condition #7. EPA Reference Method 25A shall be used to determine VOC emissions. Testing shall be performed in combined cycle mode at greater than or equal to 90% of the maximum operating load for lines directed to scrubber SN-03. The performance test result shall be recorded, kept for the life of the unit at the facility and submitted to the Department at the address in General Condition #6. No IPT is required for scrubber SN-08. [Regulation 19 §19.702 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Negative Facility Air Pressure Monitoring

Specific Conditions #34 and #35 are temporarily suspended until after installation and startup of wet scrubbers SN-12A and 12B, but no later than July 15, 2012.

34. The permittee shall maintain a negative pressure inside all distinct areas of the process building at all times. All doors, windows and other openings shall be kept closed except for the following: [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. Process Building – Doors, windows and other openings may be kept open if SN-03, 08, 12A and 12B wet scrubbers are all operating properly and that all distinct areas of the process building are under negative pressure, as determined by outside air flowing into the structure and a once monthly pressure test per Specific Condition #35.
 - b. Raw Material Storage Building – All doors, windows and other openings shall be kept closed when not in use, except for the North entrance door to this building.
35. To demonstrate compliance with Specific Condition #34, the permittee shall test the Process Building interior air pressure once monthly. The test shall be performed in numerous areas, as appropriate to sufficiently cover the entire building. This test shall consist of a smoke test, anemometer or other test to demonstrate that the airflow is into the building at all openings except the scrubber discharges. If positive pressure is detected at any location, the permittee shall immediately take action to identify the cause

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

of the positive pressure, implement corrective action, and document that the building pressure complies with the permitted negative pressure following the corrective action. The permittee shall maintain these records for three years. These records shall be updated on an as-performed basis, maintained on site and made available to Department personnel upon request. [Regulation 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Property Boundary Odor Monitoring

Specific Conditions #36 and #37 are temporarily required until after installation and startup of wet scrubbers SN-12A and 12B, but no later than July 15, 2012.

36. The permittee shall perform daily odor check monitoring at the property fence line or at the edge of the developed portion of the property. Pet shall use a handheld Scentometer or Olfactometer monitor to assess odors at a facility for self-monitoring at the property line. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
37. To demonstrate compliance with Specific Condition #36, the permittee shall record all observations, including date, time, observer and whether or not detection of an odor was found. If an odor is detected, the permittee shall so state and shall estimate the intensity of the odor. If an intense or otherwise significant odorous smell is detected at any outside location, the permittee shall immediately take action to identify the cause, implement corrective action, and record the corrective action taken. The permittee shall maintain these records for one year. These records shall be updated on an as-performed basis, maintained on site and made available to Department personnel upon request. [Regulation 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

NESHAP Subpart CCCCCC Conditions – SN-16

38. The permittee shall not exceed a throughput of 15,000 gallons of gasoline (SN-16) per rolling 12-month period. The permittee shall not exceed a throughput of 10,000 gallons of gasoline per individual month. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
39. The permittee shall maintain documentation (e.g., purchase orders or receipts) and monthly records which demonstrate compliance with Specific Condition #36. Material Data Safety Sheets or other equivalent documents shall be maintained on-site and made available upon request. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site and made available to Department personnel upon request. Records shall be kept for a period of five years. [Regulation 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

40. The permittee is subject to and shall comply with the applicable provisions of 40 CFR Part 63, Subpart CCCCCC – *National Emission standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities* (Appendix C). *Gasoline dispensing facility (GDF)* is defined in §63.11132 as any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. Pet Solutions, an area source, is a GDF. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank. SN-16 is an existing affected source to which this subpart applies. Pet must comply with the standards in 40 CFR 63 Subpart CCCCCC no later than January 10, 2011. [Regulation 19 §19.304 and 40 CFR 63 Subpart CCCCCC]

41. The permittee must comply with the requirements in §63.11116 because it has a monthly throughput of less than 10,000 gallons of gasoline. Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline are as follows:
 - a. The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
 - i. Minimize gasoline spills;
 - ii. Clean up spills as expeditiously as practicable;
 - iii. Cover all open gasoline containers and all gasoline storage tanks fill-pipes with a gasketed seal when not in use; and
 - iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
 - b. The permittee is not required to submit notifications or reports as specified in §63.11125, §63.11126, or subpart A of Part 63, but the permittee must have records available within 24 hours of a request by the Department to document your gasoline throughput.
 - c. The permittee must comply with the requirements of 40 CFR 63 Subpart CCCCCC by the applicable dates specified in §63.11113.
 - d. Portable gasoline containers that meet the requirements of 40 CFR Part 59, subpart F, are considered acceptable for compliance with this.[Regulation 19 §19.304 and §63.11111(b) and §63.11116(a) through (d)]

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated June 30, 2011 and April 9, 2012.

Description	Category
One 1,200 gallon Diesel Storage Tank	A-3
One 640 gallon Diesel Storage Tank	A-3
Ash Bin/Conveyor System on the wood-fired boiler	A-13
Wood Chip/Sawdust Storage Piles	A-13

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
3. The permittee shall notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19 §19.704 and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19 §19.410(B) and/or Regulation 18 §18.309(B) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19 §19.705 and/or Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19 §19.705 and/or Regulation 18 §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

5301 Northshore Drive
North Little Rock, AR 72118-5317

7. The permittee shall test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) calendar days after the completion of testing. [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
8. The permittee shall provide: [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment
9. The permittee shall operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee shall maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19 §19.303 and/or Regulation 18 §18.1104 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19 §19.601 and/or Regulation 18 §18.1101 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and

nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
 - c. To inspect any monitoring equipment or monitoring method required in this permit;
 - d. To sample any emission of pollutants; and
 - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19 §19.410(A) and/or Regulation 18 §18.309(A) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19 §19.407(B) and/or Regulation 18 §18.307(B) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]
19. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
 - a. Such an extension does not violate a federal requirement;
 - b. The permittee demonstrates the need for the extension; and
 - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Regulation 18 §18.314(A), Regulation 19 §19.416(A), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

20. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facilities total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
 - a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;
 - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
 - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
 - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18 §18.314(B), Regulation 19 §19.416(B), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

Pet Solutions, LLC
Permit #: 2058-AR-7
AFIN: 75-00051

21. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
 - a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18 §18.314(C), Regulation 19 §19.416(C), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

CERTIFICATE OF SERVICE

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to Pet Solutions, LLC, 10511 Gauge Road, Danville, AR, 72833, on this 19th day of July 2012.

Pam Owen

Pam Owen, AAIL, Air Division