

STATEMENT OF BASIS

For the issuance of Air Permit # 2198-AR-2 AFIN: 62-00118

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Federal Bureau of Prisons - Federal Correctional Complex
1301 Dale Bumpers Road
Forrest City, Arkansas 72335

3. PERMIT WRITER:

Alexander Sudibjo

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Correctional Institutions
NAICS Code: 922140

5. SUBMITTALS:

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
11/3/2015	Modification	Increase throughput of gasoline tank

6. REVIEWER'S NOTES:

With this modification, the facility is increasing the annual throughput limit for the 12,000 gallon gasoline tank (SN-030) from 24,000 gallon to 84,000 gallon per rolling 12 month period. The permitted annual emission rate is increasing by 0.3 tpy VOC and 0.17 tpy total HAPs.

7. COMPLIANCE STATUS:

As of November 3, 2015, there are no compliance issues with the 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 is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
001-003	PM	NSPS Dc
030	HAP	NESHAP CCCCCC

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)		Control Equipment	Control Equipment Efficiency	Comments
001-003	AP-42 1.4 & 1.3	NG	lb/MMBTU	None	N/A	14 MM Btu/hr Boilers permitted at 8760 hrs/yr natural gas + 30 days/year maximum on diesel fuel
		PM	0.00746			
		PM ₁₀	0.00746			
		SO ₂	0.00059			
		VOC	0.00540			
		CO	0.08236			
		NO _x	0.09804			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments																					
		<table border="1"> <tr> <td>Diesel</td> <td>lb/MMBTU</td> </tr> <tr> <td>PM</td> <td>0.01429</td> </tr> <tr> <td>PM₁₀</td> <td>0.01429</td> </tr> <tr> <td>SO₂</td> <td>0.50715</td> </tr> <tr> <td>VOC</td> <td>0.00929</td> </tr> <tr> <td>CO</td> <td>0.03572</td> </tr> <tr> <td>NO_x</td> <td>0.14286</td> </tr> </table>	Diesel	lb/MMBTU	PM	0.01429	PM ₁₀	0.01429	SO ₂	0.50715	VOC	0.00929	CO	0.03572	NO _x	0.14286										
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029	MSDS	Maximum 1.0% by weight VOC	None	N/A	Unicor Gluing Operation																					
030	TANKS & MSDS	12,000 gallon Gas tank Horizontal, 34'x8' 7 turnovers a year VOC emissions=2,275.01 lb/yr 20% Toluene 20% Xylene 15% Ethyl benzene 11% MTBE 5% Benzene	None	N/A																						

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

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)
026	Hours of operation	Non-resettable hour meter	monthly	No
027				
028				

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)
001-003	natural gas and diesel fuel consumed	73,080 gal/12m for each boiler Boilers permitted @ capacity on NG	monthly	N
001-003 026-028	fuel oil sulfur content	0.5% maximum	each delivery	N
026-028	Hours of operation	500 total hours/12m per generator	Monthly	N
029	Adhesive usage	185,860 lb/12m max	Monthly	N
	VOC content (wt.%) of adhesives used	1.0 % by weight max	Each MSDS	N
030	Gasoline tank thrupt	9,999 gallons/month max	Each delivery	N
		84,000 gallons/12m max	Monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
001-003	5%, natural gas	§18.501	Inspector Observation
	20%, #2 fuel oil	§19.503	Inspector Observation
004-025	5%	§18.501	Natural gas only
026-028	20%	§19.503	Inspector Observation

17. DELETED CONDITIONS:

Former SC	Justification for removal
	None

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
<i>No additions to the insignificant activities list were made with this permit; therefore, this information was not provided or required.</i>								

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2198-AR-1

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

