

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2215-A AFIN: 18-00881

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Consolidated Grain and Barge  
896 S. Walker Avenue  
West Memphis, Arkansas 72301

3. PERMIT WRITER:

Franck Houenou

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Grain and Field Bean Merchant Wholesalers  
NAICS Code: 424510

5. ALL 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
1/17/2017	New	Operation of a barge loading facility

6. REVIEWER'S NOTES:

Consolidated Grain & Barge Co. (CGB) operates a barge loading facility located in West Memphis, Arkansas, at 896 S. Walker Ave. The facility unloads grain from trucks from surrounding area and transfers products to barges and occasionally to trucks. The facility currently operates under a Registration (No. 2215-A-REG315), however due to emissions varying from year to year and in an effort to obtain operational flexibility, the facility has submitted an application for a minor source permit. The annual permitted emission rates are 39.2 tpy PM, 10.4 tpy PM<sub>10</sub>, 0.1 tpy SO<sub>2</sub>, 0.1 tpy VOC, 0.7 tpy CO and 1.2 tpy NO<sub>x</sub>.

7. COMPLIANCE STATUS:

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

None

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  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  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)
None		

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:

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 N

If exempt, explain: No H<sub>2</sub>S Emission

## 12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	AP-42-9.9.1-1	PM: 0.025 lb/ton PM <sub>10</sub> : 0.0063 lb/ton	None	N/A	TPY based on annual throughput
02	AP-42-9.9.1-1	PM: 0.025 lb/ton PM <sub>10</sub> : 0.0063 lb/ton	None	N/A	
03	AP-42-9.9.1-1	PM: 0.025 lb/ton PM <sub>10</sub> : 0.0063 lb/ton	None	N/A	
04	AP-42-9.9.1-1	PM: 0.025 lb/ton PM <sub>10</sub> : 0.0063 lb/ton	None	N/A	
05	AP-42-9.9.1-1 & 1.5-1	Grain Elevators: PM: 0.22 lb/ton PM <sub>10</sub> : 0.055 lb/ton Fuel Combustion: PM/ PM <sub>10</sub> : 0.0007 lb/ton SO <sub>2</sub> : 0.000018 lb/ton NO <sub>x</sub> : 0.013 lb/ton VOC: 0.001 lb/ton CO: 0.0075 lb/ton	None	N/A	TPY based on propane usage of 180,000 gallons of propane
06	AP-42-9.9.1-1 & 1.5-1	Grain Elevators: PM: 0.22 lb/ton PM <sub>10</sub> : 0.055 lb/ton Fuel Combustion: PM/ PM <sub>10</sub> : 0.0007 lb/ton SO <sub>2</sub> : 0.000018 lb/ton NO <sub>x</sub> : 0.013 lb/ton VOC: 0.001 lb/ton CO: 0.0075 lb/ton	None	N/A	
07	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With a 90% collection efficiency	Filter System	98%	TPY based on annual throughput

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments	
08	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With a 90% collection efficiency	Filter System	98%	TPY based on annual throughput	
09	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With a 90% collection efficiency	Filter System	98%		
10	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With a 90% collection efficiency	Filter System	98%		
07	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With 10% fugitive emissions	None	None		
08a	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With 10% fugitive emissions	None	None		
09a	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With 10% fugitive emissions	None	None		
10a	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With 10% fugitive emissions	None	None		
11	AP-42-9.9.1-1	PM: 0.061 lb/ton PM <sub>10</sub> : 0.034 lb/ton	Fully enclosed	99%		Annual Throughput: 42,000,000 bushels
12	AP-42-9.9.1-1	PM: 0.016 lb/ton PM <sub>10</sub> : 0.004 lb/ton	Telescopic Spout	50%		Annual Throughput: 41,000,000 bushels

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
13	AP-42-9.9.1-1	PM: 0.086 lb/ton PM <sub>10</sub> : 0.029 lb/ton	Loadout Socks	50%	Annual Throughput: 1,000,000

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)
None				

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)
05 & 06	Annual propane usage	180,000 gal (both sources combined)	Monthly	N
07, 08, 09 & 10	Annual throughput if grain	42,000,000 bushels	Monthly	N
13	Annual throughput	1,000,000 bushels	Monthly	N

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
05 and 06	20%	Reg.19.503	Observation
01-04 and 11-13	20%	Reg.18.501	Observation
07, 08, 09,10	Dust Filter System: 10%	Reg.18.501	Observation
	Fugitives: 20%	Reg.19.503	Observation

17. DELETED CONDITIONS:

Former SC	Justification for removal
None	

18. GROUP A INSIGNIFICANT ACTIVITIES:

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
None								

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
2215-A-REG315

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION