



ARKANSAS  
Department of Environmental Quality

JUN 16 2017

Kurt Hasty  
Regional Operations Manager  
Consolidated Grain and Barge Co.  
896 S. Walker Avenue  
West Memphis, AR 72301

Dear Mr. Hasty:

The enclosed Permit No. 2215-A is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 1/17/2017.

After considering the facts and requirements of A.C.A. §8-4-101 et seq. as referenced by §8-4-304, and implementing regulations, I have determined that Permit No. 2215-A for the construction and operation of equipment at Consolidated Grain and Barge Co. shall 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,

A handwritten signature in black ink, appearing to read "Stuart Spencer", is written over a horizontal line.

Stuart Spencer  
Associate Director, Office of Air Quality

Enclosure: Final Permit

## **RESPONSE TO COMMENTS**

### **CONSOLIDATED GRAIN AND BARGE CO.**

**PERMIT #2215-A**

**AFIN: 18-00881**

On April 18 and April 21, 2017, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, written comments on the draft permitting decision were submitted. 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:**

The four dust filter system emission points for the dump pits, SN-07, 08, 09, & 10, should be identified in Specific Conditions 1, 2 and 3, e.g. SN-07A Dump Pit (fugitives) and SN-07B Dump Pit (Dust Filter System), and be assigned an appropriate opacity limit.

#### **Response to Comment #1:**

The final permit added sources for the PM/PM<sub>10</sub> fugitive emissions (SN-07a, SN-08a, SN-09a and SN-10a) from the receiving pits. The final permit based the PM/PM<sub>10</sub> emissions on a collection efficiency of 90% of the total emissions going to the filter system. The final permit added an opacity limit of 20% to the sources.

# ADEQ MINOR SOURCE AIR PERMIT

Permit No. : 2215-A

IS ISSUED TO:

Consolidated Grain and Barge Co.  
896 S. Walker Avenue  
West Memphis, AR 72301  
Crittenden County  
AFIN: 18-00881

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. § 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



Stuart Spencer  
Associate Director, Office of Air Quality

JUN 16 2017

Date

Consolidated Grain and Barge Co.

Permit #: 2215-A

AFIN: 18-00881

## Table of Contents

Section I: FACILITY INFORMATION.....	4
Section II: INTRODUCTION.....	5
Summary of Permit Activity.....	5
Process Description.....	5
Regulations .....	6
Total Allowable Emissions .....	6
Section III: PERMIT HISTORY .....	7
Section IV: EMISSION UNIT INFORMATION.....	8
Section V: INSIGNIFICANT ACTIVITIES .....	12
Section VI: GENERAL CONDITIONS .....	13

Consolidated Grain and Barge Co.

Permit #: 2215-A

AFIN: 18-00881

#### List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Smaller Than Ten Microns
SO <sub>2</sub>	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Consolidated Grain and Barge Co.

Permit #: 2215-A

AFIN: 18-00881

## Section I: FACILITY INFORMATION

PERMITTEE: Consolidated Grain and Barge

AFIN: 18-00881

PERMIT NUMBER: 2215-A

FACILITY ADDRESS: 896 S. Walker Avenue  
West Memphis, AR 72301

MAILING ADDRESS: 896 S. Walker Avenue  
West Memphis, AR 72301

COUNTY: Crittenden County

CONTACT NAME: Kurt Hasty

CONTACT POSITION: Regional Operations Manager

TELEPHONE NUMBER: (618) 748-9567

REVIEWING ENGINEER: Franck Houenou

UTM North South (Y): Zone 15: 3891838.87 m

UTM East West (X): Zone 15: 759705.54 m

Consolidated Grain and Barge Co.  
Permit #: 2215-A  
AFIN: 18-00881

## Section II: INTRODUCTION

### Summary of Permit Activity

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>.

### Process Description

Consolidated Grain & Barge Co. (CGB) currently operates a barge loading facility on the Mississippi River in West Memphis. This facility unloads grain from trucks from the surrounding area and transfers product to barges and occasionally to trucks. The emission points are at the truck receiving pits where the grain is unloaded from the truck trailers and enters the pits, bin vents, grain dryers, truck and barge spouts.

From the pits, the grain is either elevated into a grain bin, transferred to a truck loadout or transferred directly onto the river belt, which discharges the grain through a barge loading spout into the barge. The river conveyor is covered and enclosed. Each truck pit is equipped with a dust collection system at the facility to control dust on the four truck receiving pits and pit conveyors.

The facility also has seven (7) other dust control equipments on their enclosed handling conveyors. They are fully enclosed separators in which suspended dust is collected in a fully enclosed filter at that specific point and then it is a purge system in which the suspended dust that is collected in the filters is put back into the fully enclosed handling conveyor. These units are not in use at the facility currently, however, in the event they ever would be put in use, they are part of the fully enclosed internal handling system. No new emission points need to be added to the permit, there will be no additional emission points.

Consolidated Grain and Barge Co.  
Permit #: 2215-A  
AFIN: 18-00881

### Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective March 14, 2016
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective March 14, 2016

### 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	48.4	52.4
PM <sub>10</sub>	11.1	14.8
SO <sub>2</sub>	0.2	0.1
VOC	0.2	0.1
CO	0.6	0.7
NO <sub>x</sub>	1.0	1.2
PM <sub>2.5</sub>	See Note*	

\*PM<sub>2.5</sub> limits are source specific, if required. Not all sources have PM<sub>2.5</sub> limits.



Consolidated Grain and Barge Co.

Permit #: 2215-A

AFIN: 18-00881

### Section III: PERMIT HISTORY

The facility has been operating under a Registration (No. 2215-A-REG315). This is the initial minor source air permit for the facility.

## Section IV: EMISSION UNIT INFORMATION

## Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table.  
 [Reg.19.501 *et seq.* and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Storage Bin #1	PM <sub>10</sub>	1.6	2.8
02	Storage Bin #2	PM <sub>10</sub>	0.3	
03	Storage Bin #3	PM <sub>10</sub>	0.3	
04	Storage Bin #4	PM <sub>10</sub>	0.3	
05	Grain Dryer #1	PM <sub>10</sub>	2.0	4.7 0.1 0.1 0.7 1.2
		SO <sub>2</sub>	0.1	
		VOC	0.1	
		CO	0.3	
		NO <sub>x</sub>	0.5	
06	Grain Dryer #2	PM <sub>10</sub>	2.0	
		SO <sub>2</sub>	0.1	
		VOC	0.1	
		CO	0.3	
		NO <sub>x</sub>	0.5	
07	Dump Pit #1 Controlled	PM <sub>10</sub>	0.2	0.9
08	Dump Pit #2 Controlled	PM <sub>10</sub>	0.2	
09	Dump Pit #3 Controlled	PM <sub>10</sub>	0.2	
10	Dump Pit #4 Controlled	PM <sub>10</sub>	0.2	
07a	Dump Pit #1 Fugitive	PM <sub>10</sub>	1.0	4.4
08a	Dump Pit #2 Fugitive	PM <sub>10</sub>	1.0	
09a	Dump Pit #3 Fugitive	PM <sub>10</sub>	1.0	
10	Dump Pit #4 Fugitive	PM <sub>10</sub>	1.0	
11	Internal Transfer (Conveyor)	PM <sub>10</sub>	0.3	0.3
12	Barge Loadout	PM <sub>10</sub>	1.3	1.5
13	Truck Loadout	PM <sub>10</sub>	0.2	0.2

Consolidated Grain and Barge Co.

Permit #: 2215-A

AFIN: 18-00881

2. The permittee shall not exceed the emission rates set forth in the following table.  
[Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Storage Bin #1	PM	6.3	11.1
02	Storage Bin #2	PM	1.1	
03	Storage Bin #3	PM	1.1	
04	Storage Bin #4	PM	1.1	
05	Grain Dryer #1	PM	7.9	18.5
06	Grain Dryer #2	PM	7.9	
07	Dump Pit #1 Controlled	PM	0.6	2.7
08	Dump Pit #2 Controlled	PM	0.6	
09	Dump Pit #3 Controlled	PM	0.6	
10	Dump Pit #4 Controlled	PM	0.6	
07a	Dump Pit #1 Fugitive	PM	2.8	13.2
08a	Dump Pit #2 Fugitive	PM	2.8	
09a	Dump Pit #3 Fugitive	PM	2.8	
10	Dump Pit #4 Fugitive	PM	2.8	
11	Internal Transfer (Conveyor)	PM	0.4	0.5
12	Barge Loadout	PM	5.0	5.8
13	Truck Loadout	PM	0.5	0.6

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

SN	Limit	Regulatory Citation
05 and 06	20%	Reg.19.503
01-04 and 11-13	20%	Reg.18.501
07, 08,	Dust	Reg.18.501

Consolidated Grain and Barge Co.

Permit #: 2215-A

AFIN: 18-00881

SN	Limit	Regulatory Citation
09,10	Filter System: 10%	
07a, 08a, 09a,10a	Dump Fugitives: 20%	Reg.19.503

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 Ark. Code Ann. § 8-4-303. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.18.901 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. The permittee shall not exceed a receipt of 42,000,000 bushels of grain at the facility per rolling 12-month period. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
7. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #6. 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. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall not use more than 180,000 gallons of propane at both SN- 05 and SN- 06 combined per rolling 12-month period. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
9. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #8. 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. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
10. The permittee shall not exceed a throughput of 41,000,000 bushels of grain at SN- 12 (Barge Loadout) per rolling 12-month period. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Consolidated Grain and Barge Co.

Permit #: 2215-A

AFIN: 18-00881

11. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #10. 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. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
12. The permittee shall not exceed a throughput of 1,000,000 bushels of grain at SN- 13 (Truck Loadout) per rolling 12 month period. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
13. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #10. 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. [Reg.19.705 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Consolidated Grain and Barge Co.

Permit #: 2215-A

AFIN: 18-00881

#### 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 Regulation 19 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated February 24, 2017. [Reg.19.408 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
None	

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 (Ark. Code Ann. § 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 (Ark. Code Ann. § 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 (Ark. Code Ann. § 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. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.704 and/or Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Reg.19.410(B) and/or Reg.18.309(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.705 and/or Reg.18.1004 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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

Consolidated Grain and Barge Co.

Permit #: 2215-A

AFIN: 18-00881

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 sixty (60) calendar days after the completion of testing. [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
8. The permittee shall provide: [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.303 and/or Reg.18.1104 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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: [Reg.19.601 and/or Reg.18.1101 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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: [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.410(A) and/or Reg.18.309(A) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 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. [Reg.19.407(B) and/or Reg.18.307(B) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Consolidated Grain and Barge Co.

Permit #: 2215-A

AFIN: 18-00881

15. This permit shall be available for inspection on the premises where the control apparatus is located. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
  16. This permit authorizes only those pollutant emitting activities addressed herein. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
  17. This permit supersedes and voids all previously issued air permits for this facility. [Reg. 18 and/or Reg. 19 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
  18. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [Ark. Code Ann. § 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.
- [Reg.18.314(A) and/or Reg.19.416(A), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 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.

Consolidated Grain and Barge Co.

Permit #: 2215-A

AFIN: 18-00881

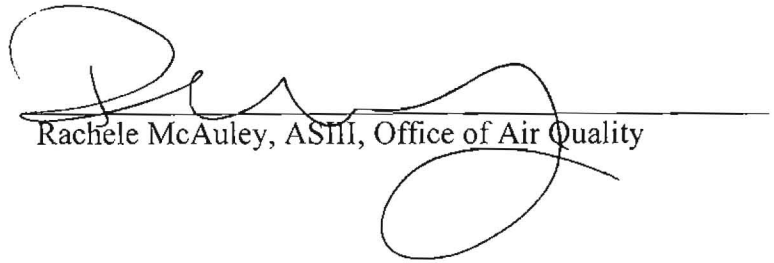
[Reg.18.314(B) and/or Reg.19.416(B), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

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.

[Reg.18.314(C) and/or Reg.19.416(C), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

**CERTIFICATE OF SERVICE**

I, Rachele McAuley, hereby certify that a copy of this permit has been mailed by first class mail to Consolidated Grain and Barge Co., 896 S. Walker Avenue, West Memphis, AR, 72301, on this 16<sup>th</sup> day of June, 2017.

  
Rachele McAuley, ASIII, Office of Air Quality