

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0277-AR-7 AFIN: 54-00009

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Helena Industries, LLC
101 W Martin Luther King JR Drive #49
Helena-West Helena, Arkansas 72390

3. PERMIT WRITER:

Shawn Hutchings

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Farm Supplies Merchant Wholesalers
NAICS Code: 424910

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

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
12/17/2024	Deminimis	New Tank, SN-63

6. REVIEWER'S NOTES:

Helena Industries, Inc. (AFIN: 54-00009) is a toll manufacturing facility that formulates and packages agricultural chemicals. The facility receives bulk intermediate or final agricultural chemicals and either packages or custom blends the chemicals to customer specifications. The facility is located at 101 MLK Jr. Drive (Hwy. 49), West Helena, Arkansas. This permit was a de minimis change to install a new 25,000 gallon process tank, SN-63. In addition to many process flow and formulation changes in Liquid Area III (LA3). Permitted HAP emissions decreased 2.25 tpy. All other pollutants were unchanged.

There was also a category B mobile engine insignificant activity which was not needed and removed.

7. COMPLIANCE STATUS:

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

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? 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 for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
None		

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
None				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N/A

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any 8 CAR pt. 40 requirement.)

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
N/A		

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

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

c) H₂S 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 H₂S Standards Y

If exempt, explain: H₂S emissions not permitted

15. CALCULATIONS:

Pollutants	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
PM and PM10	PM10-1985 NAPAP Emissions Inventory: PM Removal Efficiencies	-	Filter; Dust Collector	99.9%	
VOC and HAP	AP-42, Section 5.2 AP-42, Chapter 7, Equation 1-4	Varies			
Boiler	AP-42 Chapter 1.4-1 and 1.4-2	84 lb CO/106scf; 7.6 lb PM/PM10/106scf;			

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
None				

17. 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				

18. 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)
Liquid Area 3	VOC Containing Liquid (Gallons/Year)	3,550,000	Monthly	N
Liquid Area 1		9,330,000	Monthly	N
Liquid Area 5		1,718,496	Monthly	N
Liquid Area 1		9,330,000	Monthly	N
Tank Farm 2		11,950,000	Monthly	N
Tank Farm 1		11,000,000	Monthly	N
Mill 3	Dry Material (Tons/Year)	26,280	Monthly	N
Mill 5		10,000	Monthly	N
Liquid Area 1		4,794	Monthly	N
Dry Pack Area		5,000	Monthly	N
Facility	HAP Containing Liquid Ingredient Mixed and Loaded Out (Gallons/Year)	15,490,227	Monthly	N
Facility	HAP Containing Solid Ingredient Mixed and Loaded Out	4,806	Monthly	N
Facility	Total HAP	5.75 tpy	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
Facility	10%	Department Guidance	Inspector Observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
none	

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21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
None								

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0277-AR-6

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Revised 03-11-16

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		Old Permit	New Permit
\$/ton factor	28.14	8	7.5
Minimum Fee \$	400	-0.5	
Minimum Initial Fee \$	500		
		Permit Fee \$	400
Check if Administrative Amendment	☐	Annual Chargeable Emissions (tpy)	7.5 No Annual Fee

[illegible]