

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1417-AR-5 AFIN: 24-00022

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Butterball, LLC  
307 Dodgen Place  
Ozark, Arkansas 72949

3. PERMIT WRITER:

John Mazurkiewicz

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Poultry Processing  
NAICS Code: 311615

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
3/4/2021	Modification	HAP emission limits have been added for the existing boilers (SN-01 and SN-03).  An 18 MMBtu/hr Kemco Boiler (SN-04) has been added.

6. REVIEWER'S NOTES:

- In addition to changes listed in the permit, various corrections and formatting changes were made throughout the permit.

## 7. COMPLIANCE STATUS:

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

There are no active or pending enforcement actions against the facility. The last inspection was conducted on December 5, 2017. No areas of concern were noted. A review of ECHO revealed no CAA violations in the last 12 quarters.

## 8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? No.  
If yes, were GHG emission increases significant? N/A.

b) Is the facility categorized as a major source for PSD? No.

- *Single pollutant  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD. N/A.

## 9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-01, SN-03, and SN-04	SO <sub>2</sub>	NSPS Subpart Dc

## 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:

N/A.

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

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:

The non-criteria pollutants listed below were evaluated. Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value ( $\text{mg}/\text{m}^3$ ), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV ( $\text{mg}/\text{m}^3$ )	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
Acenaphthene	0.2	0.022	8.36E-08	Yes
Benzo(a)anthracene	0.2	0.022	8.36E-08	Yes
Benzo(a)pyrene	0.2	0.022	5.58E-08	Yes
Benzo(b)fluoranthene	0.2	0.022	8.36E-08	Yes
Benzo(g,h,i)perylene	0.2	0.022	5.58E-08	Yes
Benzo(k)fluoroanthene	0.2	0.022	8.36E-08	Yes
Dibenzo(a,h)anthracene	0.2	0.022	5.58E-08	Yes
7,12-Dimethylbenz(a)anthracene	0.2	0.0022	7.43E-07	Yes
Fluoranthene	0.2	0.022	1.39E-07	Yes
Fluorene	0.2	0.022	1.30E-07	Yes
Indeno(1,2,3,c,d)pyrene	0.2	0.022	8.36E-08	Yes

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
3-Methylcholanthrene	0.2	0.022	8.36E-08	Yes
Arsenic	0.01	0.0011	9.29E-06	Yes
Beryllium	0.00005	5.5E-06	5.58E-07	Yes
Cadmium	0.01	0.0011	5.11E-05	Yes
Chromium	0.5	0.055	6.50E-05	Yes
Cobalt	0.02	0.0022	3.90E-06	Yes
Lead	0.05	0.0055	2.32E-05	Yes
Manganese	0.1	0.011	1.77E-05	Yes
Mercury	0.025	0.00275	1.21E-05	Yes
Selenium	0.2	0.022	1.12E-06	Yes

## 15. 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	Table 1.4-1, 2 (lb/10 <sup>6</sup> scf)	none	none	Uncontrolled
02	mass balance	lb/hr ton/yr	none	none	Uncontrolled
	Tank 3.0 Program	lb/hr ton/yr	none	none	Uncontrolled
03	AP-42	Table 1.4-1, 2 (lb/10 <sup>6</sup> scf)	none	none	Uncontrolled
04	AP-42 Table 1.4-1 through 4	7.6 lb PM <sub>10</sub> /MMscf 0.6 lb SO <sub>2</sub> /MMscf 5.5 lb VOC/MMscf 84.0 lb CO/MMscf 100 lb NO <sub>x</sub> /MMscf	none	none	8,760 hr/yr 1,020 Btu/scf

## 16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

## 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)
N/A				

## 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)
02	ClO <sub>2</sub> Solution Usage ClO <sub>2</sub> Concentration	50 gallons/minute 50 ppm	Monthly	N
01, 03, 04	Natural Gas Usage	Equip. Capacity	Daily	N

## 19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 03, 04	5%	Department Guidance	Upon Inspection
02	20%	Department Guidance	Upon Inspection

## 20. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

## 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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
1.0 MMBtu/hr Natural Gas Fired Dehumidifier	A-1	0.04	0.01	0.03	0.37	0.43	0.01	0.01
250 Gallon Storage Tank	A-2							
300 Gallon Diesel Fuel Storage Tank	A-3			<0.01				<0.01

## 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 #
1417-AR-4

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

Butterball, LLC

Permit Number: 1714-AR-4

AFIN: 24-00022

			<b>Old Permit</b>	<b>New Permit</b>
\$/ton factor	23.93	Permit Predominant Air Contaminant	14.4	22.2
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	7.8	
Minimum Initial Fee \$	500			
		Permit Fee \$	400	
Check if Administrative Amendment	<input type="checkbox"/>	Annual Chargeable Emissions (tpy)	22.2	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	1.1	1.7	0.6
PM <sub>10</sub>	1.1	1.7	0.6
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	0.2	0.3	0.1
VOC	0.8	1.3	0.5
CO	11.9	18.4	6.5
NO <sub>x</sub>	14.4	22.2	7.8
ClO <sub>2</sub>	0.6	0.6	0
Total HAPs	0	0.39	0.39