

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1582-AR-12 AFIN: 58-00263

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

ConAgra Foods Packaged Foods, LLC  
3100 East Main Street  
Russellville, Arkansas 72801

3. PERMIT WRITER:

Jesse Smith

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Frozen Specialty Food Manufacturing  
NAICS Code: 311412

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
7/2/2019	Deminimis Mod	New flour storage silo, two mixers, and a 175 kW emergency generator

6. REVIEWER'S NOTES:

ConAgra Foods owns and operates a frozen food manufacturing and packaging facility located at 3100 East Main Street in Russellville, AR 72801. This permitting action is to add a 3,000 cubic feet silo for flour storage, including a vacuum-based delivery system (SN-48 and SN-49), two mixers (SN-50 and SN-51), a certified 175 kW emergency generator (SN-52) and six natural gas fired combustion units to the insignificant activities list. Permitted emissions have changed as follows: increase of 6.1 tpy PM, increase of

2.2 tpy of PM<sub>10</sub>, increase of 0.1 tpy SO<sub>2</sub>, increase of 0.1 tpy VOC, increase of 0.2 tpy CO, and an increase of 0.1 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.

The facility was last inspected on March 31, 2017. There were no concerns noted during this inspection.

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)
SN-37, SN-41, SN-42, SN-43, SN-44 and SN-45	NO <sub>x</sub> & CO	40 C.F.R. § 60 Subpart Dc
SN-47	HAPs	40 C.F.R. § 63 Subpart ZZZZ

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

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

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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 ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

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

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

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
36	mass balance	purchase of 120,000 lbs/yr ammonia	none	N	These are non-point source losses from things like valves, leaks, etc in the refrigeration system.
37, 40, 41, 42, 43, 44, and 45	AP-42 for Natural Gas Combustion  Manufacturer's guarantee	NO <sub>x</sub> : 2.46 lb/hr PM/PM <sub>10</sub> : 0.251 lb/hr SO <sub>2</sub> : 0.025 lb/hr VOC: 0.402 lb/hr CO: 3.77 lb/hr	none	N/A	They used the higher of the two numbers.
38	Missouri DNR factors	PM/PM <sub>10</sub> : 0.23 lb/ton processed	None	NA	Emission factor uncontrolled

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
39	South Coast AQMD factors	PM/PM <sub>10</sub> : 0.03 lb/1000 lb processed VOC: 0.402 lb/1000 lb processed	Scrubber	99	Emission factors uncontrolled
46	AP-42 Natural Gas Combustion Factors	<u>lb/MMBtu</u> PM/PM <sub>10</sub> = 7.6 SO <sub>x</sub> = 0.6 VOC = 5.5 CO = 84.0 NO <sub>x</sub> = 100	None	N/A	Uncontrolled
47	AP-42 Chapter 3.2 – Natural gas Engine (4 stroke Rich Burn)	<u>Lb/MMBtu</u> PM/PM <sub>10</sub> = 1.94E-02 SO <sub>x</sub> = 5.88E-04 VOC = 2.96E-02 CO = 3.72 NO <sub>x</sub> = 2.27	None	N/A	Uncontrolled
48	Design Volumetric Flow Rate	1200 scf/min 7000 grains/lb	Filter	0.005 grains/scf	
49		600 scf/min 7000 grains/lb			
50 51	AP-42 Table 11.12-2	0.572 PM lb/ton 0.156 PM <sub>10</sub> /PM <sub>2.5</sub> lb/ton			
52	AP-42 Table 3.2-2	<u>g/hp-hr</u> VOC – 1.0 NO <sub>x</sub> – 2.0 CO – 4.0			
	Table 1 to Subpart JJJJ	<u>Lb/MMBtu</u> PM <sub>10</sub> –			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		9.99E-03 SO <sub>2</sub> – 5.88 E-04			

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

15. 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)
37, 40, 41, 42, 43, 44, and 45	Natural Gas Usage	Meter allocation	Monthly	N

16. 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)
36	Ammonia usage	120,000 lbs	annual	N
39	Poultry Processing	52,000,000	consecutive 12 Months	N
47	Engine hours	500	Monthly	N
52	Engine Hours	100	Monthly	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
SN-36, SN-37, SN-38, SN-40,	5%	Department Standard	Natural Gas Fuel Used
SN-39	20%	Reg.19.503	Control Equipment

SN	Opacity	Justification for limit	Compliance Mechanism
SN-47	20%	Reg.19.503	Inspector Observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
	N/a

19. 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) 1.5 MMBTU/hr Tortilla Ovens	A-1	0.09	0.05	0.05	0.57	0.66	0.01	0.01
(1) 1.2 MMBtu/hr Rotary Brander #1	A-1	0.05	0.05	0.05	0.44	0.53	0.02	0.02
(1) 2.5 MMBtu/hr Hot Oil Heater	A-1	0.08	0.01	0.06	0.90	1.07	0.02	0.02
(1) 1.2 MMBtu/hr Charmarker	A-1	0.04	0.01	0.03	0.43	0.52	0.01	0.01
4RMAU-6 Cleanup Burner	A-1	0.10	0.01	0.07	1.09	1.30	0.02	0.02
4RMAU-6 O/A Heating Burner	A-1	0.01	0.01	0.01	0.07	0.08	0.01	0.01
4RMAU-7 Cleanup Burner	A-1	0.10	0.01	0.07	1.09	1.30	0.02	0.02
4RMAU-7 Regeneration Burner	A-1	0.05	0.01	0.04	0.60	0.71	0.01	0.01
4RMAU-8 Cleaning/Heating Burner	A-1	0.02	0.01	0.01	0.20	0.24	0.01	0.01
4RMAU-9 Cleanup/Heating Burner	A-1	0.02	0.01	0.02	0.23	0.28	0.01	0.01

PASTA Mixer #1	A-13	1.94	-	-	-	-	-	-
PASTA Mixer #2	A-13	1.94	-	-	-	-	-	-
Cleaning Operations (Acetic Acid and Peroxyacetic Acid)	A-13	-	-	4.50	-	-	-	-

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

Permit #
1582-AR-11





## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

ConAgra Foods Packaged Foods, LLC  
 Permit #: 1582-AR-12  
 AFIN: 58-00263

			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	79.2	79.3
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0.1	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	79.3	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	17	23.1	6.1
PM <sub>10</sub>	17	19.2	2.2
PM <sub>2.5</sub>	0	0	0
SO <sub>2</sub>	6.3	6.4	0.1
VOC	11.9	12	0.1
CO	87.9	88.1	0.2
NO <sub>x</sub>	79.2	79.3	0.1
Single HAP	2.01	2.02	0.01
Total HAP	2.21	2.22	0.01
Chromium, hex	0.001	0.001	0