

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1582-AR-13 AFIN: 58-00263

1. PERMITTING AUTHORITY:

Division 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:

Jimmy Do

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
1/30/2023	Modification	Change the operation of SN-47 to a non-emergency engine

6. REVIEWER'S NOTES:

This permit modification is to change SN-47 to a non-emergency generator. There is no change in permitted emissions.

7. COMPLIANCE STATUS:

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

The last inspection was conducted February 3, 2022. No areas of concern were identified. A review of ECHO revealed no additional CAA violations in the last twelve quarters.

A complaint was investigated on February 20, 2019 for a foul odor. There were no upset conditions that had occurred during the past few weeks, therefore, it was determined that there was no foundation for the foul odor due to the facility.

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 _x & CO	40 C.F.R. § 60 Subpart Dc
SN-47	CO & HAPs	40 C.F.R. § 63 Subpart ZZZZ
SN-52	VOC, NO _x , PM	40 C.F.R. § 60 Subpart JJJJ

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

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

If yes, are applicable requirements included and specifically identified in the permit? N

If not, explain why. N/A

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
None		

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 Department 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: No H₂S emission

15. 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	none	N	These are non-point source losses from

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		lbs/yr ammonia			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 _x : 2.46 lb/hr PM/PM ₁₀ : 0.251 lb/hr SO ₂ : 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 ₁₀ : 0.23 lb/ton processed	None	NA	Emission factor uncontrolled
39	South Coast AQMD factors	PM/PM ₁₀ : 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 ₁₀ = 7.6 SO _x = 0.6 VOC = 5.5 CO = 84.0 NO _x = 100	None	N/A	Uncontrolled
47	AP-42 Chapter 3.2 – Natural gas Engine (4 stroke Rich Burn)	<u>Lb/MMBtu</u> PM/PM ₁₀ = 1.94E-02 SO _x = 5.88E-04 VOC = 2.96E-02 CO = 3.72 NO _x = 2.27	None	N/A	Uncontrolled
48	Design Volumetric	1200 scf/min	Filter	0.005	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
49	Flow Rate	7000 grains/lb		grains/scf	
		600 scf/min 7000 grains/lb			
50 51	AP-42 Table 11.12-2	0.572 PM lb/ton 0.156 PM ₁₀ /PM _{2.5} lb/ton			
52	AP-42 Table 3.2-2	<u>g/hp-hr</u> VOC – 10 NO _x – 10 CO – 387			
	Table 1 to Subpart JJJJ	<u>Lb/MMBtu</u> PM ₁₀ – 9.99E-03 SO ₂ – 5.88 E-04			

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

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)
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

19. 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 Operation
SN-47	20%	Reg.19.503	Inspector Observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
	None

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
(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	-	-	-	-

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 #
1582-AR-12

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: ConAgra Foods
Packaged Foods, LLC
Permit Number: 1582-AR-13
AFIN: 58-00263

			Old Permit	New Permit
\$/ton factor	25.13	Permit Predominant Air Contaminant	79.4	79.4
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
		Permit Fee \$	400	
Check if Administrative Amendment	<input type="checkbox"/>	Annual Chargeable Emissions (tpy)	79.4	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	23.1	23.1	0
PM ₁₀	19.2	19.2	0
PM _{2.5}	0	0	0
SO ₂	6.4	6.4	0
VOC	12.1	12.1	0
CO	92.5	92.5	0
NO _x	79.4	79.4	0
Single HAP	2.02	2.02	0
Total HAP	2.22	2.22	0
Chromium, hex	0.001	0.001	0