

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1709-AR-7 AFIN: 62-00125

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Boar's Head Provisions Co., Inc.
2530 West Broadway
Forrest City, Arkansas 72335

3. PERMIT WRITER:

Jesse Smith

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Meat Processed from Carcasses
NAICS Code: 311612

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
2/7/2023	Administrative Amendment	N/A
3/3/2023	Modification	Replaced SN-06 emergency generator

6. REVIEWER'S NOTES:

Boar's Head Provisions Co., Inc. owns and operates a food manufacturing facility in Forrest City. The facility manufactures various types of deli meats (NAICS Code 311612). A 40 kW emergency engine has been replaced by a newer model 48 kW emergency engine. The Insignificant Activities has also been updated to include a steam oven utilizing wood chips as fuel. Annual permitted emissions did not change with this administrative amendment. Emissions of CO have decreased by 0.1 tpy and emissions of NO_x have increased by 0.1 tpy.

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 July 19, 2022. There were no areas of concern noted at this time.

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*

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
01 & 02	Recordkeeping	NSPS 40 CFR Part 60 Subpart Dc
04	PM/PM ₁₀ , VOC, CO	NESHAP 40 CFR Part 63 Subpart ZZZZ
06	PM/PM ₁₀ , VOC, CO	NSPS 40 CFR Part 60 Subpart JJJJ
07	N/A	NESHAP 40 CFR Part 63 Subpart CCCCCC

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
N/A				

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.)

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:

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

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Acrolein	0.2	0.022	0.016753	Y

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
None			

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 emissions

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01-02	AP-42 1.4 Nat. Gas	PM/PM ₁₀ 7.6 lb/MMscf SO ₂ 0.6 lb/MMscf VOC 5.5 lb/MMscf CO 84 lb/MMscf NO _x 100 lb/MMscf Lead 0.0005 lb/MMscf Total HAP 1.89 lb/MMscf			
01-02	AP-42 1.3 Fuel Oil	PM 2.0 lb/10 ³ gal PM ₁₀ 1.0 lb/10 ³ gal SO ₂ 71.0 lb/10 ³ gal VOC 0.252 lb/10 ³ gal CO 5.0 lb/10 ³ gal NO _x 20 lb/10 ³ gal Lead 0.0013 lb/10 ³ gal Total HAP 0.0466 lb/10 ³ gal			
03	AP-42 1.4 Nat. Gas	PM 7.6 lb/MMscf PM ₁₀ 7.6 lb/MMscf			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		SO ₂ 0.6 lb/MMscf VOC 5.5 lb/MMscf CO 84 lb/MMscf NO _x 50 lb/MMscf Lead 0.0005 lb/MMscf Total HAP 1.89 lb/MMscf			
04	AP-42 3.4	PM 0.0697 lb/MMBtu PM ₁₀ 0.0573 lb/MMBtu SO ₂ 0.505 lb/MMBtu VOC 0.09 lb/MMBtu CO 0.85 lb/MMBtu NO _x 3.2 lb/MMBtu Total HAP 0.00157 lb/MMBtu			
06	AP-42 3.2	PM 0.00991 lb/MMBtu PM ₁₀ 7.71E-05 lb/MMBtu SO ₂ 7.71E-05 lb/MMBtu VOC 0.118 lb/MMBtu CO 3.17 lb/MMBtu NO _x 4.08 lb/MMBtu Total HAP 0.0710 lb/MMBtu			
07	TANKS program				
09	AP-42 1.4 Nat. Gas	PM 7.6 lb/MMscf PM ₁₀ 7.6 lb/MMscf SO ₂ 0.6 lb/MMscf VOC 5.5 lb/MMscf CO 84 lb/MMscf NO _x 50 lb/MMscf Lead 0.0005 lb/MMscf Total HAP 1.89 lb/MMscf			

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)
01, 02, 03, 09	Natural Gas Usage	455,144,000 scf	Monthly	N
01	Fuel oil usage	1,047,434 gallons per year	Monthly	N
02	Fuel oil usage	1,047,434 gallons per year	Monthly	N
04	Fuel oil usage	32,490 gallons per year	Monthly	N
01, 02, 04	Fuel Oil Sulfur Content	0.5%	Monthly	N
04 & 06	Hours of Usage	100 hours/year maximum per unit for maintenance checks/readiness testing; 50 hrs/year/unit for non-emergency, but these hours counted in 100	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		hrs maximum above		
07	Gallons of gasoline throughput	10,000 gallons/rolling 12 month period	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
Facility	5%	§19.503	Inspector Observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
15	SN-06 is now subject to NSPS Subpart JJJJ

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
Natural Gas Fired Fryer	A-1	0.1	0.1	0.1	0.9	2.75		
10,000 Gallon Storage Tank Containing #2 Fuel Oil	A-3							
1,500 Gallon Storage Tank	A-3							

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Containing Used Oil								
Steam Oven Utilizing Wood Chips	A-13	0.029		0.024				
5 Truck Inline Steam Oven	A-13	Emissions accounted for under SN-01 and SN-02						

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 #
1709-AR-6

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Boar's Head Provisions Co., Inc.

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			Old Permit	New Permit
\$/ton factor	27.27	Permit Predominant Air Contaminant	76.1	76.1
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0	
Minimum Initial Fee \$	500			
		Permit Fee \$	400	
Check if Administrative Amendment	☐	Annual Chargeable Emissions (tpy)	76.1	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	4.9	4.9	0
PM ₁₀	3.9	3.9	0
PM _{2.5}	0	0	0
SO ₂	76.1	76.1	0
VOC	3	3	0
CO	34.8	34.7	-0.1
NO _x	52	52.1	0.1
Lead	0.04	0.04	0
Total HAP	0.72	0.72	0