ADEQ
MINOR SOURCE
AIR PERMIT

Permit No. : 604-AR-10

IS ISSUED TO:

Busch Agricultural Resources, Inc. – Jonesboro Rice Mill
3723 CR 905 - Highway 49 N at Farville
Jonesboro, AR 72401-0749
Craighead County
AFIN: 16-00104

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate Matter
PM_{10}	Particulate Matter Smaller Than Ten Microns
SO_2	Sulfur Dioxide
tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	Busch Agricultural Resources, Inc. – Jonesboro Rice Mill
AFIN:	16-00104
PERMIT NUMBER:	604-AR-10
FACILITY ADDRESS:	3723 CR 905 - Highway 49 N at Farville Jonesboro, AR 72401-0749
MAILING ADDRESS	3723 CR 905 - Highway 49 N at Farville Jonesboro, AR 72401-0749
COUNTY:	Craighead
CONTACT POSITION:	Dave Sund, Plant Engineer
TELEPHONE NUMBER:	870-930-2330
REVIEWING ENGINEER:	Karen Cerney
UTM North South (Y):	Zone 15: 3974
UTM East West (X):	Zone 15: 718

Section II: INTRODUCTION

Summary of Permit Activity

Busch Agricultural Resources, Inc. (BARI), a subsidiary of Anheuser-Busch Companies, Inc., operates a rice milling and storage facility near Jonesboro in Craighead County. This facility handles up to 22,300,000 bushels (500,000 tons) of rice per year, and has the capability of processing 60 tons/hour of rough rice.

This modification allows for the removal of the existing truck loading pit and conveyor (SN-01), ten small storage bins (SN-03), three mill day bins (SN-31), and the rough rice loadout systems (SN-06 and SN-66). The modification also allows for the addition of a rice truck unloading (SN-116), conveying equipment (SN-117 through SN-124), rough rice storage bins (SN-125), reject rice truck loading (SN-126), reject rice railcar loading (SN-127), and a fabric filter (SN-129). All of the new equipment will be routed to the fabric filter (SN-129). The rough rice storage bins will increase the storage capacity of the facility to 1,635,700 bushels, which will make the facility subject to the NSPS Subpart DD – Standards of Performance for Grain Elevators. Also, an existing Railcar Unloading Connection is being added to the permitted sources. The proposed changes result in a decrease of 0.1 tpy of PM_{10} and 1.1 tpy in PM.

Process Description

The Jonesboro Rice Mill stores enough rice to supply the facility during production. The facility is projected to handle up to 22,300,000 bushels of rice per year beginning in 2002. Included is a very small amount of green rice that is dried at the facility. Dried rice or green rice is received at the facility by trucks. The trucks unload the rice into a receiving pit at up to 13,500 bushels per hour. All rice is transferred via the scalpers (SN-02) to storage bins. All rice received is conveyed through one of three scalperators. A rotating wire mesh drum removes any large particles of trash and an internal fan system removes any airborne dust in the rice.

At the large rice bins, dried rice up to the 120,000 bushel bin capacity enters one of four bins from the scalpers. On occasion, dried rice is loaded into trucks for shipment. During storage, which averages 20 days, the rice is periodically aerated with ambient air using two 6150 cfm fans. The intermediate storage bins store rice from the scalpers. The storage process is identical to that of the large rice bins.

As required for shipment, dried rice is transferred from a storage bin to the truck loadout via the various conveyors at up to 6000 bushels per hour. The loadout consists of an inclined 10 inch diameter pipe through which dried rice flows by gravity. A “sock” encloses the end of the pipe to minimize dust as the dried rice drops into a truck.

The facility uses a trash removal system to collect large field trash from the screen machine. The screen machine separates the wastes from the small surge bin into three streams. The largest size

(<20 mesh) wastes go to trash removal, while the mid-size (20 to 80 mesh) wastes are pneumatically conveyed via the rough Hull Transfer (SN-12) to the Unground Hull Bin (SN-12, 73 & 74). Most of the hulls from SN-74 are transported via three screw/drag conveyors, a surge bin, a magnet, and one bucket elevator to be ground in one of two hammer mills. The smallest size (>80 mesh) wastes are pneumatically conveyed via the Rough Rice Dust Transfer (SN-13) to the Bran Receiver.

Milled rice is loaded into trucks or covered rail cars. Trucks are loaded inside a two wall shed. Rail cars are loaded in a semi-protected area having a roof and one wall. Since milled rice is virtually dust free and abrades very little in conveying, small amounts of emissions are generated. Up to two percent of the milled rice is bagged. This small operation generates essentially no emissions.

By-products (bran and hulls) are loaded into trucks or covered rail cars inside the by-product shipping building. For trucks, a vertically moving hood encloses the top of the truck trailer during loadout. Air is drawn into the hood and collects the generated dust in a fabric filter. For rail cars, three flexible spouts are lowered into the car during loadout for dust pickup. Air is drawn into the spouts and collects the adjacent dust in the same fabric filter. Air can be drawn from either the truck hood or the rail car spouts but not both. Rail cars and trucks cannot be filled simultaneously. Other processes at the facility include shelling, grading, screening, sorting, and pearling.

The mill has three large dust control systems which are connected to Fabric Filters C-31, C-32, and C-41. These systems have a dual function in that they control the dust emissions in the mill and they collect the bran by-product. The bran by-product is pneumatically transferred to five sifters (SN-111). Broken rice from the sifters will be mechanically conveyed (SN-114) to a rotary air-lock and then will be pneumatically conveyed to the reject storage bin (SN-65). A fabric filter, C-40, will be located on the pneumatic conveyor for the broken rice. Sifted bran will be mechanically conveyed (SN-113) to a rotary air lock where it will be pneumatically conveyed to SN-72, one of four bran storage bins. Whole rice will be produced from the sifters only in the event of a malfunction (i.e. screen breakage) in the rice handling systems. In the event whole rice is produced by the sifters, they will be mechanically conveyed to the front end of the whitening process by SN-112. The dust is pneumatically transferred via filter receiver to one of four bran by-product storage bins. Each elevator connects to two dust systems, one at the head and the other at the boot. Thus, their uncontrolled emissions are being split between two systems.

Generally, the equipment is enclosed to minimize fugitive emissions. Inside the building, the equipment fugitive emissions settle and remain inside. This solid material is then swept up or vacuumed up (Vacuum Cleaning System). Most pieces of equipment are connected directly to a dust collection system. Equipment with low dust potential does have a direct connection. However, the dust vents via the adjacent conveyor or elevator are connected to a dust system. Equipment used to handle the milled rice products is not connected to a dust system as the milled rice generates essentially no particulate emissions.

Based on as-received dried rough rice, the outputs are:

68% milled rice (fancy, broken, x-brewers)
9% bran (includes mill dust)
22% hulls
1% trash (includes precleaning at unloading pit).

Fumigation Process

Phosphine for Grain Fumigation

Phostoxin (aluminum phosphide) is used by the malt plant as a fumigation for grain stored on-site. Phostoxin use is partially dependent on weather conditions and may also be applied to grain being delivered if pests are detected. The Jonesboro Rice Mill minimizes the use of Phostoxin whenever possible.

The application rates for Phostoxin on grain are regulated under the Federal Insecticide, Fungicide, and Rodenticide Act.

Methyl Bromide Fumigation

The rice mill will conduct methyl bromide space fumigation of the mill building and associated processing equipment three (3) times per year. Fumigation generally occurs over a three day week-end such as Memorial Day and Labor Day. The rice mill contracts this work to pesticide companies that specialize in methyl bromide fumigation.

The contractor makes the mill building as airtight as possible with sealing techniques. Methyl bromide gas lines and monitoring stations are strategically located within the mill building. Methyl bromide is released into the mill building until the appropriate concentrations are obtained. The contractor monitors the methyl bromide levels, and, additional gas is released into the mill building as required based upon concentrations obtained from monitoring. According to the current mill contractor, the initial methyl bromide dosing conducted at Jonesboro has been sufficient for the maintenance of target doses for the entire fumigation process (i.e., no supplemental gas has to be injected into the building).

The methyl bromide fumigation process is maintained over a 20 to 24-hour period. Upon completion, the mill building is cleared of the methyl bromide gas using fans. According to the contractor, approximately 40% of the initial charge of gas remains in the building at the end of the fumigation process. The aeration process lasts approximately 3 hours, and, the contractor ensures the building is safe for entry via a final monitoring process.

Sulfuryl Fluoride Fumigation

The rice mill may conduct sulfuryl fluoride space fumigation of the mill building and associated processing equipment as an alternative to using methyl bromide. Similar to the methyl bromide fumigation process, the sulfuryl fluoride fumigation will typically be performed three times per year. At the end of the fumigation cycle, approximately 45% of the initial sulfuryl fluoride application will be purged from the facility over a three hour process.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004
40 CFR Part 60, Subpart DD - *Standards of Performance for Grain Elevators*

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Total Allowable Emissions

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	16.0	19.7
PM_{10}	8.6	16.0
Phosphine	0.70	1.90
Methyl Bromide	345.00	5.00
Sulfuryl Fluoride	1500.00	6.75

Section III: PERMIT HISTORY

348-A Permit 348-A was originally assigned to BARI on September 29, 1976, to install a rice drying and storage facility near Jonesboro, Arkansas. At that time, the facility was designed to handle approximately 2.2 million bushels of rice per year.

604-A Permit 604-A was later issued to BARI on April 25, 1980, for an expansion of rice milling operations, and rice storage capacity. This activity was regulated by 40 CFR Part 60, Subpart DD, New Source Performance Standards (NSPS).

604-AR-1 On September 25, 1981, permit 604-AR-1 modified permit 604-A to allow the additional time required (due to economic and design considerations) to proceed with construction of the proposed expansions of permit 604-A.

604-AR-2 On May 24, 1990, modified permit 604-AR-2 was issued for an increase in rough rice throughput capacity.

604-AR-3 Permit 604-AR-3 was issued on July 7, 1992, as a modification to permit 604-AR-2. This modification accounts for the installation of additional equipment, and a reduction in downtime due to equipment modification. This rerouting and enlargement of the Bran Transfer System is intended to improve its reliability and reduce mill restrictions. As previously stated, the mill throughput is expected to be 62,500 pounds per hour. Similarly, emission allowances are increased in proportion to throughput from the prior permit levels.

604-AR-4 Permit 604-AR-4 was issued on October 7, 1997, as a modification to permit 604-AR-3. BARI is proposing to modify the existing permit in order to re-evaluate New Source Performance Standards Subpart DD applicability and to obtain higher annual permitted production limits.

604-AR-5 Permit 604-AR-5 was issued on March 24, 2000, as a modification to permit 604-AR-4. This mill proposed to keep process throughput limits at 15 million bushels, thus, no changes in overall emissions were expected from this modification. BARI proposed the following modification to the existing permit:

1. Install 4 additional Carter-Day #618 Precision Size Graders (SN-36) and associated conveying equipment.

2. Eliminate the Stick Machine (SN-34) and Reclaim Rotex (SN-35).

3. Replace two screw conveyors used to transfer rough rice from the day tanks to the mill for processing (SN-21, equipment numbers 30-204 and 30-205).

4. Replace six of the eight existing shellers (SN-40). The existing shellers are designed to process 1000 hundred weights (cwts) of rough rice per hour (50 tons/hour). Rough rice processing will not increase as a result of replacing the six shellers.

5. Replace all five (5) existing uniflow separators (SN-52). The current processing rate for the uniflows is 1000 cwts/hour (50 tons/hour) which will remain the same with the installation of the new equipment.

6. Replace all three existing precision graders with new like graders (SN-53). The current processing rate for fancy white rice is 1000 cwts/hour (50 tons/hour) which will remain the same with the installation of the new equipment.

604-AR-6 Permit 604-AR-6 was issued on March 28, 2001, as a modification to permit 604-AR-5. This mill proposed to increase the annual throughput from 340,875 to 400,000 tons (17.8 million bushels). Updated AP-42 emission factors were used in calculating emissions associated with increased production which resulted in annual PM_{10} emissions less than the emissions indicated in permit 604-AR-5. Also the insignificant activities list was updated, and Specific Condition 6 was revised as follows:

1. Pursuant to 19.705 of Regulation 19 and A.C.A. 8-4-203 as referenced by 8-4-304 and 8-4-311, the facility shall not mill more than 400,000 tons of grain per consecutive twelve-month period.

604-AR-7 Permit 604-AR-7 was issued on December 27, 2001, as a modification to permit 604-AR-6. The mill increased the annual throughput from 400,000 tons to 500,000 tons (23 million bushels) of rice per year. An extensive modernization program was initiated which included replacement of old equipment, and the installation of new process equipment, and an additional fabric filter (SN-110) to control emissions from the new processing equipment.
This permit also included the conversion of four (4) bran storage bins, having a combined storage capacity of 20,800 bushels, to ground hull storage. A new bran storage bin having a capacity of 12,100 bushels was installed to replace all four (4) converted bran storage bins. The total by-product storage capacity will increase from 52,000 bushels to 64,100 bushels. Emissions associated with this change in by-product storage did not increase, but the process throughput for the mill changed.

604-AR-8 Permit 604-AR-8 was issued on March 24, 2003, as a modification to permit 604-AR-7. The facility increased the yearly use of methyl bromide for pest control fumigation. Non-stack emissions of the fumigant methyl bromide increased from 3 tons per year to 5 tons per year. However, the hourly emission rate (lbs/hr) did not change.

604-AR-9 Permit 604-AR-9 was issued on June 18, 2004, as a modification to permit 604-AR-8. This modification allowed for the installation of five new Sweco XS-60 sifters and associated conveyors, one new Satake RMGS-840 color sorter, and utilization of a new fumigation chemical. The new sifters were designed to separate whole and broken rice from the current bran stream. The pneumatic system would transfer broken rice from the sifters, mill sweepings and other rejects to the existing reject storage bin. The new color sorter was installed to provide additional retention time during the rice color sorting process. Utilization of a new fumigation chemical would ultimately replace use of methyl bromide. This permitting action allowed an increase in PM/PM10 emissions by 2.4 tons per year (tpy) and sulfuryl fluoride emissions by 6.75 tpy.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee will not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Specific Conditions 6, 8, and 15. [§19.501 *et seq.* of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective December 19, 2004 (Regulation 19) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Rice Receiving	Removed		
03	Ten (10) Small Storage Bins	Removed		
04	Four (4) Large Storage Bins	PM_{10}	1.2	0.7
05	Three (3) Intermediate Storage Bins	PM_{10}	1.2	0.3
06	Truck Loadout	Removed		
02, 07, 08, 09, & 11	Trash Removal	PM_{10}	0.1	0.1
10	Receiving Dust Collection	PM_{10}	0.1	0.1
31	Three Mill Day Bins	Removed		
59; with emissions from 100-104, 40, 42, 44, 21-26, 54-58, 61-64, 87-90, 92, 95, and 68	Mill Rough Rice Dust Collector C-31	PM_{10}	0.1	0.4
60; with emissions from 105-107, 52-54, 57, 40, 42, 50, 52, 53, 56, 79, 86, 91, 93, 94, and 96	Mill White Rice Dust Collector C-32	PM_{10}	0.1	0.1
66	Reject Loadout	Removed		
67	Milled Rice Storage	PM_{10}	0.3	0.9

SN	Description	Pollutant	lb/hr	tpy
69	Milled Rice Bagging	PM_{10}	0.1	0.1
70	Milled Rice Loadout	PM_{10}	0.5	0.6
13, 61, 71	Bran Transfer & Rough Rice Transfer	PM_{10}	0.1	0.1
72	Bran Storage – Five Bins	PM_{10}	0.2	1.4
12, 73, 74	Unground Hull Storage	PM_{10}	0.2	0.1
76	Hammermills	PM_{10}	0.1	0.1
77	Ground Hull Storage – Nine Bins	PM_{10}	2.0	5.5
78	By-product Loadout	PM_{10}	0.8	3.5
96	Rice Cracker and Aspirator	PM_{10}	0.1	0.1
110; with emissions from 108, 54, 55, 57, and 109	Bran Dust Collector C-39	PM_{10}	0.1	0.1
111	Bran Sifters - Five	PM_{10}	0.1	0.4
112	Whole Rice Conveyors	PM_{10}	0.1	0.1
113	Bran Mechanical Conveyors	PM_{10}	0.1	0.4
114	Broken Rice Mechanical Conveyors	PM_{10}	0.1	0.1
115	Broken Rice Pneumatic Conveyors	PM_{10}	0.1	0.1
128	Railcar Unloading Connection	PM_{10}	0.5	0.1
129; with emissions from 116-127	Rough Rice System Duct Collector	PM_{10}	0.3	0.6

2. The permittee will not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Specific Conditions 6, 8, 13, and 15. [§18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Rice Receiving	Removed		
03	Ten (10) Small Storage Bins	Removed		
04	Four (4) Large Storage Bins	PM	4.5	2.8
05	Three (3) Intermediate Storage Bins	PM	4.5	1.3
06	Truck Loadout	Removed		
02, 07, 08, 09, & 11	Trash Removal	PM	0.1	0.1
10	Receiving Dust Collection	PM	0.2	0.2
31	Three Mill Day Bins	Removed		
59; with emissions from 100-104, 40, 42, 44, 21-26, 54-58, 61-64, 87-90, 92, 95, and 68	Mill Rough Rice Dust Collector C-31	PM	0.1	0.4
60; with emissions from 105-107, 52-54, 57, 40, 42, 50, 52, 53, 56, 79, 86, 91, 93, 94, and 96	Mill White Rice Dust Collector C-32	PM	0.1	0.1
66	Reject Loadout	Removed		
67	Milled Rice Storage	PM	0.2	1.0
69	Milled Rice Bagging	PM	0.1	0.1
70	Milled Rice Loadout	PM	0.5	0.5
13, 61, 71	Bran Transfer & Rough Rice Transfer	PM	0.1	0.1

SN	Description	Pollutant	lb/hr	tpy
72	Bran Storage – Five Bins	PM	0.2	1.4
12, 73, 74	Unground Hull Storage	PM	0.1	0.1
76	Hammermills	PM	0.1	0.1
77	Ground Hull Storage – Nine Bins	PM	2.0	5.5
78	By-product Loadout	PM	0.8	3.5
96	Rice Cracker and Aspirator	PM	0.1	0.1
110; with emissions from 108, 54, 55, 57, and 109	Bran Dust Collector C-39	PM	0.1	0.1
97	Fumigation Process	Phosphine	0.7	1.9
		Methyl Bromide	345.00	5.00
		Sulfuryl Fluoride	1,500.00	6.75
111	Bran Sifters - Five	PM	0.1	0.4
112	Whole Rice Conveyors	PM	0.1	0.1
113	Bran Mechanical Conveyors	PM	0.1	0.4
114	Broken Rice Mechanical Conveyors	PM	0.1	0.1
115	Broken Rice Pneumatic Conveyors	PM	0.1	0.1
128	Railcar Unloading Connection	PM	1.3	0.2
129; with emissions from 116 - 127	Rough Rice System Duct Collector	PM	0.4	1.0

3. Visible emissions will not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation

SN	Limit	Regulatory Citation
04	20%	§18.501
05	5%	§18.501
02, 07, 08, 09, & 11	5%	§18.501
10	5%	§18.501
59; with emissions from 100-104, 21-26, 40, 42, 44, 54, 55, 57, 58, 61-64, 79, 87-90, 92, 95 and 68	5%	§18.501
60; with emissions from 105-107, 40, 41, 50, 52, 53, 56, 86, 91, 93, 94, and 96	5%	§18.501
67-69	20%	§18.501
70	20%	§18.501
13, 61, 71	5%	§18.501
72	20%	§18.501
12, 73, 74	5%	§18.501
76	5%	§18.501
77	20%	§18.501
78	5%	§18.501
110; with emissions from 108, 54, 55, 57, and 109	5%	§18.501
111	20%	§18.501
112	20%	§18.501
113	20%	§18.501
114	20%	§18.501
115	5%	§18.501
128	5%	40 CFR §60.302

SN	Limit	Regulatory Citation
129; with emissions from 116-127	0%	40 CFR §60.302

4. The permittee will not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation 18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [§18.901 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

5. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [§18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. The facility will not mill more than 500,000 tons of grain per consecutive twelve month period, and all grain received at the facility must be milled. (Note: Facility requested to keep records of grain milled rather than grain received). [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. The permittee will maintain monthly records which demonstrate compliance with Specific Condition 6. Records will be updated by the fifteenth day of the month following the month to which the records pertain. These records will be kept on site, and will be made available to Department personnel upon request. A twelve month rolling total and each individual month's data will be kept on site. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

8. The permittee will maintain and operate the moving vertical hood (by-product truck loadout SN-78) at all times when the loadout operations are in progress. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

9. The permittee will dedicate by-product storage bins SN-74, and SN-77 to the storage of by-products (hulls) only. The by-product storage bins (hulls) capacity will not exceed 52,000 bushels, and will be excluded from the use of storage for grain. [§19.705 of Regulation 19, §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

10. The permittee will dedicate bran storage bins SN-72, to the storage of bran only. The bran storage bins' capacities will not exceed a total of 32,900 bushels and will be excluded from the use of storage for grain. [§19.705 of Regulation 19, §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

11. The permittee will store only processed rice in milled rice storage bins SN-67. The milled rice storage bins will be excluded from the use of storage for field grain. [§19.705 of Regulation 19, §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

12. The permittee will label all control equipment and associated emission points for easy identification. A complete equipment list is included in Appendix A. [§19.703 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

13. The permittee will not use more than 5.8 tons of aluminum phosphide, 5 tons of methyl bromide, and 15 tons of sulfuryl fluoride per consecutive 12 month period. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

14. The permittee will maintain monthly records which demonstrate compliance with the usage limits in Specific Condition 13. Records will be updated by the fifteenth day of the month following the month to which the records pertain. These records will be kept on site, and will be made available to Department personnel upon request. A twelve month rolling total and each individual month's data will be kept on site. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

15. The control equipment associated with this facility will be maintained and operated in serviceable condition prescribed by the manufacturer during the operation of the plant. [§19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

NSPS Requirements

16. The permittee will conduct an initial test for SN-129 to determine compliance with the opacity limits specified in Specific Condition 3 and the 0.01gr/dscf particulate matter limit. EPA Reference Method 9 should be used for opacity, Method 5 for particulate matter emissions, and the procedures in §60.11 will also be used. [§19.304 of Regulation 19 and 40 CFR §60.303 and §60.8 Appendix A and in accordance with General Condition 7 and 8].

17. The facility will not emit more than 0.01 gr/dscf of particulate emissions or exhibit more than 0% opacity from SN-129. [§19.705 of Regulation 19 and 40 CFR 60.302(b)]

Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated March 23, 2004.

Description	Category
20 burners rated at 1 million BTU/hr	A-1
Two (2) - 1,000 gallon gasoline tanks	A-3
One (1) - 500 gallon diesel fuel tanks	A-3
Containers of less than or equal to 5 gallons in capacity	A-8

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.

2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [§19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [§19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [§19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

   Arkansas Department of Environmental Quality
   Air Division

ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

8. The permittee will provide: [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
   a. Sampling ports adequate for applicable test methods
   b. Safe sampling platforms
   c. Safe access to sampling platforms
   d. Utilities for sampling and testing equipment

9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [§19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [§19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

    a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
    b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
    c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and

nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
    a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
    b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
    c. To inspect any monitoring equipment or monitoring method required in this permit;
    d. To sample any emission of pollutants; and
    e. To perform an operation and maintenance inspection of the permitted source.

12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [§19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [§19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]

APPENDIX A

Source Number	Description	Control Equipment	Equipment Number
1	Rice Receiving Pit - Removed	N/A	28-201
2	Surge Bin, Rough Rice Cleaners 1, 2, & 3	Fabric Filter (C-1)	28-301-1, -2, -3
3	Small Storage Bins (1-10) - Removed	N/A	28-001 thru -010
4	Large Storage Bins (11-14)	None	28-011 thru -014
5	Intermediate Storage Bins (15-18)	None	28-015 thru -018
6	Rough Rice Truck Loadout - Removed	N/A	28-209
7	Drag / Screw Conveyors (6 units)	Fabric Filter (C-1)	28-201 thru 28-204, -210, -217
8	Bucket Elevators (3 units)	Fabric Filter (C-1)	28-101 thru -103
9	Trash Removal	None	Trash Tank
10	Receiving Dust Collection	Fabric Filter (C-1)	28-631
11	Screener	Fabric Filter (C-1)	28-302
12	Rough Rice Hull Transfer Receiver	Fabric Filter (C-34 and C-35)	34-704
13	Rough Rice Dust Transfer Receiver	Fabric Filter (C-33)	34-705
21	Bucket Elevators (8 Units)	Fabric Filter (C-31 and C-32)	31-101, -103, -104, -106, -107, -111, -112, -115
22	Bucket Elevators (3 units)	Fabric Filter (C-31 and C-32)	31-102, -109, -113
23	Bucket Elevators (4 units)	Fabric Filter (C-31 and C-32)	31-105, -108, -114, -119
24	Bucket Elevator (1 unit)	Fabric Filter (C-31 and C-32)	31-110
25	Bucket Elevator (1 unit)	Fabric Filter (C-31 and C-32)	31-120, -121, -122
26	Bucket Elevators (2 units)	Fabric Filter (C-31 and C-32)	31-123, -124
31	Mill Day Tanks (3 units) - Removed	N/A	30-001, -002, -003
32	Rough Rice Bulk Scale REMOVED	Fabric Filter (C-32)	31-301
33	Screen Machines (2 units) REMOVED	Fabric Filter (C-32)	31-302-1, -2
34	Stick Machine NO LONGER IN SERVICE [DISMANTLED]		
35	Reclaim Rotex		

Source Number	Description	Control Equipment	Equipment Number
	NO LONGER IN SERVICE [DISMANTLED]		
36	Precision Graders (4 units) REMOVED	Fabric Filter (C-32)	31-305-1, -2, -3, -4
37	Precision Grader (1 unit) REMOVED	Fabric Filter (C-32)	31-305-9
38	Disc Graders (3 units) REMOVED	Fabric Filter (C-32)	31-306-1, -2, -3
39	Disc Grader (Reclaim) REMOVED	Fabric Filter (C-32)	31-332
40	Shellers (8 units)	Fabric Filter (C-32)	31-307-1 thru -8
41	Paddy Separators (3 units)	Fabric Filter (C-32)	31-308-1, -2, -3
42	Precision Grader	Fabric Filter (C-31)	31-310
43	Precision Graders (2 units) REMOVED	Fabric Filter (C-32)	31-309-1, -2
44	Volumetric Feeder (Lime)	Fabric Filter (C-31)	31-312
45	Pearlers – Main Line (15 units) REMOVED	Fabric Filter (C-31)	31-311-1 thru -15
46	Aspirator REMOVED	Fabric Filter (C-31)	31-313
47	Screeners (3 units) REMOVED	None	31-312-1, -2, -3
48	Volumetric Feeder (Talc) NO LONGER IN SERVICE [DISMANTLED]		
49	Trumble NO LONGER IN SERVICE [DISMANTLED]		
50	Aspirator	Fabric Filter (C-32)	31-330-A
51	Disc Graders (3 units) NO LONGER IN SERVICE [DISMANTLED]		
52	Uniflow Graders (5 units)	Fabric Filter (C-32)	31-318-1 thru -5
53	Precision Graders (3 units)	Fabric Filter (C-32)	31-319-1, -2, -3
54	Pearlers (2 units)	Fabric Filter (C-31)	31-311-16 and -17
55	Aspirator	Fabric Filter (C-31)	31-314
56	Precision Graders (2 units)	Fabric Filter (C-32)	31-340, 31-341
57	Pearlers – X-brewers	Fabric Filter (C-31)	31-311-18
58	Aspirator (Moved in series with SN-55)	Fabric Filter (C-31)	31-315
59	Mill Rough Rice Dust Collector	Fabric Filter (C-31)	31-601
60	Mill White Rice Dust Collector	Fabric Filter (C-32)	31-604
61	Bran Screening	Fabric Filter (C-31)	31-333

Source Number	Description	Control Equipment	Equipment Number
62	Broken Screening	Fabric Filter (C-31)	31-342
63	Precision Grader	Fabric Filter (C-31)	31-322
64	Color Sorter – Main Line (5 units)	Fabric Filter (C-31)	31-330-1 thru -5 and 31-359
65	Reject Rice Bin	None	32-040
66	Reject Loadout -Removed	N/A	33-241
67	Milled Rice Storage (10 units)	None	32-001 thru -004 32-020 thru -022 32-030 thru -032
68	Scalpers (2 units)	Fabric Filter (C-32)	32-301, 32-302
69	Milled Rice Bagging	None	33-301
70	Milled Rice Loadout	Sock	33-203, 33-204
71	Bran Transfer	None	31-703
72	Bran Storage (5 units): 1-12,100 Bushel Bin and 4 Emergency Bins – 5200 Bushels for Each of the 4 Bins	Fabric Filter (C-39)	34-061 and 34-041 thru -044
73	Hull Transfer System (2 units)	None	36-101 and 36-201
74	Unground Hull Storage	Fabric Filter (C-34 and C-35)	34-040
75	Hull Baler NO LONGER IN SERVICE [DISMANTLED]		
76	Hammermill System (13 units)	Fabric Filter (C-36)	34-060, -101, -103, -205, -220, -221, -301, -302A, -302B, -303, -304, -701, -702
77	Ground Hull Storage (9 units)	None	34-041 thru -049
78	By Products Loadout (2 units)	Fabric Filter (C-37)	35-202 and 34-203
79	Color Sorter (Brewers)	Fabric Filter (C-31)	31-330-7
86	Screw Conveyors (4 units)	Fabric Filter (C-32)	31-201, -208, -214, -223
87	Screw Conveyors (10 units)	Fabric Filter (C-31)	31-202, -203, -205, -210, -212, -218, -219, -222, -243, -246
88	Screw Conveyors (6 units)	Fabric Filter (C-31)	31-204, -206, -206A, -209, -213, -216, -221
89	Screw Conveyors (5 units)	Fabric Filter (C-31)	31-207, -207A, -229, -232, -247, -273
90	Screw Conveyor	Fabric Filter (C-31)	31-215
91	Screw Conveyor	Fabric Filter (C-32)	31-217
92	Screw Conveyors (3 units)	Fabric Filter (C-31)	31-220, -228, -240
93	Screw Conveyor	Fabric Filter (C-32)	31-227

Source Number	Description	Control Equipment	Equipment Number
94	Screw Conveyors (2 units)	Fabric Filter (C-32)	31-230 and 31-248
95	Pearler Conveyor	Fabric Filter (C-31)	31-237
96	Rice Cracker and Aspirator	Fabric Filter (C-32)	31-345 and 31-347
100	Conveyors, Scales, and Other Incidental Equipment Vented to Mill Rough Rice Dust Collector, SN-59	Fabric Filter (C-31)	See List
101	Rough Rice Paddy Cleaners	Fabric Filter (C-31)	See List
102	Reel Scalpers	Fabric Filter (C-31)	31-761
103	Destoners	Fabric Filter (C-31)	31-780
104	Bucket Elevators Vented to the Mill Rough Rice Dust Collector, SN-59	Fabric Filter (C-31)	31-151
105	Sweco Screeners (4)	Fabric Filter (C-32)	31-791, -793, -795, and -797
106	Conveyors (and Incidental Equipment) Associated with Control Device C-32, Mill White Rice Dust Collection	Fabric Filter (C-32)	31-552, See List
107	Elevator Legs Associated with C-32	Fabric Filter (C-32)	31-112
108	Three Break Whitener System	C-39	31-831 to 31-893
109	White Rice Drag Conveyor	C-39	31-550
110	Bran Dust Collector, designated as Fabric Filter C-39	N/A	
111	Bran Sifters (5)	Enclosed System	
112	Whole Rice Conveying	Enclosed System	
113	Bran Mechanical Conveying	Enclosed System	
114	Broken Rice Mechanical Conveying	Enclosed System	
115	Broken Rice Pneumatic Conveying	Fabric Filter (C-40)	
116	Rice Truck Unloading	Fabric Filter (C-41)	None Designated
117	Receiving Chain Conveyor	Fabric Filter (C-41)	28-552
118	Receiving Leg	Fabric Filter (C-41)	28-152
119	4 Transfer Chain Conveyors	Fabric Filter (C-41)	28-554, 28-556 to 28-558
120	4 Reversing Chain Conveyors	Fabric Filter (C-41)	28-559 to 28-562
121	2 Transfer Chain Conveyors	Fabric Filter (C-41)	28-563 and 28-564
122	2 Transfer Chain Conveyors	Fabric Filter (C-41)	28-565 and 28-570
123	2 Reversing Chain Conveyors	Fabric Filter (C-41)	28-571 and 28-572
124	Mill Transfer Bucket Elevator	Fabric Filter (C-41)	28-155
125	Rough Rice Storage Bins	Fabric Filter (C-41)	None Designated

Source Number	Description	Control Equipment	Equipment Number
126	Reject Rice Truck Loading	Fabric Filter (C-41)	None Designated
127	Reject Rice Railcar Loading	Fabric Filter (C-41)	None Designated
128	Existing Railcar Unloading Connection	None	None Designated
129	Rough Rice System Dust Collector, designated as Fabric Filter C-41	N/A	None Designated