

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2215-AR-2 AFIN: 18-00881

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Consolidated Grain and Barge Co.  
896 S. Walker Avenue  
West Memphis, Arkansas 72301

3. PERMIT WRITER:

Amanda Leamons

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Grain and Field Bean Merchant Wholesalers  
NAICS Code: 424510

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
11/3/2022	Modification	Increase the annual truck loadout (SN-13) thru-put from 1MM bushels to 2MM bushels.

6. REVIEWER'S NOTES:

The facility has a total storage capacity of less than 2.5 million bushels and is not subject to the New Source Performance Standards (NSPS). The facility unloads grain from trucks and transfers products to barges and occasionally to trucks.

This permit revision allows CGB to increase their annual truck loadout through put (SN-13) from 1,000,000 bushels to 2,000,000 bushels. Annual permitted emission limits were increased by 0.6 ton of PM and by 0.3 ton of PM<sub>10</sub>.

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 pending or active compliance issues or enforcement actions.

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? NA

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)
	None	

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: NA

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

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 Division of Environmental Quality 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 NA  
 If exempt, explain: The facility does not emit hydrogen sulfide

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-42-9.9.1-1	PM: 0.025 lb/ton PM <sub>10</sub> : 0.0063 lb/ton	None	N/A	TPY based on annual throughput
02	AP-42-9.9.1-1	PM: 0.025 lb/ton PM <sub>10</sub> : 0.0063 lb/ton	None	N/A	
03	AP-42-9.9.1-1	PM: 0.025 lb/ton PM <sub>10</sub> : 0.0063 lb/ton	None	N/A	
04	AP-42-9.9.1-1	PM: 0.025 lb/ton PM <sub>10</sub> : 0.0063 lb/ton	None	N/A	
05	AP-42-9.9.1-1 & 1.5-1	Grain Elevators: PM: 0.22 lb/ton PM <sub>10</sub> : 0.055 lb/ton Fuel Combustion: PM/ PM <sub>10</sub> : 0.0007 lb/gal SO <sub>2</sub> : 0.0015 lb/gal NO <sub>x</sub> : 0.013 lb/gal VOC: 0.001 lb/gal CO: 0.0075 lb/gal	None	N/A	TPY based on propane usage of 300,000 gallons of propane  2,340 hr/yr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
06	AP-42-9.9.1-1 & 1.5-1	Grain Elevators: PM: 0.22 lb/ton PM <sub>10</sub> : 0.055 lb/ton Fuel Combustion: PM/ PM <sub>10</sub> : 0.0007 lb/gal SO <sub>2</sub> : 0.0015 lb/gal NO <sub>x</sub> : 0.013 lb/gal VOC: 0.001 lb/gal CO: 0.0075 lb/gal	None	N/A	TPY based on propane usage of 300,000 gallons of propane  2,340 hr/yr
07	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With a 90% collection efficiency	Filter System	98%	TPY based on annual throughput
08	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With a 90% collection efficiency	Filter System	98%	
09	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With a 90% collection efficiency	Filter System	98%	
10	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With a 90% collection efficiency	Filter System	98%	
07	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With 10% fugitive emissions	None	None	TPY based on annual throughput
08a	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With 10% fugitive emissions	None	None	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
09a	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With 10% fugitive emissions	None	None	
10a	AP-42-9.9.1-1	Straight Truck: 0.18 lb/ton PM 0.059 lb/ton PM <sub>10</sub> With 10% fugitive emissions	None	None	
11	AP-42-9.9.1-1	PM: 0.061 lb/ton PM <sub>10</sub> : 0.034 lb/ton	Fully enclosed	99%	Annual Throughput: 42,000,000 bushels
12	AP-42-9.9.1-1	PM: 0.016 lb/ton PM <sub>10</sub> : 0.004 lb/ton	Telescopic Spout	50%	Annual Throughput: 41,000,000 bushels
13	AP-42-9.9.1-1	PM: 0.086 lb/ton PM <sub>10</sub> : 0.029 lb/ton	Loadout Socks	50%	Annual Throughput: 2,000,000

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
NONE				

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)
NONE				

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)
05 & 06	Annual propane usage	300,000 gal (both sources combined)	Monthly	N
	Annual throughput of grain	10,000,000 bushels	Monthly	N
07, 08, 09 & 10	Annual throughput of grain	42,000,000 bushels	Monthly	N
12	Annual throughput of grain	41,000,000 bushels	Monthly	N
13	Annual throughput of grain	2,000,000 bushels	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
05 and 06	20%	Rule 19.503	Observation
01-04 and 11-13	20%	Rule 18.501	Observation
07, 08, 09, 10	Dust Filter System: 10%	Rule 18.501	Observation
	Fugitives: 20%	Rule 19.503	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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
NONE								

Permit #: 2215-AR-2

AFIN: 18-00881

Page 7 of 7

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 #
2215-AR-1





APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Consolidated Grain and Barge Co.

Permit Number: 2215-AR-2

AFIN: 18-00881

			Old Permit	New Permit
\$/ton factor	27.27	Permit Predominant Air Contaminant	64.9	65.5
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0.6	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	400	
		Annual Chargeable Emissions (tpy)	65.5	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	64.9	65.5	0.6
PM <sub>10</sub>	18	18.3	0.3
PM <sub>2.5</sub>	0		0
SO <sub>2</sub>	0.3	0.3	0
VOC	0.2	0.2	0
CO	1.2	1.2	0
NO <sub>x</sub>	2	2	0
Total HAP	0.15	0.15	0