



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Curt Fransen, Director

September 23, 2013

Keith Becker, Operations Manager
Pacific Northwest Farmers Co-Op Inc.
P.O. Box 151
Colfax WA 99111

RE: Facility ID No. 069-00011, Pacific Northwest Farmers Co-Op Inc., Lewiston
Final Permit Letter

Dear Mr. Becker:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2013.0047 Project 61246 to Pacific Northwest Farmers Co-Op Inc. located at Lewiston for the pea and lentil facility. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received August 5, 2013.

This permit is effective immediately. This permit does not release Pacific Northwest Farmers Co-Op Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Lewiston Regional Office, 1118 "F" Street, Lewiston, ID 83501, Fax (208) 799-3451.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Teresa Hiebert, Air Quality Analyst, at (208) 799-4892 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Carole Zundel at (208) 373-0477 or carole.zundel@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSVCZ
Permit No. P-2013.0047 PROJ 61246
Enclosures

AIR QUALITY

PERMIT TO CONSTRUCT

Permittee Pacific Northwest Farmers Co-Op Inc.
Permit Number P-2013.0047
Project ID 61246
Facility ID 069-00011
Facility Location 1422 3rd Avenue N.
Lewiston, ID 83501

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200-228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200-228.

Date Issued September 23, 2013

Carole Zundel

Carole Zundel, Permit Writer

Mike Simon

Mike Simon, Stationary Source Manager

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1. Permit Scope

Purpose

- 1.1 This is an initial permit to construct (PTC), which also revises an existing PTC for a pea and lentil cleaning operation under new ownership (see SOB), for a pea and lentil cleaning operation.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC is based on the pea and lentil section of Permit to Construct No. P-2012.0027, issued on September 22, 2004, which was replaced by Permit to Construct No. P-2013.0039.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1. Regulated sources.

Source	Control Equipment
West truck dump	None
Delta 107 pea and lentil cleaner	Delta 107 baghouse Kice Model S100-10

2. Pea and Lentil Cleaning Operation

2.1 Process Description

Pacific Northwest Farmers Cooperative operates a grain cleaning operation at 1422 3rd Avenue North in Lewiston, Idaho on land leased from Lewis-Clark Terminal. The grain cleaning operation consists of receiving pea and/or lentils by truck or rail and off-loading at the truck dump (EU#2), cleaning the grains in a Delta 107 cleaner manufactured by Cimbria Manufacturing A/S (EU#1), transferring the grains to one of two steel storage bins (EU#3), packaging the grains in-doors, and transporting the packaged grains off-site by truck or rail.

2.2 Control Device Descriptions

Particulate emissions from the cleaner are controlled by a baghouse.

Table 2.1. Pea and lentil cleaning description.

Emissions Units / Processes	Control Devices
West truck dump	Uncontrolled
Delta 107 pea and lentil cleaner Cimbria Manufacturing A/S	Delta 107 baghouse Kice Model S100-10

Emission Limits

2.3 Opacity Limit

Emissions from the pea and lentil cleaning operation stack, or any other stack, vent, or functionally equivalent opening associated with the pea and lentil cleaning operation, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[9/23/2013]

Operating Requirements

2.4 Requirement to Use Baghouse

The permittee shall use the Delta 107 baghouse to control emissions from the grain cleaner.

[9/23/2013]

2.5 Baghouse Pressure Drop

A device to measure the pressure drop across the baghouse shall be installed within 60 days of the issuance of this permit. The pressure drop across the baghouse shall be operated and maintained within manufacturer and O&M specifications. Documentation of the operating pressure drop specifications for the baghouse shall remain onsite at all times and shall be made available to DEQ representatives upon request.

2.6 Fugitive Dust

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne. In determining what is reasonable, consideration will be given to factors such as the proximity of dust emitting operations to human habitations and/or activities, the proximity to mandatory Class I Federal Areas and atmospheric conditions which might affect the movement of particulate matter. Some of the reasonable precautions may include, but are not limited to, the following:

- Use of Water or Chemicals. Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
- Application of Dust Suppressants. Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- Use of Control Equipment. Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering of Trucks. Covering, when practical, open bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving. Paving of roadways and their maintenance in a clean condition, where practical.
- Removal of Materials. Prompt removal of earth or other stored material from streets, where practical.

[9/23/2013]

2.7 Material Throughput

- The process rate of material through the cleaner shall not exceed 41,600 tons per any consecutive 12-month period (T/yr).
- The process rate of material through the cleaner shall not exceed 480 tons per day (T/day).

2.8 Baghouse/Filter System Procedures

Within 60 days of initial start-up, the permittee shall have developed a Baghouse/Filter System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from the Delta 107 Baghouse. The Baghouse/Filter System Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse/Filter System Procedures document shall include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at anytime. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The Baghouse/Filter System Procedures document shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.9 The Permittee shall maintain records of the results of each baghouse/filter system inspections in accordance with the general provisions in this permit. The records shall include , but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

Monitoring and Recordkeeping Requirements

2.10 Opacity Monitoring

The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions, when the facility is in operation, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

- a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

- b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.

[9/23/2013]

2.11 Baghouse Pressure Drop Records

The permittee shall record and maintain records of the pressure drop for the Delta 107 baghouse once per day when operating.

[9/23/2013]

2.12 Fugitive Dust Monitoring

The permittee shall conduct monthly facility-wide inspections of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive dust emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive dust emissions were present (if observed), any corrective action taken in response to the fugitive dust emissions, and the date the corrective action was taken. A compilation of the most recent five years of records shall be kept onsite and made available to DEQ representatives upon request.

[9/23/2013]

2.13 Throughput Monitoring

The permittee shall monitor and record in tons the process rate of material through the cleaner once per day to demonstrate compliance with the daily limit. The daily process rate data shall be summed once per month to demonstrate compliance with the consecutive 12-month throughput permit limit.

[9/23/2013]

3. General Provisions

General Compliance

- 3.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)
[Idaho Code §39-101, et seq.]
- 3.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
[IDAPA 58.01.01.211, 5/1/94]
- 3.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.
[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

- 3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
 - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108]

Construction and Operation Notification

- 3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.
[IDAPA 58.01.01.211.02, 5/1/94]
- 3.6 The permittee shall furnish DEQ written notifications as follows:
- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
 - A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
 - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and

- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 3.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 3.9 Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 3.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

- 3.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 3.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

- 3.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

- 3.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

- 3.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

- 3.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]