



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
Toni Hardesty, Director

May 23, 2005

**Certified Mail No. 7000 1670 0013 8129 0218**

Kirby Kraft  
Director, Malt Operations  
Busch Agricultural Resources, Inc.  
3636 S. Geyer Rd  
St. Louis, MO 63127

RE: Facility ID No. 051-00015, Busch Agricultural Resources, Inc., Idaho Falls  
Final Permit Letter

Dear Mr. Kraft:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-040523 for Busch Agricultural Resources in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on October 12, 2004. This permit is effective immediately and replaces your previous permit number 051-00015 issued on December 13, 1995. This permit does not release Busch Agricultural Resources from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Idaho Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations 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 call Daniel Pitman at (208) 373-0500 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/DP/sd  
Enclosures

Permit No. P-040523



**Air Quality**  
**PERMIT TO CONSTRUCT**  
**State of Idaho**  
**Department of Environmental Quality**

**PERMIT No.:** P-040523  
**FACILITY ID No.:** 051-00015  
**AQCR:** 61                      **CLASS:** SM  
**SIC:** 5153                      **ZONE:** 12  
**UTM COORDINATE (km):** 408.0, 4831.0

1. **PERMITTEE**  
Busch Agricultural Resources, Inc.

2. **PROJECT**  
Increased throughput and additional storage bins for seed conditioning facility

3. <b>MAILING ADDRESS</b> 3421 E. County Line Road	<b>CITY</b> Idaho Falls	<b>STATE ID</b>	<b>ZIP</b> 83401
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4. <b>FACILITY CONTACT</b> Kirby Kraft	<b>TITLE</b> Director, Malt Operations	<b>TELEPHONE</b> (208) 529-2672
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5. <b>RESPONSIBLE OFFICIAL</b> Richard Emerson	<b>TITLE</b> Vice President, Operations	<b>TELEPHONE</b> (208) 529-2672
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6. <b>EXACT PLANT LOCATION</b> SW ¼ of Section 32, T4N R38E, Jefferson County, corner of County Line Road and Lewisville Highway	<b>COUNTY</b> Jefferson
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7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Small grain seed conditioning

8. **GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and 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.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the 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.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

  
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**TONI HARDESTY, DIRECTOR**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:** May 23, 2005

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## **Acronyms, Units, and Chemical Nomenclature**

<b>AQCR</b>	<b>Air Quality Control Region</b>
<b>CFR</b>	<b>Code of Federal Regulations</b>
<b>DEQ</b>	<b>Department of Environmental Quality</b>
<b>IDAPA</b>	<b>a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act</b>
<b>km</b>	<b>kilometer</b>
<b>PM<sub>10</sub></b>	<b>particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers</b>
<b>PTC</b>	<b>permit to construct</b>
<b>SIC</b>	<b>Standard Industrial Classification</b>
<b>SM</b>	<b>synthetic minor</b>
<b>UTM</b>	<b>Universal Transverse Mercator</b>

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040523**

<b>Permittee:</b>	Busch Agricultural Resources, Inc.	<b>Facility ID No.</b> 051-00015	<b>Date Issued:</b>	May 23, 2005
<b>Location:</b>	Idaho Falls			

**1. PERMIT TO CONSTRUCT SCOPE**

**Purpose**

- 1.1 The purpose of this permit to construct is to permit the increase in throughput and the addition of seed storage bins.
- 1.2 This PTC modifies PTC No. 051-00015 issued on December 13, 1995, which is no longer effective as of the issuance date of this permit.

**Regulated Sources**

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

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	<u>Seed Handling</u> Receiving pit Receiving conveyor Receiving elevator Dirty seed distributor Dirty seed storage loadout conveyors Conditioning elevator Debearder Screener Graders Clean seed elevator Elevator to precision sizer Precision sizer Clean seed distributor Surge bin above precision sizer	<u>Central system fabric filter baghouse or equivalent</u> Manufacturer: MAC Model No. 120 MCF 255 Capture efficiency: 99.7% PM <sub>10</sub>
2	<u>Canola Processing</u> Gravity table separator Spiral separators Screening elevator Vibratory transfer conveyor Dust transfer screw conveyor Surge bin	<u>Canola processing fabric filter baghouse or equivalent</u> Manufacturer: Dustex Model No. 3630-10-14 Capture efficiency: 99.7% PM <sub>10</sub>
3	<u>Seed Treating</u> Load out distributor Aspirator Clean seed drag conveyor Clean seed elevators Two seed treatment system elevators Two treaters Seed packaging line	<u>Seed Treating Baghouse</u> Manufacturer: MAC Model No.: 144 MWT 40 Capture efficiency: 99.7% PM <sub>10</sub>

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**2. SMALL GRAINS SEED CONDITIONING**

**2.1 Process Description**

Small grains seed will be trucked to this facility where it will be cleaned, scalped, debearded, sized, and treated for future planting. The facility will have the capacity to handle a maximum of 2.5 million bushels of small grains seed per year. The seed storage capacity will be 192,000 bushels, which consists of 147,000 bushels of cleaned and treated seed, and 45,000 bushels of uncleaned seed storage.

**2.2 Emissions Control Description**

**Table 2.1 BAGHOUSE DESCRIPTIONS**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>
Seed handling	Central system fabric filter baghouse
Canola processing	Canola processing fabric filter dust control system

***Emissions Limits***

**2.3 Opacity Limit**

Emissions from the baghouse stacks, or any other stack, vent, or functionally equivalent opening associated with the baghouses, 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.

**2.4 Visible Fugitive Emissions**

Visible fugitive emissions shall not be observed traversing any property boundary for a period of periods aggregating more than three minutes in any 60 minute period. This visual determination is to be conducted using Method 22, 40 CFR Part 60, Appendix A.

***Operating Requirements***

**2.5 Small Grains Seed Throughput Limit**

The maximum small grains seed throughput shall not exceed 2.5 million bushels per any consecutive 12-month period.

**2.6 Fugitive Emissions**

Fugitive particulate emissions from the operation of this facility, including traffic on haul roads, traffic areas, and all small grains seed handling operations shall be reasonably controlled as required in IDAPA 58.01.01.650 and 651. Some of the reasonable precautions may include, but are not limited to, the following:

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- 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, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- 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, when practical, open bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

***Monitoring and Recordkeeping Requirements***

**2.7 Small Grains Seed Throughput Monitoring**

The permittee shall monitor and record the amount of small grains seed processed for that month and for the most recent 12-month period. The amounts shall be recorded as bushels to demonstrate compliance with Permit Condition 2.5 of this permit and shall be recorded in a log kept at the facility for the most recent two year period. The log shall be made available to DEQ representatives upon request.

**2.8 Operations and Maintenance Manual Requirements**

Within 60 days after permit issuance, the permittee shall have developed an O&M manual for the central system fabric filter baghouse and the canola processing fabric filter baghouse which describes the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouses. This manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

***Reporting Requirements***

**2.9 Certification of Documents**

All documents, including but not limited to, records, supporting information, or monitoring data submitted to DEQ 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 documents are true, accurate, and complete.

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**3. SMALL GRAINS SEED TREATING AND CLEANING**

**3.1 Process Description**

Cleaned seed is treated by two Gustafson treaters, each with a 1,000 bushel per hour capacity. Chemical solutions are applied in an enclosed spray chamber which is fed from premix tanks.

The seed is packaged in a packaging line consisting of an electric bagging system and equipment to stretch wrap palletized bags. Approximately 15% of the annual seed throughput will be bagged. The remainder will be shipped as bulk.

**3.2 Emissions Control Description**

**Table 3.1 BAGHOUSE DESCRIPTIONS**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>
Seed treating	Fabric filter baghouse

***Emissions Limits***

**3.3 Opacity Limit**

Emissions from the baghouse stack, or any other stack, vent, or functionally equivalent opening associated with the baghouse, 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.

**3.4 Visible Fugitive Emissions**

Visible fugitive emissions shall not be observed traversing any property boundary for a period of periods aggregating more than three minutes in any 60 minute period. This visual determination is to be conducted using Method 22, 40 CFR Part 60, Appendix A.

***Operating Requirements***

**3.5 Treated Seed Throughput Limit**

The maximum treated small grains seed throughput shall not exceed 2.5 million bushels per any consecutive 12-month period. Compliance with this limit is demonstrated by the monitoring and recordkeeping in Permit Condition 2.7.

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***Monitoring and Recordkeeping Requirements***

**3.6 Operations and Maintenance Manual Requirements**

Within 60 days after permit issuance, the permittee shall have developed an O&M manual for the seed treating baghouse which describes the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouse. This manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

***Reporting Requirements***

**3.7 Certification of Documents**

All documents, including but not limited to, records, supporting information, or monitoring data submitted to DEQ 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 documents are true, accurate, and complete.

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**4. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

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 and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
  - Initiation of Construction - Date
  - Completion/Cessation of Construction - Date
  - Actual Production Startup - Date
  - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. 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.

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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.

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.

7. 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.
8. In accordance with IDAPA 58.01.01.123, 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.