



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

601 Pole Line Road, Suite 2 • Twin Falls, Idaho 83301-3035 • (208) 736-2190

Dirk Kempthorne, Governor
C. Stephen Alfred, Director

October 13, 2000

CERTIFIED MAIL #7000 0520 0014 5096 7521

Mike Jansma
District Plant Manager
Cargill Inc.
PO Box 515
Rupert, ID 83350

RE: P-000414, Cargill Inc., Rupert
(Animal Feed Manufacturing Plant, PTC No. 067-00015)

Dear Mr. Jansma:

On August 14, 2000, the Idaho Department of Environmental Quality (DEQ) received an application from Cargill Inc. for a Permit to Construct (PTC) change of ownership for the Rupert animal feed manufacturing plant that was formerly owned by Koch Feed Products Company. On September 8, 2000, the application was determined complete. Based on review of the application and all applicable state and federal rules and regulations, DEQ finds that this project meets the provisions of IDAPA 58.01.01.200 (*Rules for the Control of Air Pollution in Idaho*). Enclosed is PTC No. 067-000015.

This permit does not release the permittee from compliance with all other applicable federal, state, local, or tribal laws, regulations, or ordinances.

Please pay particular attention to the reporting requirements contained in Paragraph E of the General Provisions section of the permit. This information is needed to properly track the progress of the permit. Please refer to the appropriate permit number when submitting reports required in the Reporting Requirements section of the permit.

You are strongly encouraged to request a meeting with DEQ to discuss the permit terms and requirements with which your facility must comply. Mr. Stephen VanZandt of the Twin Falls Regional Office will contact you regarding this meeting. DEQ strongly recommends that in addition to your facility's plant manager, your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions also attend the meeting.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 38706-1255, within thirty-five

Mike Jansma
Cargill, Inc.
October 13, 2000
Page 2

(35) days of the date of this decision. However, DEQ encourages you to contact the Air Quality Permit Program to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Stephen VanZandt, at (208) 736-2190.

Sincerely,



Doug Howard
Regional Administrator
Twin Falls Regional Office

DH/AJ/bm P190.5004 J:\XFER\AIR_PERM\TFRO\PTC\CARGIL\000414.PL

Enclosures

cc: DEQ State Office
Twin Falls Regional Office
L. Kral, EPA - Region 10

State of Idaho
Department of Environmental Quality

**PERMIT TO CONSTRUCT
AN AIR POLLUTION
EMITTING SOURCE**

PERMIT NUMBER

067 - 00015

AQCR

063

CLASS

B

SIC

2048

ZONE

12

UTM COORDINATE (km)

285 5 4723 6

1. PERMITTEE

Cargill Inc.

2. PROJECT

Animal Feed Manufacturing Plant

3. MAILING ADDRESS

PO Box 515

CITY

Rupert

STATE

Idaho

ZIP CODE

83350

4. SITE LOCATION COUNTY

Minidoka

NO. OF FULL-TIME EMPLOYEES

16

PROPERTY AREA AT SITE (Acreage)

0.3

5. PERSON TO CONTACT

Mike Jansma

TITLE

District Plant Manager

TELEPHONE

(208) 436-8815

6. EXACT PLANT LOCATION

35 North 100 East, Rupert, Idaho

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Animal Feed Manufacturing

8. GENERAL CONDITIONS

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 58.01.01.200, and pertains only to emissions of air contaminants that are regulated by the State of Idaho and to the sources specifically allowed to be constructed 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 Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees, assumes 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, 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 Department approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

DISCLAIMER: This document may serve as a Preliminary Inspection Finding Form for use by Department personnel in communicating your compliance status upon inspection. It does not constitute a final determination of compliance status with the Idaho Code or any rules promulgated, permits issued, or consent or judicial orders entered into pursuant to the law. The Idaho Department of Environmental Quality reserves the right to supplement this document with additional compliance determinations, and amend, change, or otherwise modify any compliance determination stated in this document. This document in no way restricts the State of Idaho Department of Environmental Quality from taking any action available under law to address past, present, or future violations of the laws administered by the agency.



ADMINISTRATOR, TWIN FALLS REGIONAL OFFICE
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE: October 13, 2000

Permittee: Cargill Inc.	PERMIT NUMBER									
Project: Animal Feed Manufacturing Plant	<table border="1" style="margin: auto;"> <tr> <td style="padding: 2px 10px;">0</td> <td style="padding: 2px 10px;">6</td> <td style="padding: 2px 10px;">7</td> <td style="padding: 2px 10px;">-</td> <td style="padding: 2px 10px;">0</td> <td style="padding: 2px 10px;">0</td> <td style="padding: 2px 10px;">0</td> <td style="padding: 2px 10px;">1</td> <td style="padding: 2px 10px;">5</td> </tr> </table>	0	6	7	-	0	0	0	1	5
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Location: Rupert, Idaho										
Source: Animal Feed Manufacturing Plant										

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EMISSION LIMITS

1.1 Particulate Matter PM Emission Limits

Emissions of particulate matter (PM) from the hammermill cyclone and pellet mill cooler cyclone shall not exceed any corresponding emission rate limit listed in Appendix A of this permit.

1.2 PM-10 Emission Limits

Emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM-10) from the hammermill cyclone and pellet mill cooler cyclone shall not exceed any corresponding emission rate limit listed in Appendix A of this permit.

1.3 Boiler PM Emissions

In accordance with IDAPA 58.01.01.675 (*Rules for the Control of Air Pollution in Idaho*), particulate matter (PM) emissions from the liquefied petroleum gas (propane)/natural gas fired boiler stack shall not exceed fifteen thousandths grains per dry standard cubic feet (0.015 gr/dscf) at three percent (3%) oxygen concentration.

1.4 Opacity Limit

Emissions emanating from any stack, vent, or other functionally-equivalent opening shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required in IDAPA 58.01.01.625.

1.5 Visible Emissions Limits at Property Boundary

Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. Visible emissions shall be determined as outlined in IDAPA 58.01.01.625.04 or a DEQ-approved alternative method.

2. OPERATING REQUIREMENTS

2.1 Maximum Throughout

Product load out at this facility shall be limited to a maximum of one hundred sixty-three thousand, six hundred eighty tons per any consecutive 12-month period (163,580 T/yr).

2.2 Boiler Fuel

The boiler shall not burn any fuel other than liquefied petroleum gas (propane) or natural gas.

2.3 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable,

Inspection Comments:

DATE:

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considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- 2.3.1 Use, where practical, of water or chemicals for controlling dust in the demolition of existing buildings or structures, construction operations, grading roads, or clearing lands;
- 2.3.2 Application, where practical, of asphalt, water, or suitable chemicals to cover dirt roads, material stockpiles, and other surfaces that can create dust;
- 2.3.3 Installation and use, where practical, of hoods, fans, 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);
- 2.3.4 Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
- 2.3.5 Paving roadways and maintaining roadways in a clean condition, where practical; and
- 2.3.6 Prompt removal of earth or other stored material from streets, where practical.

2.4 O & M Manual

Within sixty (60) days of issuance of this permit, the Permittee shall develop an Operations and Maintenance (O&M) Manual for all cyclone equipment. The manual shall describe the procedures that will be followed to comply with General Provision B and the air pollution equipment requirements contained in this permit. The manual shall be kept on site at all times and shall be made available to DEQ representatives upon request.

2.5 Rules for Control of Open Burning

The Permittee shall comply with the provisions of IDAPA 58.01.01.600-616 to protect public health and welfare from air pollutants resulting from open burning.

3. MONITORING REQUIREMENTS

3.1 Throughout

The Permittee shall monitor and record the quantity of product loaded out in tons per day (T/day) and tons per any consecutive 12-month period (T/yr).

Inspection Comments:

DATE:

Permittee:	Cargill Inc.	PERMIT NUMBER	
Project:	Animal Feed Manufacturing Plant	0	6
Location:	Rupert, Idaho	7	-
Source:	Animal Feed Manufacturing Plant	0	0
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4. REPORTING AND RECORD KEEPING REQUIREMENTS

4.1 The most recent two (2) years' compilation of data shall be kept on site and shall be made available to DEQ representatives upon request.

4.2 Certification of Documents

All documents including, but not limited to, application forms for Permits to Construct, monitoring data, supporting information, requests for confidential treatment, testing reports, and compliance certifications 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 document(s) are true, accurate, and complete.

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APPENDIX A

Cargill Inc. - Rupert Animal Feed Manufacturing Plant

ANNUAL (T/yr) EMISSION LIMITS^A

Source Description	PM ₁₀		PM	
	(lb/hr) ^B	(T/yr) ^C	(lb/hr) ^B	(T/yr) ^C
Hammermill Cyclone	1.07	2.74	2.14	5.48
Pellet Mill Cooler Cyclone	2.25	6.14	4.50	12.28

- ^A As determined by a pollutant-specific U.S. Environmental Protection Agency reference method, DEQ-approved alternative, or as determined by the DEQ's emission estimation methods used in the permit application analysis.
- ^B May be obtained by multiplying the hourly throughput in tons by EPA approved emission factors. The EPA approved AP-42 Fifth Edition emission factors for PM₁₀ that were used in the permit analysis are 0.0335 lbs/ton for the hammermill and 0.075 lbs/ton for the pellet mill. The EPA approved AP-42 Fifth Edition emission factors for PM that were used in the permit analysis are 0.067 lbs/ton for the hammermill and 0.15 lbs/ton for the pellet mill.
- ^C May be obtained by multiplying the pound per hour emission rate by the hours of operation that the emission units have operated over the last 12 month period and dividing by 2000 lb/ton.

Inspection Comments:

DATE:

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The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by DEQ, unless (1) the test demonstrates noncompliance, (2) a more restrictive operating limit is specified elsewhere in this permit, or (3) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- G. 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.

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