



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

May 18, 2012

Arvid Lyons, Manager
Lewis-Clark Terminal, Inc.
1534 3RD Ave N.
Lewiston, Idaho 83501

RE: Facility ID No. 069-00011, Lewis-Clark Terminal, Inc., Lewiston
Permit to Construct - Transfer of Ownership

Dear Mr. Lyons:

This letter acknowledges receipt on May 7, 2012, of a request for the transfer of ownership for Permit to Construct (PTC) Revision from CLD Pacific Grain, LLC to Lewis-Clark Terminal, Inc. Your transfer of ownership request is based on the following information.

Current Permittee Information

Permittee: CLD Pacific Grain, LLC
Facility Location: 1422 3RD Avenue N., Lewiston, Idaho 83501
Responsible Official: Gene Loffer
Phone Number: 503-243-1133
Person to Contact: Tom Riedner
Phone Number: 208-746-0102

Proposed Permittee Information

Permittee: Lewis-Clark Terminal, Inc.
Facility Location: 1534 3RD Avenue N., Lewiston, ID 83501
Responsible Official: Arvid Lyons
Phone Number: (208) 746-9685

The following table lists the permits subject to the requested transfer of ownership.

PERMITS SUBJECT TO THIS TRANSFER OF OWNERSHIP

Permit Type	Current Permit No.	Issuance Date	Project No. (If Assigned)	Revised Permit No.	Issuance Date	Project No. (If Assigned)
PTC	P-040205	September 22, 2004		P-2012.0027	May 18, 2012	61039

DEQ is only revising the cover page of the PTC. All other information in the permit remains the same.

Attached to this letter is revised PTC No. P-2012.0027, Project No. 61039, with the revised cover page reflecting the transfer of ownership. This PTC replaces PTC No. P-040205, issued September 22, 2004. The effective date of the transfer is the date listed on the cover page of the permit, which is the same as the date of this letter. DEQ recommends that you maintain a copy of this letter for your records.

This transfer does not release Lewis-Clark Terminal, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. If you have any questions, please contact Harbi Elshafei at 208-373-0502 or harbi.elshafei@deq.idaho.gov.

Sincerely,



Mike Simon
Stationary Source Program Manager
Air Quality Division

Attachment

Permit No. P-2012.0027 PROJ 61039

MS/HE

Air Quality
PERMIT TO CONSTRUCT

Permittee Lewis-Clark Terminal, Inc.

Permit Number P-2012.0027

Project ID 61039

Facility ID 069-00011

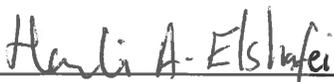
Facility Location 1422 3rd Avenue North
Lewiston, ID 83501

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 its 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; (g) 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. 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 22, 2004

Date Revised May 18, 2012



Harbi Elshafei, Permit Writer



Mike Simon, Stationary Source Manager

P-040205

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: ~~X-040406~~

Permittee: CLD Pacific Grain, LLC **Facility ID No.** **Date Issued:** September 22, 2004
Location: Lewiston, Idaho **069-00011**

1. PERMIT TO CONSTRUCT SCOPE

Purpose

This permit to construct (PTC) supersedes the following permits:

- PTC No. 069-00011, issued January 17, 2001
- PTC No. 069-00011, issued May 28, 2002

Regulated Sources

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

Table 1.1 EMISSION SOURCES

Permit Section	Source Description	Emissions Control(s)
2	East truck dump, tunnel belt, elevator leg, and large belt conveyor transfer point	Baghouse
3	Pea and lentil cleaner	Baghouse
4	Fugitive emissions from the west truck dump, barge unloading site, outdoor grain storage and handling, roads, and plant property	Reasonable controls

P-040305

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: X-040406

Permittee: CLD Pacific Grain, LLC **Facility ID No.** **Date Issued:** September 22, 2004
Location: Lewiston, Idaho **069-00011**

2. BAGHOUSE

Emission Limits

2.1 Emission Limits

Particulate matter (PM) emissions from the baghouse stack shall not exceed 0.20 grains per dry standard cubic foot (gr/dscf) per IDAPA 58.01.01.710.08.a.

2.2 Opacity Limit

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

Operating Requirements

2.3 Baghouse Pressure Drop

2.3.1 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 the manufacturer and Operation and Maintenance (O&M) Manual 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.

2.3.2 Within 60 days of the issuance of this permit, the permittee shall develop an annual operating and maintenance schedule for the baghouse to assure DEQ that this air pollution control equipment will be operated optimally. This schedule shall be kept onsite and shall be made available to DEQ representatives upon request.

2.4 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, 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 PM. Some of the reasonable precautions include, but are not limited to, the following:

- 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 lands.
- Instruction operations, the grading of roads, or the clearing of lands.
- 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.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: X-040406

Permittee: CLD Pacific Grain, LLC **Facility ID No.** **Date Issued:** September 22, 2004
Location: Lewiston, Idaho **069-00011**

- Covering, where practical, of 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**2.5 Operations and Maintenance Manual Requirements**

The permittee shall develop an O&M manual within 60 days of issuance of this permit for the baghouse describing the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the air pollution control device, including pressure drop. This manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

2.6 Baghouse Pressure Drop

The pressure drop across the baghouse shall be recorded at least once during each day while the baghouse is operating, and the pressure drop shall be compiled in a monthly report that includes a record of the hours of operation and the time the measurement is performed. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

Reporting Requirements**2.7 Certification of Documents**

All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, 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.

P-040205

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: X-040406

Permittee: CLD Pacific Grain, LLC	Facility ID No.: 069-00011	Date Issued: September 22, 2004
Location: Lewiston, Idaho		

3. PEA AND LENTIL CLEANER

Emission Limits

- 3.1 Particulate matter emission from the Delta 107 grain-cleaner baghouse stack shall not exceed 0.01 gr/dscf, as per the applicant's submittal.
- 3.2 Particulate matter emissions with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) from the Delta 107 grain-cleaner baghouse stack shall not exceed any corresponding emission rate limit listed in the appendix of this permit.
- 3.3 Visible emissions from the system baghouse stack shall not exceed 20% opacity for more than three minutes in any 60-minute period.

Operating Requirements

3.4 Baghouse Pressure Drop

- 3.4.1 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.
- 3.4.2 Within 60 days of the issuance of this permit, the permittee shall develop an annual operating and maintenance schedule for the baghouse to assure DEQ that this air pollution control equipment will be operated optimally. This schedule shall be kept onsite and shall be made available to DEQ representatives upon request.

3.5 Material Throughput

- 3.5.1 The process rate of material through the cleaner shall not exceed 41,600 tons per year (T/yr).
- 3.5.2 The process rate of material through the cleaner shall not exceed 480 tons per day (T/day).

Monitoring and Recordkeeping Requirements

3.6 Throughput

The permittee shall monitor the number of tons processed per calendar year and the number of tons processed per day when operating. This data shall be compiled in a monthly report. The permittee shall maintain these records onsite for the most recent two years and copies shall be made available to DEQ representatives upon request.

P-040205

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: ~~X-040486~~

Permittee:	CLD Pacific Grain, LLC	Facility ID No.	Date Issued:	September 22, 2004
Location:	Lewiston, Idaho	069-00011		

3.7 Baghouse Pressure Drop

The pressure drop across the baghouse shall be recorded at least once during each day while the baghouse is operating, and the pressure drop shall be compiled in a monthly report which includes a record of the hours of operation and the time the measurement is performed. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

Reporting Requirements

3.8 Certification of Documents

All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, 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.

P-040205

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: ~~X-040406~~

Permittee: CLD Pacific Grain, LLC	Facility ID No.	Date Issued: September 22, 2004
Location: Lewiston, Idaho	069-00011	

4. FUGITIVE EMISSIONS

Monitoring and Operating Requirements

4.1 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions, which might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- 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 lands.
- 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, where practical, of 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.

P-040205

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: X-040406

Permittee: CLD Pacific Grain, LLC **Facility ID No.** **Date Issued:** September 22, 2004
Location: Lewiston, Idaho **069-00011**

5. APPENDIX

CLD PACIFIC GRAIN, LLC

Emission Limits^a - Hourly (lb/hr) and Annual^b (T/yr)

Source Description	PM		PM-10	
	lb/hr	T/yr	lb/hr	T/yr
Delta 107 grain cleaner	0.025	0.078	0.025	0.078

- ^a As determined by a pollutant-specific U.S. EPA reference method, or DEQ-approved alternative, or as determined by DEQ's emission estimation methods used in this permit analysis.
- ^b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.
lb/hr = pounds per hour

P-040205

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: X-040406

Permittee: CLD Pacific Grain, LLC	Facility ID No.	Date Issued: September 22, 2004
Location: Lewiston, Idaho	069-00011	

6. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. 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:
 - 3.1 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.
 - 3.2 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 emissions 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 five 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 emissions testing is specified, the permittee must schedule such testing within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup. Such testing must strictly adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from DEQ. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to DEQ upon request.

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 emissions limit(s) set forth in this permit.

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.