



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor
C. Stephen Allred, Director

August 22, 2002

CERTIFIED MAIL No. 7000 0520 0016 0850 9092

Brad Duff
Dairy Feed Supply, Inc.
2584 Beryl Ave.
Twin Falls, ID 83301

RE: AIRS Facility No. 083-00086, Dairy Feed Supply Inc., Twin Falls
(Final Tier II Operating Permit and Permit to Construct)

Dear Mr. Duff:

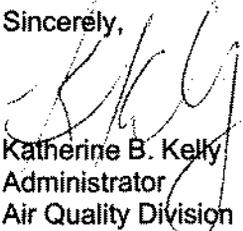
The Department of Environmental Quality (Department) is issuing Tier II Operating Permit and Permit to Construct No. 083-00086 for Dairy Feed Supply Inc. in accordance with the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400 - 470 and 58.01.01.200 - 228, respectively.

The enclosed permit is effective immediately, and is based on the information contained in your application and all relevant comments received during the public comment period.

Steve VanZandt of the Twin Falls Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. In addition to your facility's plant manager, the Department recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

You, as well as any other entity, may have the right to appeal this permit pursuant to IDAPA 58.01.23, *Rules of Administrative Procedure Before the Board of Environmental Quality*. A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255 within 35 days of the date of this decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Mike Simon at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,


Katherine B. Kelly
Administrator
Air Quality Division

KK/KB/sm

Project No. T2-010426

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Enclosures

cc: Steve VanZandt, Twin Falls Regional Office
Laurie Kral, EPA - Region 10

Kent Berry, EQM
Joan Lechtenberg, Air Quality Division



**Air Quality
TIER II OPERATING PERMIT
and
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO: 083-00086

AQCR: 64

CLASS: B

SIC: 2048

ZONE: 11

UTM COORDINATE (km):

1. PERMITTEE

Dairy Feed Supply, Inc.

2. PROJECT

Tier II Operating Permit and Permit to Construct

3. MAILING ADDRESS

2584 Beryl Ave.

CITY

Twin Falls

STATE

ID

ZIP

83301

4. FACILITY CONTACT

Brad Duff

TITLE

Manager

TELEPHONE

208-735-8955

5. RESPONSIBLE OFFICIAL

David Funk

TITLE

President

TELEPHONE

208-735-8955

6. EXACT PLANT LOCATION

2584 Beryl Ave., Twin Falls

COUNTY

Twin Falls

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Grain processing facility - animal feed production

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470. and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet 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 in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: AUGUST 22, 2002

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
CO	carbon monoxide
CFR	Code of Federal Regulations
Department	Department of Environmental Quality
EPA	Environmental Protection Agency
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu/hr	million British thermal units per hour
NO _x	nitrogen oxides
PM	particulate matter
PTE	potential to emit
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/hr	tons per year
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER: 083-00086Permittee: Dairy Feed Supply, Inc.
Location: Twin Falls, Idaho

Date Issued: AUGUST 22, 2002

1. PERMIT SCOPE***Purpose***

- 1.1 The purpose of this Tier II operating permit and Permit to Construct is to limit facility emissions and protect ambient air quality standards.
- 1.2 No previous air permits have been issued for this source.

Regulated Sources

- 1.3 Table 1.1 below lists all sources of emissions that are regulated in this permit.

Table 1.1 REGULATED SOURCES OF EMISSIONS

Permit Section	Source Description	Emissions Control(s)
2	Natural gas-fired boiler, Superior model 4-X-1024-S150, 7.5 MMBtu/hr Grain bins (2), 500,000 bushels each Product storage bins Truck loadout	None
3	Steam roller mills (2), Panhandle machine shop, rated at 12.7 T/hr Electric dryer/coolers (2)	Cyclones (2)

Permit Requirements Summary

- 1.4 Table 1.2 below summarizes the action items required in this permit.

Table 1.2 REPORTING, RECORDKEEPING and MONITORING SUMMARY

Requirement Description	Frequency	Permit Condition
Develop fugitive dust plan and submit for Department approval	Within 60 days of Permit issuance	2.2
Fugitive Complaint Log	As needed	2.3
Visible emission inspections of cyclones	Every calendar quarter	2.5
Maintaining on-site records	Five years	2.6

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Permittee: Dairy Feed Supply, Inc.
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2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

2.1 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.
- 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.

[IDAPA 58.01.01.650-651, 5/1/94]

2.2 Within 60 days of the issuance date of this permit, the permittee shall submit to the Department a fugitive dust management plan for approval. At a minimum, the plan shall identify all sources at the facility which may emit fugitive dust, appropriate dust control methods for each source, and recordkeeping procedures for documenting the frequency and methods used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[IDAPA 58.01.01.405.01, .07, 5/1/94]

2.3 Unless specified elsewhere in this permit, the permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall, at a minimum, include the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.405.02, .07, 5/1/94]

Visible Emissions

2.4 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 5/1/94]

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- 2.5 The permittee shall conduct a quarterly visible emission inspections of all cyclones at the facility during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each cyclone exhaust. If any visible emissions are present at the cyclone exhaust, the permittee shall either take appropriate corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each quarterly visible emission inspection and records of any maintenence conducted on the cyclones.

[IDAPA 58.01.01.405.01, 5/1/94]

Monitoring and Recordkeeping

- 2.6 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to: (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 and 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 to Department representatives upon request in either hard copy or electronic format.

[IDAPA 58.01.01.405.01, 5/1/94]

Reports and Certifications

- 2.7 Any reporting required by this permit, 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. Any reporting required by this permit shall be submitted to the following:

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office, Suite 2
601 Pole Line Road
Twin Falls, ID 83301

[IDAPA 58.01.01.405.01, 5/1/94]

Fuel-burning Equipment

- 2.8 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot of effluent gas corrected to 3% oxygen by volume for natural gas.

[IDAPA 58.01.01.677, 5/1/94]

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER: 083-00086

Permittee: Dairy Feed Supply, Inc.
Location: Twin Falls, Idaho

Date Issued: AUGUST 22, 2002

3. STEAM ROLLER MILLS (2) AND DRYER/COOLERS (2)

3.1 Process Description

This process consists of a two steam roller mills for steaming barley and corn to produce animal feed. The roller mills are followed by two electric dryer/cooler units to inhibit fermentation by adjusting moisture content.

3.2 Control Description

Emissions from each dryer/cooler are controlled by two cyclones with a flow of approximately 7,500 acfm each.

Emissions Limits

3.3 Emissions Limits

Particulate matter emissions from each cyclone shall not exceed 1.4 lb/hr or 4.4 T/yr in any 12-month period.
[IDAPA 58.01.01.211.01, 5/1/94]

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER: 083-00086

Permittee: Dairy Feed Supply, Inc.

Date Issued: AUGUST 22, 2002

Location: Twin Falls, Idaho

4. FACILITY-WIDE EMISSIONS INVENTORY

The following table provides a summary of the emissions inventory of the facility based on PTE for criteria air pollutants.

Table 4.1 EMISSIONS INVENTORY

Source Description	PM (T/yr)	CO (T/yr)	SO ₂ (T/yr)	NO _x (T/yr)	VOC (T/yr)
Natural gas boiler	0.23	2.51	0.02	2.99	0.20
Dryer/cooler #1 Cyclone	4.4				
Dryer/cooler #2 Cyclone	4.4				
Total	9.03	2.51	0.02	2.99	0.20

Permittee: Dairy Feed Supply, Inc.
Location: Twin Falls, Idaho

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5. GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission 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 and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's 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; and
 - 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 to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. 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.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be void.
8. The Director may require the permittee to develop a list of Operation and Maintenance Procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. 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.