

Statement of Basis

**Permit to Construct No. P-2019.0013
Project ID 62193**

**J D Heiskell & Co. - Twin Falls
Twin Falls, Idaho**

Facility ID 083-00086

Final

**April 18, 2019
Christina Boulay *CB*
Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

| | |
|-------------------|--|
| AAC | acceptable ambient concentrations |
| AACC | acceptable ambient concentrations for carcinogens |
| acfm | actual cubic feet per minute |
| ASTM | American Society for Testing and Materials |
| BACT | Best Available Control Technology |
| BMP | best management practices |
| Btu | British thermal units |
| CAA | Clean Air Act |
| CAM | Compliance Assurance Monitoring |
| CAS No. | Chemical Abstracts Service registry number |
| CBP | concrete batch plant |
| CEMS | continuous emission monitoring systems |
| cfm | cubic feet per minute |
| CFR | Code of Federal Regulations |
| CI | compression ignition |
| CMS | continuous monitoring systems |
| CO | carbon monoxide |
| CO ₂ | carbon dioxide |
| CO ₂ e | CO ₂ equivalent emissions |
| COMS | continuous opacity monitoring systems |
| DEQ | Department of Environmental Quality |
| dscf | dry standard cubic feet |
| EL | screening emission levels |
| EPA | U.S. Environmental Protection Agency |
| FEC | Facility Emissions Cap |
| GACT | Generally Available Control Technology |
| gph | gallons per hour |
| gpm | gallons per minute |
| gr | grains (1 lb = 7,000 grains) |
| HAP | hazardous air pollutants |
| HHV | higher heating value |
| HMA | hot mix asphalt |
| hp | horsepower |
| hr/yr | hours per consecutive 12 calendar month period |
| ICE | internal combustion engines |
| IDAPA | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| iwg | inches of water gauge |
| km | kilometers |
| lb/hr | pounds per hour |
| lb/qtr | pound per quarter |
| m | meters |
| MACT | Maximum Achievable Control Technology |
| mg/dscm | milligrams per dry standard cubic meter |
| MMBtu | million British thermal units |
| MMscf | million standard cubic feet |
| NAAQS | National Ambient Air Quality Standard |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NO ₂ | nitrogen dioxide |
| NO _x | nitrogen oxides |
| NSPS | New Source Performance Standards |

| | |
|-------------------|--|
| O&M | operation and maintenance |
| O ₂ | oxygen |
| PAH | polyaromatic hydrocarbons |
| PC | permit condition |
| PCB | polychlorinated biphenyl |
| PERF | Portable Equipment Relocation Form |
| PM | particulate matter |
| PM _{2.5} | particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers |
| PM ₁₀ | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers |
| POM | polycyclic organic matter |
| ppm | parts per million |
| ppmw | parts per million by weight |
| PSD | Prevention of Significant Deterioration |
| psig | pounds per square inch gauge |
| PTC | permit to construct |
| PTC/T2 | permit to construct and Tier II operating permit |
| PTE | potential to emit |
| PW | process weight rate |
| RAP | recycled asphalt pavement |
| RFO | reprocessed fuel oil |
| RICE | reciprocating internal combustion engines |
| <i>Rules</i> | <i>Rules for the Control of Air Pollution in Idaho</i> |
| scf | standard cubic feet |
| SCL | significant contribution limits |
| SIP | State Implementation Plan |
| SM | synthetic minor |
| SM80 | synthetic minor facility with emissions greater than or equal to 80% of a major source threshold |
| SO ₂ | sulfur dioxide |
| SO _x | sulfur oxides |
| T/day | tons per calendar day |
| T/hr | tons per hour |
| T/yr | tons per consecutive 12 calendar month period |
| T2 | Tier II operating permit |
| TAP | toxic air pollutants |
| TEQ | toxicity equivalent |
| T-RACT | Toxic Air Pollutant Reasonably Available Control Technology |
| ULSD | ultra-low sulfur diesel |
| U.S.C. | United States Code |
| VOC | volatile organic compounds |
| yd ³ | cubic yards |
| µg/m ³ | micrograms per cubic meter |

FACILITY INFORMATION

Description

Corn and barley are brought in by semi-trucks/trailer units and unloaded into two 200,000 bushel grain bins. From the bins, the grain is fed into a drum cleaner, a long cylindrical unit that rotates internally and has a capacity to clean 4,000 bushels per hour. There is one long metal box underneath the cleaner that collects dust and debris removed during cleaning.

After cleaning, the grain is elevated into a storage bin until it is fed into one of two steam roller mills. The gas-fired boiler that provides the steam has a rated capacity of 5.0 MMBtu/hr. As the product leaves the steam/roller process, it drops into one of two counter flow/cooler units. This inhibits fermentation of the product during storage and brings it to the correct moisture content. The exhaust from the counter flow/coolers goes to one of two Feed System International cyclones.

After the product leaves the counter flow/coolers, it is elevated to one of four storage bins located over the truck load-out area. The product retains some moisture, approximately 13-15%, as it is stored in the load-out bins and is loaded into the trucks, which deliver the product for local use. The load-out area is enclosed on two sides.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

| | |
|-----------------|--|
| August 22, 2002 | Permit No. 083-00086, Initial Tier II Operating Permit and Permit to Construct (PTC), Permit status (S) |
| October 7, 2013 | T2-2013.0052, Tier II Operating Permit name change to revise Tier II Operating Permit and Permit to Construct No. 083-00086, issued August 22, 2002, Permit status (A, but will become S upon issuance of this permit) |

Application Scope

This PTC is for a T2 conversion to PTC at an existing animal feed manufacturing facility.

The applicant has not proposed any modifications or changes to the permitted facility.

Application Chronology

| | |
|-------------------|--|
| February 26, 2019 | DEQ sent a notice of violation to the facility, which included notification that a PTC, or Renewal of the existing Tier II Operating Permit was required (NTC No. TFRO-NTC-2019.0001). |
| March 12, 2019 | DEQ received an application and an application fee. |
| March 18, 2019 | DEQ determined that the application was complete. |
| March 19, 2019 | DEQ made available the draft permit and statement of basis for peer and regional office review. |
| March 29, 2019 | DEQ made available the draft permit and statement of basis for applicant review. |
| April 15, 2019 | DEQ received the permit processing fee. |
| April 10, 2019 | DEQ issued the final permit and statement of basis. |

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

| Sources | Control Equipment |
|--|---|
| <u>Boiler:</u> Manufacturer: Superior Model: 4-X-1024-S150 Heat input rating: 5.0 MMBtu/hr Fuel: Natural Gas | None |
| <u>Grain Bins (2):</u> Capacity: 200,000 bushels each | None |
| <u>Product Storage Bins (4):</u> | None |
| <u>Truck Loadout:</u> | None |
| <u>Steam Roller Mills (2):</u> Manufacturer: Panhandle Machine Shop Rating: 12.7 T/hr each | None |
| <u>Counter Flow/Coolers (2):</u> Manufacturer: Custom | Cyclones (2) Capacity: 7,500 acfm each |

Potential to Emit

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for one natural gas-fired boiler, and two counter flow/cooler operations at the facility, Content Manager Record Number (2011AAG3728). Emissions estimates of criteria pollutant, HAP PTE were based on emission factors from AP-42, operation of 6,624 hours per year, 23 days per month, 24 hours per day, and process information specific to the facility for this proposed project.

The following table presents the Potential to Emit for criteria pollutants from all emissions units at the facility as determined by DEQ staff. See Content Manager Record Number (2011AAG3728) for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 2 POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

| Source | PM ₁₀ | SO ₂ | NO _x | CO | VOC |
|--|---------------------|---------------------|---------------------|---------------------|---------------------|
| | T/yr ^(a) |
| Natural Gas-Fired Boiler | 0.23 | 0.20 | 2.99 | 2.50 | 0.20 |
| Counter flow/Cooler #1 Cyclone | 4.40 | --- | --- | --- | --- |
| Counter flow/Cooler #2 Cyclone unit #3 | 4.40 | --- | --- | --- | --- |
| Totals | 9.03 | 0.20 | 2.99 | 2.50 | 0.20 |

a) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

Ambient Air Quality Impact Analyses

As presented in the Modeling Memo in Content Manager Record Number (2011AAG3728), the estimated emission rates of PM₁₀ from this project were below published DEQ modeling thresholds established in the State of Idaho Air Quality Modeling Guideline¹. Refer to the Emissions Inventories section for additional information concerning the emission inventories.

An ambient air quality impact analyses document has been crafted by DEQ based on a review of the modeling analysis submitted in the application. That document is part of the final permit package for this permitting action, as there is no emissions increase associated with this permitting action (see Content Manager Record Number (2011AAG3728)).

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Twin Falls County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

- A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.
- SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.
- SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.
- B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.
- UNK = Class is unknown.

¹ Criteria pollutant thresholds in Table 2, State of Idaho Guideline for Performing Air Quality Impact Analyses, Doc ID AQ-011, September 2013.

For All Other Pollutants:

- A = Use when permitted emissions of a pollutant are > 100 T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.
- B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 100 T/yr major source threshold.
- UNK = Class is unknown.

Table 3 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

| Pollutant | Uncontrolled PTE (T/yr) | Permitted PTE (T/yr) | Major Source Thresholds (T/yr) | AIRS/AFS Classification |
|-------------------|-------------------------|----------------------|--------------------------------|-------------------------|
| PM | <100 | 9.03 | 100 | B |
| PM ₁₀ | <100 | 9.03 | 100 | B |
| PM _{2.5} | <100 | 9.03 | 100 | B |
| SO ₂ | <100 | 0.02 | 100 | B |
| NO _x | <100 | 2.99 | 100 | B |
| CO | <100 | 2.51 | 100 | B |
| VOC | <100 | 0.20 | 100 | B |
| HAP (single) | <10 | <10 | 10 | B |
| Total HAPs | <25 | <25 | 25 | B |

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the existing emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 Visible Emissions

The sources of PM emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.4, and 2.11.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM₁₀, SO₂, NO_x, CO, VOC or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

Because the facility has a steam generating unit the following is an NSPS applicability analysis for the proposed equipment:

- 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. DEQ is delegated this Subpart.

§ 60.40c..... Applicability and delegation of authority.

Section (60.40c) states the requirements of this subpart apply to steam generating units for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h)

There is one natural gas-fired steam generating unit located at this facility which has a capacity of 5.0 MMBtu/hr. This capacity does not meet the minimum requirements of this Subpart. Subpart Dc is not applicable to the one natural gas-fired steam generating unit located at this facility.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT/GACT Applicability (40 CFR 63)

Because the facility prepares animal feed the following is a NESHAP applicability analysis for the proposed equipment:

- 40 CFR 63, Subpart DDDDDDD – National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing. DEQ is not delegated this Subpart.

§ 60.11619..... Applicability and delegation of authority.

Section (60.11619) states you are subject to this subpart if you own or operate a prepared feeds manufacturing facility that uses a material containing chromium or a material containing manganese and is an area source of emissions of hazardous air pollutants (HAP).

The facility operates a prepared feeds manufacturing facility with corn and barley. Material containing chromium and manganese are not used. The facility is an area source for HAPs. Subpart DDDDDDD is not applicable to this facility.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Existing Permit Condition 2.1 through 2.4

Fugitive Emissions

Revised Permit Condition 2.8, N/A, 2.13, and 2.14

Tier II Operating Permit T2-2013.0052 listed Facility-Wide Conditions under Section 2 and Fugitive Emissions under permit condition 2.1 through 2.4. The T2 conversion to PTC permit consolidates the fugitive emission requirements into one section with the animal feed process equipment. Therefore existing permit condition 2.1, 2.3, and 2.4 can now be found under permit condition 2.8, 2.13, and 2.14. Permit condition 2.2 has been removed as the facility does not utilize water or chemicals to prevent particulate matter from becoming airborne. The facility uses paved roads and reduced vehicle speeds.

Existing Permit Condition 2.5 and 2.6

Odors

Revised Permit Condition 2.7 and 10

Tier II Operating Permit T2-2013.0052 listed Odors under Facility-Wide Conditions in Section 2. The T2 conversion to PTC permit consolidates the Facility-Wide Condition requirements into one section with the animal feed process equipment. Therefore existing permit condition 2.5 and 2.6 can now be found under permit condition 2.7 and 2.10.

Existing Permit Condition 2.7 through 2.9

Visible Emissions

Revised Permit Condition 2.4, 2.11, and 2.12

Tier II Operating Permit T2-2013.0052 listed Visible Emissions under Facility-Wide Conditions in Section 2. The T2 conversion to PTC permit consolidates the Facility-Wide Condition requirements into one section with the animal feed process equipment. Therefore existing permit condition 2.7 through 2.9 can now be found under permit condition 2.4, 2.11, and 2.12.

Existing Permit Condition 2.10

Open Burning

Revised Permit Condition 2.15

Tier II Operating Permit T2-2013.0052 listed Open Burning under Facility-Wide Conditions in Section 2. The T2 conversion to PTC permit consolidates the Facility-Wide Condition requirements into one section with the animal feed process equipment. Therefore existing permit condition 2.10 can now be found under permit condition 2.15.

Existing Permit Condition 2.11

Reports and Certifications

Revised Permit Condition 2.16

Tier II Operating Permit T2-2013.0052 listed Reports and Certifications under Facility-Wide Conditions in Section 2. The T2 conversion to PTC permit consolidates the Facility-Wide Condition requirements into one section with the animal feed process equipment. Therefore existing permit condition 2.11 can now be found under permit condition 2.16.

Existing Permit Condition 2.12

Obligation to Comply

Revised Permit Condition N/A

T2 conversion to PTC permit eliminates this permit condition as it is specific to T2 permits.

Initial Permit Condition 2.5

Grain Throughput Limit

During the engineering analysis for the conversion from a T2 to PTC it was discovered that there were no material throughput limits included in the T2 that could be used to verify compliance with the emission limits listed for the one natural gas-fired boiler, and the two counter flow/cooler units.

During the engineering analysis for the conversion from a T2 to PTC it was discovered that there were no material throughput limits included in the T2 that could be used to verify compliance with the emission limits listed for the one natural gas-fired boiler, and the two counter flow/cooler units.

Content Manager Record Number 2011AAG3728 contains the modeling analysis used to verify compliance with NAAQS in regards to the PM₁₀ criteria pollutant. This analysis was completed using maximum quantity of grain dried at 12.7 T/hr, 304 T/day, 7,000 T/mo, 24 hr/day, and 23 days per month, for each steam roller mill.

Therefore a permit condition requiring the recordkeeping of the daily throughput for corn and barley combined multiplied by 24 hours for that day, can be used to verify compliance with the emission limits listed in the T2 and current PTC.

The General Permit Conditions from the current PTC Template were used.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.

APPENDIX A – EMISSIONS INVENTORIES



**Air Quality Permitting
Technical Memorandum**

Tier II Operating Permit and Permit to Construct No. 083-00086

**DAIRY FEED SUPPLY, INC.
TWIN FALLS, IDAHO**

**Prepared By: Kent Berry
Environmental Quality Management**

Project No. T2-010416

August 22, 2002

FINAL PERMIT

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

| | |
|------------------|--|
| acfm | actual cubic feet per minute |
| AFS | AIRS Facility Subsystem |
| AIRS | Aerometric Information Retrieval System |
| AQCR | Air Quality Control Region |
| CFR | Code of Federal Regulations |
| CO | carbon monoxide |
| DEQ | Department of Environmental Quality |
| dscf | dry standard cubic feet |
| EPA | Environmental Protection Agency |
| gr | grain (1 lb = 7,000 grains) |
| HAPS | hazardous air pollutants |
| IDAPA | A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| lb/hr | pound per hour |
| MACT | Maximum Available Control Technology |
| MMBtu/hr | million British thermal units per hour |
| NAAQS | National Ambient Air Quality Standards |
| NESHAP | National Emission Standards For Hazardous Air Pollutants |
| NO _x | nitrogen oxides |
| NSPS | New Source Performance Standards |
| PM | particulate matter |
| PM ₁₀ | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers |
| PSD | Prevention of Significant Deterioration |
| PTC | permit to construct |
| SIP | State Implementation Plan |
| SO ₂ | sulfur dioxide |
| T/hr | tons per hour |
| T/yr | tons per year |
| VOC | volatile organic compound |

PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01 Sections 400 through 470, *Rules for the Control of Air Pollution in Idaho* for Tier II Operating Permits and Sections 200 through 228 for Permits to Construct.

PROJECT DESCRIPTION

Dairy Feed Supply submitted a PTC application for their animal feed facility which was constructed without first obtaining a PTC. A combined PTC and Tier II operating permit is being issued instead.

The emissions sources at the facility are as follows:

Table 1. EMISSIONS SOURCES

| 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 tons per hour (T/hr) Electric dryer/coolers (2) | Cyclones |

FACILITY DESCRIPTION

Corn and barley are brought in by railcar and unloaded into two 500,000 bushel grain bins. From the bins the grain is fed into a drum cleaner, a long cylindrical unit that rotates internally and has a capacity to clean 4,000 bushels per hour. There are two large wooden boxes underneath the cleaner that collect dust and debris removed during cleaning.

After cleaning, the grain is elevated into a storage bin unit until it is fed into one of two steam roller mills. The gas-fired boiler that provides the steam has a rated capacity of 7.5 MMBtu/hr. As the product leaves the steamer/roller process, it drops into one of two electric dryer/cooler units. This inhibits fermentation of the product during storage and brings it to the correct moisture content. The exhaust from the dryer/coolers goes to one of two Feed Systems International cyclone air cleaners.

After the product leaves the dryer/coolers, it is elevated to one of several storage bins located over the truck load-out area. The product is still "wet" (13-15% moisture) as it is stored in the load-out bins and is loaded into the trucks, which deliver the product for local use. The load-out area is open (i.e., no sides or enclosure).

SUMMARY OF EVENTS

August 23, 2001 DEQ received a PTC application from Dairy Feed Supply.

February 8, 2002 The application was determined to be incomplete.

March 18, 2002 DEQ received a revised application, dated March 11, 2002, from Dairy Feed Supply.

May 7, 2002 DEQ issued a facility draft permit to Dairy Feed. No comments were received.

June 5, 2002 DEQ issued a proposed permit for public comment.

July 15, 2002 The public comment period closed. No comments were received.

DISCUSSION

1. Emissions Estimates

Potential criteria pollutant emissions from the gas-fired boiler are all less than 10% of the significant emission rates in IDAPA 58.01.01.006.92. The applicant estimated PM emissions from each of the cyclones as 1.4 lb/hr and 4.4 T/yr using AP-42, Table 9.9-1 for a grain column dryer with no control. Based on the flow rate provided, this is equivalent to approximately 0.02 gr/acfm and seems reasonable.

2. Modeling

The applicant provided SCREEN3 results for the cyclones and the boiler. The criteria pollutant concentrations, including background, were below the respective NAAQS. Emissions of cadmium and formaldehyde exceeded the emissions screening levels in IDAPA 58.01.01.585 and 586, but did not exceed the respective acceptable ambient concentrations. The SCREEN3 outputs are shown in the appendix.

3. Area Classification

Dairy Feed Supply is located in Twin Falls County, Idaho, in Air Quality Control Region 63. The area is classified attainment or unclassifiable for all federal and state criteria air pollutants.

4. Facility Classification

The facility is not a designated facility as defined in IDAPA 58.01.01.006.27. The AFS classification for this facility is "B" source because actual and potential emissions of all criteria pollutants are less than 100 T/yr.

5. Regulatory Review

This OP and PTC is subject to the following permitting requirements:

- | | |
|-------------------------------------|---|
| a. <u>IDAPA 58.01.01.401</u> | Tier II Operating Permit |
| b. <u>IDAPA 58.01.01.403</u> | Permit Requirements for Tier II Sources |
| c. <u>IDAPA 58.01.01.404.01(c)</u> | Opportunity for Public Comment |
| d. <u>IDAPA 58.01.01.404.04</u> | Authority to Revise or Renew Operating Permits |
| e. <u>IDAPA 58.01.01.406</u> | Obligation to Comply |
| f. <u>IDAPA 58.01.01.470</u> | Permit Application Fees for Tier II Permits |
| g. <u>IDAPA 58.01.01.625</u> | Visible Emission Limitation |
| h. <u>IDAPA 58.01.01.650</u> | General Rules for the Control of Fugitive Dust |
| i. <u>IDAPA 58.01.01.677</u> | Particulate Matter from Minor and Existing Fuel-burning Equipment |
| j. <u>IDAPA 58.01.01.200 et seq</u> | Requirements for Permits to Construct |

6. Permit Conditions

a. Emission Limits - Steam Roller Mills and Dryer/Coolers

Because PM emissions exceed 10% of the significant emission rates in IDAPA 58.01.01.006.92, the permit includes PM emission limits from the cyclones controlling these units.

b. Emission Limits - Natural Gas-fired Boiler

The boiler is subject to the 20% opacity limit in IDAPA 58.08.01.01.625 and 0.015 gr/dscf in IDAPA 58.01.01.677. These requirements are covered in the facility-wide conditions of the permit. No monitoring, recordkeeping, or reporting conditions are included for these requirements because of the extremely small likelihood of a violation for this minor combustion source.

7. AIRS

AIRS/AFS FACILITY-WIDE CLASSIFICATION^a DATA ENTRY FORM

| AIR PROGRAM | SIP | PSD | NSPS (Part 60) | NESHAP (Part 61) | MACT (Part 63) | TITLE V | AREA CLASSIFICATION |
|-------------------|-----|-----|--------------------|---------------------|-------------------|---------|---|
| POLLUTANT | | | | | | | A - Attainment U - Unclassifiable N - Nonattainment |
| SO ₂ | B | | | | | | A |
| NO _x | B | | | | | | A |
| CO | B | | | | | | U |
| PM ₁₀ | B | | | | | | U |
| PT (Particulate) | B | | | | | | A |
| VOC | B | | | | | | U |
| THAP (Total HAPs) | | | | | | | |
| | | | APPLICABLE SUBPART | | | | |

^a AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

FEES

Fees apply to this facility in accordance with IDAPA 58.01.01.470. The facility is subject to Tier II permit application fees of \$500 and has paid the amount in full.

RECOMMENDATIONS

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends DEQ issue a final Tier II operating permit and permit to construct to Dairy Feed Supply. An opportunity for public comment on the air quality aspects of the proposed operating permit was provided in accordance with IDAPA 58.01.01.404.01.c.

KB/MS:sm

G:\AIR PERMITS\T 2\DAIRY FEED SUPPLY\FINAL\DAIRY FEED FINAL TECH MEMO.DOC

cc: Steve VanZandt, Twin Falls Regional Office
Kent Berry, EQM
Joan Lechtenberg, Air Quality Division

Dairy Feed Supply
Inc.

APPENDIX
SCREEN3 OUTPUT FILES

02/14/02
15:42:25

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

dairy Feed supply Boiler

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = .126000
STACK HEIGHT (M) = 6.0960
STK INSIDE DIAM (M) = .5600
STK EXIT VELOCITY (M/S) = .6600
STK GAS EXIT TEMP (K) = 477.0000
AMBIENT AIR TEMP (K) = 293.0000
RECEPTOR HEIGHT (M) = .0000
URBAN/RURAL OPTION = RURAL
BUILDING HEIGHT (M) = .0000
MIN HORIZ BLDG DIM (M) = .0000
MAX HORIZ BLDG DIM (M) = .0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = .196 M**4/S**3; MON. FLUX = .021 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

| DIST (M) | CONC (UG/M**3) | STAB | U10M (M/S) | USTK (M/S) | MIX HT (M) | PLUME HT (M) | SIGMA Y (M) | SIGMA Z (M) | DWASH |
|----------|----------------|------|------------|------------|------------|--------------|-------------|-------------|-------|
| 1. | .0000 | 1 | 1.0 | 1.0 | 320.0 | 11.46 | .49 | .32 | NO |
| 100. | 136.4 | 3 | 1.5 | 1.5 | 480.0 | 9.11 | 12.52 | 7.54 | NO |
| 200. | 123.5 | 4 | 1.0 | 1.0 | 320.0 | 11.46 | 15.67 | 8.69 | NO |
| 300. | 93.21 | 4 | 1.0 | 1.0 | 320.0 | 11.46 | 22.68 | 12.23 | NO |
| 400. | 66.96 | 4 | 1.0 | 1.0 | 320.0 | 11.46 | 29.51 | 15.38 | NO |
| 500. | 49.63 | 4 | 1.0 | 1.0 | 320.0 | 11.46 | 36.19 | 18.39 | NO |
| 600. | 38.12 | 4 | 1.0 | 1.0 | 320.0 | 11.46 | 42.76 | 21.29 | NO |
| 700. | 34.44 | 6 | 1.0 | 1.0 | 10000.0 | 19.48 | 24.80 | 11.67 | NO |
| 800. | 34.72 | 6 | 1.0 | 1.0 | 10000.0 | 19.48 | 27.94 | 12.66 | NO |
| 900. | 34.10 | 6 | 1.0 | 1.0 | 10000.0 | 19.48 | 31.05 | 13.61 | NO |
| 1000. | 32.96 | 6 | 1.0 | 1.0 | 10000.0 | 19.48 | 34.13 | 14.54 | NO |

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:
83. 143.4 3 1.5 1.5 480.0 9.11 10.67 6.46 NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*L8

*** SUMMARY OF SCREEN MODEL RESULTS ***

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

Dairy Feed Supply Cyclone (2 Cyclones Combined as 1)

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = .126000
STACK HEIGHT (M) = 6.3754
STK INSIDE DIAM (M) = .3683
STK EXIT VELOCITY (M/S) = 33.2247
STK GAS EXIT TEMP (K) = 293.0000
AMBIENT AIR TEMP (K) = 293.0000
RECEPTOR HEIGHT (M) = .0000
URBAN/RURAL OPTION = RURAL
BUILDING HEIGHT (M) = .0000
MIN HORIZ BLDG DIM (M) = .0000
MAX HORIZ BLDG DIM (M) = .0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

STACK EXIT VELOCITY WAS CALCULATED FROM
VOLUME FLOW RATE = 7500.0000 (ACFM)

BOUY. FLUX = .000 M**4/S**3; MOM. FLUX = 37.434 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

| DIST (M) | CONC (UG/M**3) | STAB | U10M (M/S) | USTK (M/S) | MIX HT (M) | PLUME HT (M) | SIGMA Y (M) | SIGMA Z (M) | DWASH |
|-------------|-------------------|------|---------------|---------------|---------------|-----------------|----------------|----------------|-------|
| 1. | .4144E-10 | 6 | 1.0 | 1.0 | 10000.0 | 21.83 | 2.71 | 2.71 | NO |
| 100. | 18.48 | 3 | 8.0 | 8.0 | 2560.0 | 10.96 | 12.53 | 7.56 | NO |
| 200. | 17.09 | 4 | 5.0 | 5.0 | 1600.0 | 13.72 | 15.70 | 8.75 | NO |
| 300. | 16.26 | 5 | 5.0 | 5.0 | 10000.0 | 13.72 | 17.02 | 8.95 | NO |
| 400. | 21.58 | 5 | 1.0 | 1.0 | 10000.0 | 23.34 | 22.54 | 11.85 | NO |
| 500. | 24.95 | 5 | 1.0 | 1.0 | 10000.0 | 23.34 | 27.45 | 13.69 | NO |
| 600. | 25.73 | 5 | 1.0 | 1.0 | 10000.0 | 23.34 | 32.30 | 15.47 | NO |
| 700. | 25.05 | 5 | 1.0 | 1.0 | 10000.0 | 23.34 | 37.09 | 17.21 | NO |
| 800. | 26.01 | 6 | 1.0 | 1.0 | 10000.0 | 21.83 | 27.99 | 12.76 | NO |
| 900. | 26.49 | 6 | 1.0 | 1.0 | 10000.0 | 21.83 | 31.09 | 13.71 | NO |
| 1000. | 26.36 | 6 | 1.0 | 1.0 | 10000.0 | 21.83 | 34.17 | 14.64 | NO |

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:
924. 26.51 6 1.0 1.0 10000.0 21.83 31.86 13.95 NO

DWASH- MEANS NO CALC MADE (CONC = 0.0)
DWASH-NO MEANS NO BUILDING DOWNWASH USED

DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** SUMMARY OF SCREEN MODEL RESULTS ***

| CALCULATION PROCEDURE | MAX CONC (UG/M*3) | DIST TO MAX (M) | TERRAIN HT (M) |
|--------------------------|----------------------|--------------------|-------------------|
| SIMPLE TERRAIN | 26.51 | 924. | 0. |

** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **

Emission factor from AP-42, Table 9.9.1-1, grain drying, column dryer no control. This emission factor most closely represents the cyclones used in Dairy Feed's process; it is a conservative estimate because the AP-42 emission factor assumes no control, whereas cyclones are used in Dairy Feed's process.

Emission factor for PM-10 = 0.22 lb/ton.
Maximum production = 12.7 ton/hour, based on 7,000 ton/month capacity for January, 2002, 8 23 weekdays in January and 24 hours per day. Potential to emit = 2.8 lb/hr for 2 cyclones combined (or 1.4 lb/hr per cyclone).

At 2.8 lb/hr PM-10, hourly impact = 74.23 ug/m3.
24-hour = 29.7 ug/m³ Background = 86 Total impact = 115.7 ug/m³
Annual = 5.9 ug/m³ Background = 32.7 ug/m³ Total impact = 38.6 ug/m³

Both the 24-hour impact and the annual impact meet the NAAQS for PM-10 of 150 ug/m³ and 50 ug/m³, respectively.

APR. 11. 2002 7:33AM

EQM DURHAM

SCREEN Gas Boiler

REV. 4.0.

| CALCULATION PROCEDURE | MAX CONC (UG/M**3) | DIST TO MAX (M) | TERRAIN HT (M) |
|--------------------------|-----------------------|--------------------|-------------------|
| SIMPLE TERRAIN | 143.4 | 83. | 0. |

** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **

APPENDIX B – AMBIENT AIR QUALITY IMPACT ANALYSES

02/14/02
15:42:25

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

Dairy Feed supply Boiler

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = .125000
STACK HEIGHT (M) = 6.0960
STK INSIDE DIAM (M) = .5600
STK EXIT VELOCITY (M/S) = .6600
STK GAS EXIT TEMP (K) = 477.0000
AMBIENT AIR TEMP (K) = 293.0000
RECEPTOR HEIGHT (M) = .0000
URBAN/RURAL OPTION = RURAL
BUILDING HEIGHT (M) = .0000
MIN HORIZ BLDG DIM (M) = .0000
MAX HORIZ BLDG DIM (M) = .0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = .196 M**4/S**3; MON. FLUX = .021 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

| DIST (M) | CONC (UG/M**3) | STAB | U10M (M/S) | USTK (M/S) | MIX HT (M) | PLUME HT (M) | SIGMA Y (M) | SIGMA Z (M) | DWASH |
|----------|----------------|------|------------|------------|------------|--------------|-------------|-------------|-------|
| 1. | .0000 | 1 | 1.0 | 1.0 | 320.0 | 11.46 | .49 | .32 | NO |
| 100. | 136.4 | 3 | 1.5 | 1.5 | 480.0 | 9.11 | 12.52 | 7.54 | NO |
| 200. | 123.5 | 4 | 1.0 | 1.0 | 320.0 | 11.46 | 15.67 | 8.69 | NO |
| 300. | 93.21 | 4 | 1.0 | 1.0 | 320.0 | 11.46 | 22.68 | 12.23 | NO |
| 400. | 66.96 | 4 | 1.0 | 1.0 | 320.0 | 11.46 | 29.51 | 15.38 | NO |
| 500. | 49.63 | 4 | 1.0 | 1.0 | 320.0 | 11.46 | 36.19 | 18.39 | NO |
| 600. | 38.12 | 4 | 1.0 | 1.0 | 320.0 | 11.46 | 42.76 | 21.29 | NO |
| 700. | 34.44 | 6 | 1.0 | 1.0 | 10000.0 | 19.48 | 24.80 | 11.67 | NO |
| 800. | 34.72 | 6 | 1.0 | 1.0 | 10000.0 | 19.48 | 27.94 | 12.66 | NO |
| 900. | 34.10 | 6 | 1.0 | 1.0 | 10000.0 | 19.48 | 31.05 | 13.61 | NO |
| 1000. | 32.96 | 6 | 1.0 | 1.0 | 10000.0 | 19.48 | 34.13 | 14.54 | NO |

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:
83. 143.4 3 1.5 1.5 480.0 9.11 10.67 6.46 NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** SUMMARY OF SCREEN MODEL RESULTS ***

02/14/02
16:08:18

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

Dairy Feed Supply Cyclone (2 Cyclones Combined as 1)

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = .126000
STACK HEIGHT (M) = 6.3754
STK INSIDE DIAM (M) = .3683
STK EXIT VELOCITY (M/S) = 33.2247
STK GAS EXIT TEMP (K) = 293.0000
AMBIENT AIR TEMP (K) = 293.0000
RECEPTOR HEIGHT (M) = .0000
URBAN/RURAL OPTION = RURAL
BUILDING HEIGHT (M) = .0000
MIN HORIZ BLDG DIM (M) = .0000
MAX HORIZ BLDG DIM (M) = .0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

STACK EXIT VELOCITY WAS CALCULATED FROM
VOLUME FLOW RATE = 7500.0000 (ACFM)

BUOY. FLUX = .000 M**4/S**3; MOM. FLUX = 37.434 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

| DIST (M) | CONC (UG/M**3) | STAB | U10M (M/S) | USTK (M/S) | MIX HT (M) | PLUME HT (M) | SIGMA Y (M) | SIGMA Z (M) | DWASH |
|-------------|-------------------|------|---------------|---------------|---------------|-----------------|----------------|----------------|-------|
| 1. | .4144E-10 | 6 | 1.0 | 1.0 | 10000.0 | 21.83 | 2.71 | 2.71 | NO |
| 100. | 18.48 | 3 | 8.0 | 8.0 | 2560.0 | 10.96 | 12.53 | 7.96 | NO |
| 200. | 17.09 | 4 | 5.0 | 5.0 | 1600.0 | 13.72 | 15.70 | 8.75 | NO |
| 300. | 16.26 | 5 | 5.0 | 5.0 | 10000.0 | 13.72 | 17.02 | 8.95 | NO |
| 400. | 21.58 | 5 | 1.0 | 1.0 | 10000.0 | 23.34 | 22.54 | 11.85 | NO |
| 500. | 24.95 | 5 | 1.0 | 1.0 | 10000.0 | 23.34 | 27.45 | 13.69 | NO |
| 600. | 25.73 | 5 | 1.0 | 1.0 | 10000.0 | 23.34 | 32.30 | 15.47 | NO |
| 700. | 25.05 | 5 | 1.0 | 1.0 | 10000.0 | 23.34 | 37.09 | 17.21 | NO |
| 800. | 26.01 | 6 | 1.0 | 1.0 | 10000.0 | 21.83 | 27.99 | 12.76 | NO |
| 900. | 26.49 | 6 | 1.0 | 1.0 | 10000.0 | 21.83 | 31.09 | 13.71 | NO |
| 1000. | 26.36 | 6 | 1.0 | 1.0 | 10000.0 | 21.83 | 34.17 | 14.64 | NO |

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:
924. 26.51 6 1.0 1.0 10000.0 21.83 31.86 13.95 NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED

DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

 *** SUMMARY OF SCREEN MODEL RESULTS ***

| CALCULATION PROCEDURE | MAX CONC (UG/M**3) | DIST TO MAX (M) | TERRAIN HT (M) |
|--------------------------|-----------------------|--------------------|-------------------|
| SIMPLE TERRAIN | 26.51 | 924. | 0. |

 ** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **

Emission factor from AP-42, Table 9.9.1-1, grain drying, column dryer no control. This emission factor most closely represents the cyclones used in Dairy Feed's process; it is a conservative estimate because the AP-42 emission factor assumes no control, whereas cyclones are used in Dairy Feed's process.

Emission factor for PM-10 = 0.22 lb/ton.
 Maximum production = 12.7 ton/hour, based on 7,000 ton/month capacity for January, 2002, 8 23 weekdays in January and 24 hours per day. Potential to emit = 2.8 lb/hr for 2 cyclones combined (or 1.4 lb/hr per cyclone).

At 2.8 lb/hr, PM-10, hourly impact = 74.23 ug/m3.
 24-hour = 29.7 ug/m³ Background = 86 Total impact = 115.7 ug/m³
 Annual = 5.9 ug/m³ Background = 32.7 ug/m³ Total impact = 38.6 ug/m³

Both the 24-hour impact and the annual impact meet the NAAQS for PM-10 of 150 ug/m³ and 50 ug/m³, respectively.

APR. 11. 2002 7:33AM

EQM DURHAM

SCRIBEN Gas Boiler

NO. 400

| CALCULATION PROCEDURE | MAX CONC (UG/M**3) | DIST TO MAX (M) | TERRAIN HT (M) |
|--------------------------|-----------------------|--------------------|-------------------|
| SIMPLE TERRAIN | 143.4 | 83. | 0. |

** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **

APPENDIX C – FACILITY DRAFT COMMENTS

The following comments were received from the facility on April 4, 2019:

Permit:

Facility Comment: Page 3 Table 1.1 change the boiler from 7.5 MMBtu/hr to 5.0 MMBtu/hr, add quantity 4 to the “Product Storage Bins”, add “each” to the 12.7 T/hr limit for the Steam Roller Mills, change electric dryer to counter flow, in the permit and statement of basis.

DEQ Response: The boiler was changed from 7.5 MMBtu/hr to 5.0 MMBtu/hr because....., lower Btu’s results in a decrease of emissions. Quantity of “4” added to the, “Product Storage Bins”, the quantity of bins does not affect the throughput of the facility or emissions. “Each” was added to the 12.7 T/hr steam roller mill limit as this is consistent with the modeling analysis completed to determine compliance with NAAQS and the PM₁₀ criteria pollutant permit limit. Electric dryer was changed to counter flow to reflect the true operation on the cyclone cooler; this does not change the emissions generated from this source or the modeling analysis previously completed to determine permit limits.

Facility Comment: Page 4 Permit Condition 2.1 change railcar to semi-trucks/trailer units, and add, “two 200,000” to the bushel grain bin description, in the permit and statement of basis. Delete the word, “bushel” from the second sentence.

DEQ Response: Changed railcar to semi-trucks/trailer units, this does not change the emissions and reflects the current processes at the facility. “Two 200,000” added to the bushel grain bin description, this does not change emissions and is consistent with Table 1.1 regulated sources. “Bushel” was not deleted from the second sentence as this describes where the transfer point occurs.

Facility Comment: Page 5 change, “two wooden boxes” to, “one large metal box”. Revise the load-out area to reflect two sides enclosed instead of none.

DEQ Response: Wooden boxes changed to one large metal box, and the load-out area description was revised to reflect two enclosed sides, this does not change emissions and reflects the current processes at the facility.

APPENDIX D – PROCESSING FEE

PTC Processing Fee Calculation Worksheet

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: J D Heiskell & Co. - Twin Falls
 Address: 2584 Beryl Ave.
 City: Twin Falls
 State: Idaho
 Zip Code: 83303
 Facility Contact: Trent Becker
 Title: Northwest Region Environmental
 AIRS No.: 311119

N Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

Y Did this permit require engineering analysis? Y/N

N Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

| Emissions Inventory | | | |
|---------------------|----------------------------------|-----------------------------------|--------------------------------|
| Pollutant | Annual Emissions Increase (T/yr) | Annual Emissions Reduction (T/yr) | Annual Emissions Change (T/yr) |
| NO _x | 0.0 | 0 | 0.0 |
| SO ₂ | 0.0 | 0 | 0.0 |
| CO | 0.0 | 0 | 0.0 |
| PM10 | 0.0 | 0 | 0.0 |
| VOC | 0.0 | 0 | 0.0 |
| Total: | 0.0 | 0 | 0.0 |
| Fee Due | \$ 1,000.00 | | |

Comments:

