

Statement of Basis

**Permit to Construct No. P-2011.0143
Project ID 60973**

**WSI Caldwell Facility
Caldwell, Idaho**

Facility ID 027-00008

Final

**February 10, 2012
Kelli Wetzel *KW*
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
Btu	British thermal units
CAA	Clean Air Act
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
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
PC	permit condition
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
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
PW	process weight rate
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SM	synthetic minor
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
U.S.C.	United States Code
VOC	volatile organic compounds
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

J.R. Simplot Company Western Stockmen's (WSI), operates an existing animal feed and seed processing facility which is located in Caldwell, ID. WSI is comprised of two main operational functions. The first is the production of animal feed products for both bulk and packaged delivery. The second is the cleaning and processing of crop seed and bulk commodities. Within these main functional categories, WSI produces a range of individual products based on client needs. Feed and seed operations occur in two separate buildings on the WSI property and do not have operational overlap. All feed operation emissions are controlled by baghouses and all seed operation emissions are controlled by cyclones and one baghouse with the exception of fugitive emissions.

Feed Operations

The facility receives grain, corn, trace minerals and seed either through truck or rail car. The commodities are augured and elevator transferred into storage bins. Ingredients from the storage bins are weighted and mixed with additional additives. The finished ingredient mix is then either directly bagged, pressed into feed blocks, rolled and texturized, or pelletized. The final product is either bagged or transferred for bulk sales. This process is completed for both the main product line and the non-medicated product line.

Seed Operations

The facility receives raw seeds or grain by truck. The commodities are augured and elevator transferred into storage bins. The seeds are transferred to one of three seed cleaning towers. Once cleaned, the finished seeds are transferred to storage bins. The seeds are either bagged or transferred for bulk sales.

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).

May 1, 1990 PTC No. 0400-0008, Feed mill modification, Permit status (A, but will become S upon issuance of this permit)

Facility was formerly Kellogg Mills

Application Scope

This PTC is a modification of an existing PTC.

The applicant has proposed to:

- Update the permit conditions to reflect current operating conditions and processes
- Limit the material throughput
- Include 40 CFR 63, Subpart DDDDDDD requirements

Application Chronology

December 9, 2011	DEQ received an application and an application fee.
January 17 – February 1, 2012	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
January 6, 2012	DEQ determined that the application was complete.
January 17, 2012	DEQ made available the draft permit and statement of basis for peer and regional office review.
January 23, 2012	DEQ made available the draft permit and statement of basis for applicant review.
February 6, 2012	DEQ received the permit processing fee.
February 10, 2012	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment
Animal Feed Processing Operations		<u>Baghouse No. 1 for Mixing Process/Blocking Process/Middle Bagger (Mixer Paddle Baghouse)</u> Manufacturer: Torits/Donaldson Model No: 25-PJD-8 PM ₁₀ control efficiency: 99.9%
		<u>Baghouse No. 2 for Mixing Process/Blocking Process/Middle Bagger (Mixer Elevator Baghouse)</u> Manufacturer: Torits/Donaldson Model No: Not Available PM ₁₀ control efficiency: 99.9%
	1. Receiving and Grinding	<u>Baghouse No. 3 for Pellet Mills 1 and 2 (Internal Dust Control System)</u> Manufacturer: Torits/Donaldson Model No: 80HPW PM ₁₀ control efficiency: 99.9%
	2. Non-Medicated Mill Line	
	3. Rolled and Texturized Lines	
	4. Mixing Process/Blocking Process/Middle Bagger	<u>Baghouse No. 4 for Pellet Mills 3 and 4</u> Manufacturer: Torits/Donaldson Model No: 9PJD8 PM ₁₀ control efficiency: 99.9%
5. Pellet Mills 1, 2, 3, and 4		
6. Feed Mill Storage and Product Loadout	<u>Baghouse No. 5 for Grinder</u> Manufacturer: Torits/Donaldson Model No: 96PJD PM ₁₀ control efficiency: 99.9%	
	<u>Baghouse No. 6 for Rolled and Texturized Lines (Air System Baghouse)</u> Manufacturer: Torits/Donaldson Model No: 9PJD PM ₁₀ control efficiency: 99.9%	

Source ID No.	Sources	Control Equipment
Animal Feed Processing Operations	<ol style="list-style-type: none"> 1. Receiving and Grinding 2. Non-Medicated Mill Line 3. Rolled and Texturized Lines 4. Mixing Process/Blocking Process/Middle Bagger 5. Pellet Mills 1, 2, 3, and 4 6. Feed Mill Storage and Product Loadout 	<p><u>Baghouse No. 7 for Rolled and Texturized Lines (Roll Screen Baghouse)</u> Manufacturer: Torits/Donaldson Model No: 36HPT8 PM₁₀ control efficiency: 99.9%</p> <p><u>Baghouse No. 8 for Middle Bagger (Middle Bagger Baghouse)</u> Manufacturer: Torits/Donaldson Model No: 9PJD PM₁₀ control efficiency: 99.9%</p> <p><u>Baghouse No. 9 for New Side Receiving and Grinding</u> Manufacturer: Torits/Donaldson Model No: 9PJD PM₁₀ control efficiency: 99.9%</p> <p><u>Baghouse No. 10 for Old Side Receiving and Grinding</u> Manufacturer: Torits/Donaldson Model No: 9PJD8 PM₁₀ control efficiency: 99.9%</p> <p><u>Baghouse No. 11 for Non-Medicated Mill Line</u> Manufacturer: Dustex Model No: 3430-7-10SP PM₁₀ control efficiency: 99%</p> <p><u>Baghouse No. 12 for Rollo Mixer</u> Manufacturer: Torits/Donaldson Model No: 80CAB PM₁₀ control efficiency: 99.9%</p> <p><u>Baghouse No. 13 for Feed Mill Storage and Receiving</u> Manufacturer: Torits/Donaldson Model No: 9PJD8 PM₁₀ control efficiency: 99.9%</p> <p><u>Baghouse No. 14 for Product Loadout</u> Manufacturer: DCL Model No: F5140-11114-2 PM₁₀ control efficiency: 99%</p>
Seed Processing Operations	<ol style="list-style-type: none"> 1. Truck Unloading 2. Seed Conveying 3. Screen Line 1 4. Screen Line 2 5. Screen Line 3 6. Secondary Bagger 7. Truck Loading 	<p><u>Cyclone No. 1 for Screen Line 1</u> Manufacturer: Not Available Model No: Not available Type: Dry, Single Control efficiency: 85%</p> <p><u>Cyclone No. 2 for Screen Line 1</u> Manufacturer: Not Available Model No: Not Available Type: Dry, Single Control efficiency: 85%</p>

Source ID No.	Sources	Control Equipment
Seed Processing Operations	<ol style="list-style-type: none"> 1. Truck Unloading 2. Seed Conveying 3. Screen Line 1 4. Screen Line 2 5. Screen Line 3 6. Secondary Bagger 7. Truck Loading 	<p><u>Cyclone No. 3 for Screen Line 2</u> Manufacturer: Not Available Model No: Not Available Type: Dry, Single Control efficiency: 85%</p> <p><u>Baghouse No. 15 for Screen Line 3</u> Manufacturer: Buhler Model No: Not Available PM₁₀ control efficiency: 99%</p>
Boilers	<p><u>Boiler #1, #2, and #3</u> Fuel: Natural Gas Rated Capacity: 0.628 MMBtu/hr each</p>	None

Emissions Inventories

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 the animal feed and seed processing operations at the facility (see Appendix A) associated with this proposed project. Emissions estimates of criteria pollutant, hazardous air pollutants (HAP), and toxic air pollutants (TAP) were based on emission factors from AP-42, operation of 8,760 hours per year, and process information specific to the facility for this proposed project.

Pre-Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

The following table presents the pre-project potential to emit for all criteria and GHG pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 2 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO _{2e}	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Roll Mill 1	0.021	0.093	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Roll Mill 2	0.021	0.093	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pellet Mill 1	0.019	0.084	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pellet Mill 2	0.03	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bin 10 Baghouse	0.0058	0.026	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HEDS Baghouse	0.0005	0.0022	0.0005	0.0021	0.81	3.6	0.16	0.71	0.065	0.28	0.00	0.00
Boiler	0.041	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pre-Project Totals	0.14	0.61	0.0005	0.0021	0.81	3.60	0.16	0.71	0.065	0.28	0.00	0.00

a) Controlled average emission rate in pounds per hour is a daily average, based on the permitted daily operating schedule and daily limits.

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

Post Project Potential to Emit

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility's classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria and GHG pollutants from all emissions units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 3 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO ₂ e	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Bag House #1 or Bag House #12	0.012	0.053	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #2	0.012	0.053	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #3	0.05	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #4	0.0009	0.0039	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #5	0.0022	0.0098	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #6	0.043	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #7	0.043	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #8	0.0003	0.0012	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #9 or Bag House #10	0.012	0.053	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #11	0.016	0.072	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #13	0.012	0.053	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #14	0.027	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bag House #15	0.0002	0.0007	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cyclone #1	0.002	0.0077	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cyclone #2	0.0005	0.0021	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cyclone #3	0.005	0.023	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Boiler #1	0.006	0.027	0.0005	0.002	0.082	0.36	0.069	0.303	0.005	0.02	881	3859
Boiler #2	0.003	0.013	0.0002	0.001	0.041	0.18	0.034	0.15	0.002	0.0097	440	1929
Boiler #3	0.003	0.013	0.0002	0.001	0.041	0.18	0.034	0.15	0.002	0.0097	440	1929
Post Project Totals	0.25	1.11	0.0009	0.004	0.16	0.71	0.14	0.60	0.009	0.039	1,761	7,717

a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.

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

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

Table 4 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO ₂ e	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	0.14	0.61	0.0005	0.0021	0.81	3.6	0.16	0.71	0.065	0.28	0.00	0.00
Post Project Potential to Emit	0.25	1.11	0.0009	0.004	0.16	0.71	0.14	0.60	0.009	0.039	1761	7717
Changes in Potential to Emit	0.11	0.5	0.0004	0.002	-0.65	-2.89	-0.02	-0.11	-0.056	-0.241	1,761	7,717

Non-Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of non-carcinogenic TAP is provided in the following table.

Pre- and post-project, as well as the change in, non-carcinogenic TAP emissions are presented in the following table:

Table 5 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS

Non-Carcinogenic Toxic Air Pollutants	Pre-Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Barium	0.00E-03	7.16E-06	7.16E-06	0.033	No
Chromium	0.00E-03	2.28E-06	2.28E-06	0.033	No
Cobalt	0.00E-03	1.37E-07	1.37E-07	0.0033	No
Copper	0.00E-03	1.38E-06	1.38E-06	0.067	No
Hexane	0.00E-03	2.93E-03	2.93E-03	12	No
Manganese	0.00E-03	6.18E-07	6.18E-07	0.333	No
Mercury	0.00E-03	4.23E-07	4.23E-07	0.003	No
Molybdenum	0.00E-03	1.79E-06	1.79E-06	0.333	No
Naphthalene	0.00E-03	9.93E-07	9.93E-07	3.33	No
Pentane	0.00E-03	4.23E-03	4.23E-03	118	No
Selenium	0.00E-03	3.91E-08	3.91E-08	0.013	No
Toluene	0.00E-03	5.53E-06	5.53E-06	25	No
Zinc	0.00E-03	4.72E-05	4.72E-05	0.667	No

None of the PTEs for non-carcinogenic TAP were exceeded as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average carcinogenic screening ELs identified in IDAPA 58.01.01.585 were exceeded.

Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of carcinogenic TAP is provided in the following table.

Table 6 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR CARCINOGENIC TOXIC AIR POLLUTANTS

Carcinogenic Toxic Air Pollutants	Pre-Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Post Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Change in Annual Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Arsenic	0.00E-03	3.25E-07	3.25E-07	1.5E-06	No
Benzene	0.00E-03	3.42E-06	3.42E-06	8.0E-04	No
Beryllium	0.00E-03	1.95E-08	1.95E-08	2.8E-05	No
Cadmium	0.00E-03	1.79E-06	1.79E-06	3.7E-06	No
Formaldehyde	0.00E-03	1.22E-04	1.22E-04	5.1E-04	No
Nickel	0.00E-03	3.42E-06	3.42E-06	2.7E-05	No
Benzo(a)pyrene	0.00E-03	1.95E-09	1.95E-09	2.0E-06	No
Benz(a)anthracene	0.00E-03	2.93E-09	2.93E-09		
Benzo(b)fluoranthene	0.00E-03	2.93E-09	2.93E-09		
Benzo(k)fluoranthene	0.00E-03	2.93E-09	2.93E-09		
Chrysene	0.00E-03	2.93E-09	2.93E-09		
Dibenzo(a,h)anthracene	0.00E-03	1.95E-09	1.95E-09		
Indeno(1,2,3-cd)pyrene	0.00E-03	2.93E-09	2.93E-09		
Total PAHs ^a	0.00E-03	1.86E-08	1.86E-08	2.0E-06	No

a) Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. The total is compared to benzo(a)pyrene.

None of the PTEs for carcinogenic TAPs were exceeded as a result of this project. Therefore, modeling is not required for any carcinogenic TAP because none of the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Post Project HAP Emissions

The following table presents the post project potential to emit for HAP pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 7 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

Hazardous Air Pollutants	PTE (lb/hr)	PTE (T/yr)
Benzene	3.42E-07	1.50E-06
Formaldehyde	1.22E-04	5.34E-04
Hexane	2.93E-03	1.28E-02
Naphthalene	9.93E-07	4.35E-06
Toluene	5.53E-06	2.42E-05
Arsenic Compounds	3.25E-07	1.42E-06
Beryllium Compounds	1.95E-08	8.54E-08
Cadmium Compounds	1.79E-06	7.84E-06
Chromium Compounds	0.00E-00	0.00
Cobalt Compounds	1.37E-07	6.00E-07
Manganese Compounds	6.18E-07	2.71E-06
Mercury Compounds	4.23E-07	1.85E-06
Nickel Compounds	3.42E-06	1.50E-05
Selenium Compounds	3.91E-0	1.71E-07
Totals	3.07E-03	1.34E-02

Ambient Air Quality Impact Analyses

The estimated emission rates of PM₁₀, PM_{2.5}, SO₂, NO_x, CO, VOC, HAP, and TAP from this project were below applicable screening emission levels (EL) and published DEQ modeling thresholds established in IDAPA 58.01.01.585-586 and in the State of Idaho Air Quality Modeling Guideline¹. Refer to the Emissions Inventories section for additional information concerning the emission inventories.

The applicant has demonstrated pre-construction compliance to DEQ’s satisfaction that emissions from this facility will not cause or significantly contribute to a violation of any ambient air quality standard. The applicant has also demonstrated pre-construction compliance to DEQ’s satisfaction that the emissions increase due to this permitting action will not exceed any acceptable ambient concentration (AAC) or acceptable ambient concentration for carcinogens (AACC) for toxic air pollutants (TAP). No modeling was required for this PTC modification.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Canyon 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.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the modified 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.

¹ Criteria pollutant thresholds in Table 1, State of Idaho Air Quality Modeling Guideline, Doc ID AQ-011, rev. 1, December 31, 2002.

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 PM₁₀ emissions at this facility except for fugitive emissions are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 8 and 34.

Standards for New Sources (IDAPA 58.01.01.676)

IDAPA 58.01.01.676 Standards for New Sources

The fuel burning equipment located at this facility, with a maximum rated input of ten (10) million BTU per hour or more, are subject to a particulate matter limitation of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting gaseous fuels. Fuel-Burning Equipment is defined as any furnace, boiler, apparatus, stack and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer. This requirement is assured by Permit Condition 49.

Particulate Matter – New Equipment Process Weight Limitations (IDAPA 58.01.01.701)

IDAPA 58.01.01.701 Particulate Matter – New Equipment Process Weight Limitations

IDAPA 58.01.01.700 through 703 set PM emission limits for process equipment based on when the piece of equipment commenced operation and the piece of equipment’s process weight (PW) in pounds per hour (lb/hr). IDAPA 58.01.01.701 and IDAPA 58.01.01.702 establish PM emission limits for equipment that commenced operation on or after October 1, 1979 and for equipment operating prior to October 1, 1979, respectively.

For equipment that commenced operation on or after October 1, 1979, the PM allowable emission rate (E) is based on one of the following equations:

IDAPA 58.01.01.701.01.a: If PW is < 9,250 lb/hr; $E = 0.045 (PW)^{0.60}$

IDAPA 58.01.01.701.01.b: If PW is $\geq 9,250$ lb/hr; $E = 1.10 (PW)^{0.25}$

Table 8 provides the resulting PM allowable emission rates per IDAPA 58.01.01.701 based on process weight. As shown in Table 8, the controlled PM emission rates of all equipment are below the allowable PM emission rates of this Rule.

Table 8 PROCESS WEIGHT CALCULATIONS

Source	Process Weight (lb/hr)	Estimated PM Emission Rate (lb/hr)	Allowable PM Emission Rate (lb/hr)
Bag House #1 or Bag House #12	120435.12	0.012	19.38
Bag House #2	120435.12	0.012	19.38
Bag House #3	24087.02	0.05	13.70
Bag House #4	24087.02	0.0009	13.70
Bag House #5	120435.12	0.0022	19.38
Bag House #6	12043.51	0.043	10.90
Bag House #7	120435.12	0.043	19.38
Bag House #8	120435.12	0.0003	19.38
Bag House #9 or Bag House #10	120435.12	0.012	19.38
Bag House #11	24087.02	0.016	13.70
Bag House #13	120435.12	0.012	19.38
Bag House #14	120435.12	0.027	19.38
Bag House #15	0.49	0.0002	0.03
Cyclone #1	0.49	0.002	0.03
Cyclone #2	0.49	0.0005	0.03
Cyclone #3	0.49	0.005	0.03

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

IDAPA 58.01.01.301Requirement 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, PM_{2.5}, SO₂, NO_x, CO, and VOC or 10 tons per year for any one HAP or 25 tons per year for all HAPs 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 52.21Prevention 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)

40 CFR 60, Subpart DD Standards of Performance for Grain Elevators

In accordance with § 60.300, the provisions of this subpart apply to each affected facility, which commences construction, modification, or reconstruction after August 3, 1978, at any grain terminal elevator or any grain storage elevator. The affected facilities are each truck unloading station, truck loading station, barge and ship

unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations.

In accordance with § 60.301c, *grain terminal elevator* is defined as any grain elevator which has a permanent storage capacity of more than 88,100 m³ (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots. Since WSI manufactures animal food, the requirements of 40 CFR 60, Subpart DD do not apply.

NESHAP Applicability (40 CFR 61)

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

MACT Applicability (40 CFR 63)

The facility has proposed to operate as a minor source of HAP emissions, and is subject to the requirements of 40 CFR 63, Subpart DDDDDDD – National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing. Below is a breakdown of Subpart DDDDDDD.

40 CFR 63, Subpart DDDDDDDNational Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing

§ 63.11619 *Am I subject to this subpart?*

(a) *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).*

(b) *The provisions of this subpart apply to each new and existing prepared feeds manufacturing affected source. A prepared feeds manufacturing affected source is the collection of all equipment and activities necessary to produce animal feed from the point in the process where a material containing chromium or a material containing manganese is added, to the point where the finished animal feed product leaves the facility. This includes, but is not limited to, areas where materials containing chromium and manganese are stored, areas where materials containing chromium and manganese are temporarily stored prior to addition to the feed at the mixer, mixing and grinding processes, pelleting and pellet cooling processes, packing and bagging processes, crumblers and screens, bulk loading operations, and all conveyors and other equipment that transfer the feed materials throughout the manufacturing facility.*

(1) *A prepared feeds manufacturing affected source is existing if you commenced construction or reconstruction of the facility on or before July 27, 2009.*

(2) *A prepared feeds manufacturing affected source is new if you commenced construction or reconstruction of the facility after July 27, 2009.*

(3) *A collection of equipment and activities necessary to produce animal feed at a prepared feeds manufacturing facility becomes an affected source when you commence using a material containing chromium or a material containing manganese.*

(c) *An affected source is no longer subject to this subpart if the facility stops using materials containing chromium or manganese.*

The facility uses manganese in the prepared feed mix and therefore is an affected existing source since construction commenced before July 27, 2009.

§ 63.11620 *What are my compliance dates?*

(a) *If you own or operate an existing affected source, you must achieve compliance with the applicable provisions of this subpart by no later than January 5, 2012.*

The facility must be in compliance with the Subpart no later than January 5, 2012.

§ 63.11621
facilities?

What are the standards for new and existing prepared feeds manufacturing

You must comply with the management practices and standards in paragraphs (a) through (d) of this section at all times. For pelleting operations at prepared feeds manufacturing facilities with an average daily feed production level exceeding 50 tons per day, you must also comply with the requirements in paragraph (e) of this section at all times if you are a new source, and if you are an existing source, you must also comply with the requirements in paragraph (f) of this section at all times.

(a) In all areas of the affected source where materials containing chromium or manganese are stored, used, or handled, you must comply with the management practices in paragraphs (a)(1) and (2) of this section.

(1) You must perform housekeeping measures to minimize excess dust. These measures must include, but not be limited to, the practices specified in paragraphs (a)(1)(i) through (iii) of this section.

(i) You must use either an industrial vacuum system or manual sweeping to reduce the amount of dust;

(ii) At least once per month, you must remove dust from walls, ledges, and equipment using low pressure air or by other means, and then sweep or vacuum the area;

(iii) You must keep exterior doors in the immediate affected areas shut except during normal ingress and egress, as practicable. This paragraph (a)(1)(iii) does not apply to areas where finished product is stored in closed containers, and no other materials containing chromium or manganese are present.

(2) You must maintain and operate all process equipment in accordance with manufacturer's specifications and in a manner to minimize dust creation.

(b) You must store any raw materials containing chromium or manganese in closed containers.

(c) The mixer where materials containing chromium or manganese are added must be covered at all times when mixing is occurring, except when the materials are being added to the mixer. Materials containing chromium or manganese must be added to the mixer in a manner that minimizes emissions.

(d) For the bulk loading process where materials containing chromium or manganese are loaded into trucks or railcars, you must lessen fugitive emissions by reducing the distance between the loadout spout and the vehicle being loaded by either paragraph (d)(1) or (d)(2) of this section.

(1) Use a device of any kind at the bulk loadout spout that minimizes the distance to the vehicle being loaded.

(2) Use any other means to minimize the distance between the loadout spout and the vehicle being loaded.

The facility must comply with the management practices and standards listed in paragraphs (a) through (d) no later than January 5, 2012.

§ 63.11622

What are the monitoring requirements for new and existing sources?

(a) If you own or operate an affected source required by §63.11621(d) to use a device at the loadout end of a bulk loader that reduces fugitive emissions from a bulk loading process, you must perform monthly inspections of each device to ensure it is in proper working condition. You must record the results of these inspections in accordance with §63.11624(c)(4) of this subpart.

The facility must perform monthly inspections of each device and record the results.

§ 63.11623

What are the testing requirements?

(a) If you are demonstrating that the cyclone required by §63.11621(e) is designed to reduce emissions of particulate matter by 95 percent or greater by the performance test option in §63.11621(e)(1)(iii), you must conduct a test in accordance with paragraph (b) of this section and calculate the percent reduction in accordance with paragraph (c) of this section.

The facility is not subject to §63.11621(e). Therefore there are no testing requirements.

(a) Notifications. You must submit the notifications identified in paragraphs (a)(1) and (2) of this section.

(1) Initial Notification. If you are the owner of an affected source you must submit an Initial Notification no later than May 5, 2010, or 120 days after you become subject to this subpart, whichever is later. The Initial Notification must include the information specified in paragraphs (a)(1)(i) through (iv) of this section.

(i) The name, address, phone number and e-mail address of the owner and operator;

(ii) The address (physical location) of the affected source;

(iii) An identification of the relevant standard (i.e., this subpart); and

(iv) A brief description of the operation.

(2) Notification of Compliance Status. If you are the owner of an existing affected source, you must submit a Notification of Compliance Status in accordance with §63.9(h) of the General Provisions on or before May 4, 2012. If you are the owner or operator of a new affected source, you must submit a Notification of Compliance Status within 120 days of initial startup, or by October 18, 2010, whichever is later. If you own or operate an affected source that becomes an affected source in accordance with §63.11619(b)(3) after the applicable compliance date in §63.11620 (a) or (b), you must submit a Notification of Compliance Status within 120 days of the date that you commence using materials containing manganese or chromium. This Notification of Compliance Status must include the information specified in paragraphs (a)(2)(i) through (iv) of this section.

(i) Your company's name and address;

(ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;

(v) If you own or operate an affected source that is not subject to a requirement in §63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations because your initial average daily feed production level was 50 tpd or less, documentation of your initial daily pelleting production level determination.

(b) Annual compliance certification report. You must, by March 1 of each year, prepare an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (b)(6) of this section. You must submit the report if you had any instance described by paragraph (b)(3) or (b)(4) of this section.

(1) Your company's name and address.

(2) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.

(3) If the source is not in compliance, include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken.

(c) Records. You must maintain the records specified in paragraphs (c)(1) through (6) of this section in accordance with paragraphs (c)(7) through (9) of this section.

(1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted to comply with this subpart in accordance with paragraph (a) of this section, and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

(2) You must keep a copy of each Annual Compliance Certification prepared in accordance with paragraph (b) of this section.

(3) For each device used to comply with the requirements in §63.11621(d), you must keep the records of all inspections including the information identified in paragraphs (c)(3)(i) through (iii) of this section.

(i) The date, place, and time of each inspection;

(ii) Person performing the inspection;

(iii) Results of the inspection, including the date, time, and duration of the corrective action period from the time the inspection indicated a problem to the time of the indication that the device was replaced or restored to operation.

(7) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1).

(8) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each recorded action.

(9) You must keep each record onsite for at least 2 years after the date of each recorded action according to §63.10(b)(1). You may keep the records offsite for the remaining 3 years.

The facility must submit an Initial Notification no later than 120 days after becoming subject to the Subpart, May 5, 2010. The facility must also submit a Notification of Compliance Status on or before May 4, 2012. An annual compliance certification report must be prepared by March 1 of each year. Records must be kept onsite for 2 years and may be kept onsite or offsite for the remaining 3 years.

Permit Conditions Review

This section describes only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action. The process and control equipment at WSI have changed significantly enough that all existing permit conditions have either been deleted or modified.

Permit Conditions 5 and 6

These permit conditions provide a description of the regulated sources and the control devices in use for the animal feed processing operations.

Permit Condition 7

This permit condition establishes hourly and annual PM₁₀ emissions limits from the animal feed processing operation. These limits were placed on the permit because the permittee requested throughput limits and used them to establish emissions. Compliance with the Emissions Limit Permit Condition is demonstrated by complying with operating requirements, throughput limits, operation of control devices, and monitoring and recordkeeping requirements specified in the permit.

Permit Condition 8

This permit condition establishes a 20% opacity limit for the animal feed processing operation stacks, vents, or functionally equivalent openings associated with the animal feed processing operation.

Permit Condition 9

This permit condition establishes an annual throughput limit for animal feed processing operations in Pellet Mills 1, 2, 3, and 4 and the Non-Medicated Feed Line. These requirements were placed on the permit because the permittee specified these throughputs for the animal feed processing operation in the permit application and used them to establish emissions.

Permit Condition 10

This permit condition establishes an annual throughput limit for raw commodity receiving. These requirements were placed on the permit because the permittee specified these throughputs for raw commodity receiving in the permit application and used them to establish emissions.

Permit Condition 11

This permit condition requires that the permittee reasonably control fugitive emissions.

Permit Condition 12

This permit condition requires that the permittee develop a Baghouse Procedures document for the inspection and operation of the baghouses which controls emissions from the animal feed processing operation. This requirement is based upon DEQ internal guidance for establishing permit conditions for baghouses.

Permit Condition 13

This permit condition requires that the permittee shall maintain and operate baghouses Nos. 1 through 14 according to manufacturer and the Baghouse Procedures document.

Permit Condition 14

This permit condition requires that the permittee operate the animal feed processing baghouses to control PM and PM₁₀ emissions as proposed by the Applicant.

Permit Condition 15

This permit condition requires that the permittee monitor and record the amount of animal feed through Pellet Mills 1, 2, 3, and 4 on a monthly and annual basis. This requirement was placed in the permit because PM₁₀ emissions from the animal feed processing operation are based upon this annual throughput.

Permit Condition 16

This permit condition requires that the permittee monitor and record the amount of bulk commodities received at the facility on a monthly and annual basis. This requirement was placed in the permit because PM₁₀ emissions from the animal feed processing operation are based upon this annual throughput.

Permit Condition 17

This permit condition requires that the permittee maintain delivery records/receipts of raw commodities received at the facility. This requirement was placed in the permit to ensure compliance with the annual throughput requirements for the facility.

Permit Condition 18

This permit condition requires that the facility conduct a facility-wide inspection of fugitive dust emissions. This requirement is based upon DEQ internal guidance for establishing permit conditions for fugitive dust control.

Permit Condition 19

This permit condition requires that the facility conduct a facility-wide inspection of visible emissions. This requirement is based upon DEQ internal guidance for establishing permit conditions for visible emissions.

Permit Conditions 20 through 30

These permit conditions are conditions established to comply with the federal requirements of 40 CFR 63 Subpart DDDDDDD.

Permit Conditions 31 and 32

These permit conditions provide a description of the regulated sources and the control devices in use for the seed processing operations.

Permit Condition 33

This permit condition establishes hourly and annual PM₁₀ emissions limits from the seed processing operation. These limits were placed on the permit because the permittee requested throughput limits and used them to establish emissions. Compliance with the Emissions Limits Permit Condition is demonstrated by complying with operating requirements, throughput limits, operation of control devices, and monitoring and recordkeeping requirements specified in the permit.

Permit Condition 34

This permit condition establishes a 20% opacity limit for the seed processing operation stacks, vents, or functionally equivalent openings associated with the seed processing operation.

Permit Condition 35

This permit condition establishes an annual throughput limit for raw commodity receiving. These requirements were placed on the permit because the permittee specified this throughput for raw commodity receiving in the permit application and used them to establish emissions.

Permit Condition 36

This permit condition requires that the permittee reasonably control fugitive emissions.

Permit Condition 37

This permit condition requires that the permittee develop a Baghouse Procedures document for the inspection and operation of the baghouses which controls emissions from the seed processing operation. This requirement is based upon DEQ internal guidance for establishing permit conditions for baghouses.

Permit Condition 38

This permit condition requires that the permittee shall maintain and operate baghouse No. 15 according to manufacturer and the Baghouse Procedures document.

Permit Condition 39

This permit condition requires that the permittee operate the seed processing baghouse to control PM and PM₁₀ emissions as proposed by the Applicant.

Permit Condition 40

This permit condition requires that the permittee operate Cyclone Nos. 1 through 3 to control PM and PM₁₀ emissions as proposed by the Applicant.

Permit Condition 41

This permit condition requires that the permittee maintain and operate Cyclone Nos. 1 through 3. This requirement was placed in the permit to ensure that the cyclones are operated at the manufacturers recommendations so that PM₁₀ emissions are controlled.

Permit Condition 42

This permit condition requires that the permittee monitor and record the amount of bulk commodities received at the facility on a monthly and annual basis. This requirement was placed in the permit because PM₁₀ emissions from the seed processing operation are based upon this annual throughput.

Permit Condition 43

This permit condition requires that the permittee maintain delivery records/receipts of raw commodities received at the facility. This requirement was placed in the permit to ensure compliance with the annual throughput requirements for the facility.

Permit Condition 44

This permit condition requires that the permittee inspect Cyclones Nos. 1 through 3 on a monthly basis. This requirement was placed in the permit to ensure that the cyclones are operated at the manufacturers recommendations so that PM₁₀ emissions are controlled.

Permit Condition 45

This permit condition requires that the facility conduct a facility-wide inspection of fugitive dust emissions. This requirement is based upon DEQ internal guidance for establishing permit conditions for fugitive dust control.

Permit Condition 46

Permit Condition 46

This permit condition requires that the facility conduct a facility-wide inspection of visible emissions. This requirement is based upon DEQ internal guidance for establishing permit conditions for visible emissions.

Permit Conditions 47 and 48

These permit conditions provide a description of the boilers and the control devices in use.

Permit Condition 49

This permit condition establishes the particulate matter emission limitation in accordance with IDAPA 58.01.01.676.

Permit Condition 50

This permit condition requires that Boilers Nos. 1 through 3 shall only use natural gas. This requirement was placed in the permit because emissions from the boilers are based upon using exclusively natural gas.

Permit Condition 51

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

Permit Condition 52

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

Permit Condition 53

The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

Permit Condition 54

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

Permit Condition 55

The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

Permit Condition 56

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

Permit Condition 57

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

Permit Condition 58

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

Permit Condition 59

The performance test report provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

Permit Condition 60

The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

Permit Condition 61

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

Permit Condition 62

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

Permit Condition 63

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

Permit Condition 64

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

Permit Condition 65

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

Permit Condition 66

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

APPENDIX A – EMISSIONS INVENTORIES

Non-Medicated Mill

Total Throughput =
(Assume 10% Fines)

62000 tons/year
24087.02 (lb/hr)
Process Weight

Equipment	Throughput (tons)	Emission Source Category	Emission Factor (lb/ton)			Total Emissions (TPY)		
			PM	PM-10	PM-2.5	PM	PM-10	PM-2.5
Baghouse - Assume 99% control	Non-Med Baghouse (BH-11)							
Truck Receiving Elevator L-1	62000	Grain receiving ^{1,5}	0.017	0.0025	0.0025	5.27E-03	7.75E-04	7.75E-04
Auger C-1	62000	Headhouse and grain handling ²	0.061	0.034	0.0058	1.89E-02	1.05E-02	1.80E-03
Non-Med Mixer	62000	Mixer ³	0.061	0.034	0.0058	1.89E-02	1.05E-02	1.80E-03
Drag Conveyor C-11	62000	Headhouse and grain handling ²	0.061	0.034	0.0058	1.89E-02	1.05E-02	1.80E-03
Non-Med Screener	62000	Grain cleaning ^{2,4}	0.5	0.125	0.02	1.55E-01	3.88E-02	6.20E-03
Elevator L-5 Fines Return	6200	Headhouse and grain handling ²	0.061	0.034	0.0058	1.89E-03	1.05E-03	1.80E-04
Non-Med Bagger	62000	Feed shipping ^{1,5}	0.0033	0.0008	0.0008	1.02E-03	2.48E-04	2.48E-04
						2.20E-01	7.24E-02	1.28E-02

1. AP-42 Table 9.9.1-2
2. AP-42 Table 9.9.1-1
3. AP-42 Table 9.9.1-2 lists this emission factor as ND. Use Grain Handling emission factor to approximate.
4. Uncontrolled emission factor calculated by using the given control efficiency for a cyclone (85%) and back calculating
5. No emission factor for PM2.5 given in AP-42. Assume PM2.5 emission factor equal to PM10 emission factor.

Receiving and Grinding**

Total Output =
(Assume 10% Fines)

310,000 tons²

Process Weight
120435.12 (lb/hr)

Equipment	Throughput (tons)	Emission Source Category	Emission Factor (lb/ton)			Total Emissions (tons)		
			PM	PM-10	PM-2.5	PM	PM-10	PM-2.5
Baghouse - Assume 99% control	Old Side Baghouse (BH-10) or New Side Baghouse (BH-9)							
Elevator L-1 Feeding Distributor E-1	310,000	Headhouse and grain handling ¹	0.061	0.034	0.0058	9.46E-02	5.27E-02	8.99E-03
Truck/Rail Receiving (Non Controlled)	310,000	Grain receiving ¹	0.017	0.0025	0.0025	2.64E+00	3.88E-01	3.88E-01
						2.73E+00	4.40E-01	3.96E-01

1. AP-42 Table 9.9.1-1

2. Throughput assumed to be equal to all commodities needed for Max operation of pellet mills (4x62k tons/mill)

** All receiving assumed to go through Old Side as emissions would be consistent from old or new side processing.

Transfer Commodity's to Feed Mill Storage and Product Loadout

Total Output =
(Assume 10% Fines)

Process Weight
310,000 tons 120435.12 (lb/hr)
(To New Side Feed Mill Ingredient Bins)

Equipment	Throughput (tons)	Emission Source Category	Emission Factor (lb/ton)			Total Emissions (tons)		
			PM	PM-10	PM-2.5	PM	PM-10	PM-2.5
Baghouse - Assume 99% control		Trans Comm Baghouse (BH-13)						
Elevator L-44	310,000	Headhouse and grain handling ¹	0.061	0.034	0.0058	9.46E-02	5.27E-02	8.99E-03
Baghouse - Assume no controls if new loadout used (BH-14) would reduce emissions								
Product Truck Loadout	310,000	Feed shipping ^{2,3}	0.0033	0.0008	0.0008	5.12E-01	1.24E-01	1.24E-01
						6.06E-01	1.77E-01	1.33E-01

1. AP-42 Table 9.9.1-1
2. AP-42 Table 9.9.1-2
3. No emission factor for PM2.5 given in AP-42. Assume PM2.5 emission factor equal to PM10 emission factor.

Rolled/Texturized

Total Output =
(Assume 10% Fines)

310000 tons/yr

Process Weight
120435.12 (lb/hr)

Equipment	Throughput (tons)	Emission Source Category	Emission Factor (lb/ton)			Total Emissions (tons)		
			PM	PM-10	PM-2.5	PM	PM-10	PM-2.5
Baghouse - Assume 99% control	Rolled Baghouse(BH-5)							
Corn Storage Bin #4	62000	Storage bin (vent) ¹	0.025	0.0063	0.0011	7.75E-03	1.95E-03	3.41E-04
Barley Storage Bin #3	248000	Storage bin (vent) ¹	0.025	0.0063	0.0011	3.10E-02	7.81E-03	1.36E-03
Baghouse - Assume 99% control	Air System Baghouse (BH-6)							
Air separator/cooler (fines)	31000	Pellet cooler ^{2,3,4}	2.4	1.2	1.2	3.72E-01	1.86E-01	1.86E-01
Baghouse - Assume 99% control	Roll Screen Baghouse(BH-7)							
Roll/Texture Screener	310000	Grain cleaning ^{1,3}	0.5	0.125	0.02	7.75E-01	1.94E-01	3.10E-02
						1.19E+00	3.90E-01	2.19E-01

1. AP-42 Table 9.9.1-1

2. AP-42 Table 9.9.1-2

3. Uncontrolled emission factor calculated by using the given control efficiency for a cyclone (85%) and back calculating

4. No emission factor for PM2.5 given in AP-42. Assume PM2.5 emission factor equal to PM10 emission factor.

Mixing Process/Blocking Process/Middle Bagger

Total Output =
(Assume 10% Fines)

Process Weight
310,000 tons 120435.12 (lb/hr)
New Side and Old Side Ingredient Bins

Equipment	Throughput (tons)	Emission Source Category	Emission Factor (lb/ton)			Total Emissions (tons)		
			PM	PM-10	PM-2.5	PM	PM-10	PM-2.5
Baghouse - Assume 99% control	Mixer Paddle Baghouse (BH-1) or (BH-12)							
Mixer Paddle	310,000	Mixer ¹	0.061	0.034	0.0058	9.46E-02	5.27E-02	8.99E-03
Baghouse - Assume 99% control	Mixer Elevator Baghouse (BH-2)							
Elevator L-47	310,000	Headhouse and grain handling ²	0.061	0.034	0.0058	9.46E-02	5.27E-02	8.99E-03
						1.89E-01	1.05E-01	1.80E-02

1. AP-42 Table 9.9.1-2 lists this emission factor as ND. Use AP-42 Table 9.9.1-1 Grain Handling emission factor to approximate.
2. AP-42 Table 9.9.1-1

Pellet Mills #1, 2, 3 and 4

Screening
 Total Output =
 (Assume 10% Fines)

310,000 tons

Process Weight
 120435.12 (lb/hr)

Equipment	Throughput (tons)	Emission Source Category	Emission Factor (lb/ton)			Total Emissions (tons)		
			PM	PM-10	PM-2.5	PM	PM-10	PM-2.5
Internal Dust Control System - 99% control (BH-3)								
Pellet Mill Screener	310,000	Grain cleaning ^{1,2}	0.5	0.125	0.02	7.75E-01	1.94E-01	3.10E-02
Middle Bagger - 99% control (BH-8)								
Pellet Mill Screener	310,000	Feed Shipping ^{3,4}	0.0033	0.0008	0.0008	5.12E-03	1.24E-03	1.24E-03
						7.80E-01	1.95E-01	3.22E-02

1. AP-42 Table 9.9.1-1

2. Uncontrolled emission factor calculated by using the given control efficiency for a cyclone (85%) and back calculating

3. AP-42 Table 9.9.1-2

4. No emission factor for PM2.5 given in AP-42. Assume PM2.5 emission factor equal to PM10 emission factor.

Pellet Mill #1

Total Output =
(Assume 10% Fines)

62000 tons

Process Weight
24087.02 (lb/hr)

Equipment	Throughput (tons)	Emission Source Category	Emission Factor (lb/ton)			Total Emissions (tons)		
			PM	PM-10	PM-2.5	PM	PM-10	PM-2.5
Internal Dust Control System - 99% control (BH-3)								
Elevator L-5	62000	Headhouse and grain handling ¹	0.061	0.034	0.0058	1.89E-02	1.05E-02	1.80E-03
Elevator L-7	6200	Headhouse and grain handling ¹	0.061	0.034	0.0058	1.89E-03	1.05E-03	1.80E-04
						2.08E-02	1.16E-02	1.98E-03

1. AP-42 Table 9.9.1-1

Pellet Mill #2

Total Output =
(Assume 10% Fines)

62000 tons

Process Weight
24087.02 (lb/hr)

Equipment	Throughput (tons)	Emission Source Category	Emission Factor (lb/ton)			Total Emissions (tons)		
			PM	PM-10	PM-2.5	PM	PM-10	PM-2.5
Internal Dust Control System - 99% control (BH-3)								
Elevator L-4	62000	Headhouse and grain handling ¹	0.061	0.034	0.0058	1.89E-02	1.05E-02	1.80E-03
Elevator L-6	6200	Headhouse and grain handling ¹	0.061	0.034	0.0058	1.89E-03	1.05E-03	1.80E-04
						2.08E-02	1.16E-02	1.98E-03

1. AP-42 Table 9.9.1-1

Pellet Mill #3

Total Output =
(Assume 10% Fines)

62000 tons

Process Weight
24087.02 (lb/hr)

Equipment	Throughput (tons)	Emission Source Category	Emission Factor (lb/ton)			Total Emissions (tons)		
			PM	PM-10	PM-2.5	PM	PM-10	PM-2.5
Baghouse - Assume 99% control		Pellet Mill #4 Baghouse (BH-4)						
Bin 42	31000	Storage bin (vent) ¹	0.025	0.0063	0.0011	3.88E-03	9.77E-04	1.71E-04
Bin 43	31000	Storage bin (vent) ¹	0.025	0.0063	0.0011	3.88E-03	9.77E-04	1.71E-04
Internal Dust Control System - 99% control (BH-3)								
Elevator L-49 Fines Return	6200	Headhouse and grain handling ¹	0.061	0.034	0.0058	1.89E-03	1.05E-03	1.80E-04
						9.64E-03	3.01E-03	5.21E-04

1. AP-42 Table 9.9.1-1

Pellet Mill #4

Total Output =
(Assume 10% Fines)

62000 tons

Process Weight
24087.02 (lb/hr)

Equipment	Throughput (tons)	Emission Source Category	Emission Factor (lb/ton)			Total Emissions (tons)		
			PM	PM-10	PM-2.5	PM	PM-10	PM-2.5
Baghouse - Assume 99% control								
Pellet Mill #4 Baghouse (BH-4)								
Bin 34	31000	Storage bin (vent) ¹	0.025	0.0063	0.0011	3.88E-03	9.77E-04	1.71E-04
Bin 35	31000	Storage bin (vent) ¹	0.025	0.0063	0.0011	3.88E-03	9.77E-04	1.71E-04
Internal Dust Control System - 99% control (BH-3)								
Elevator L-51 Fines Return	6200	Headhouse and grain handling ¹	0.061	0.034	0.0058	1.89E-03	1.05E-03	1.80E-04
						9.64E-03	3.01E-03	5.21E-04

1. AP-42 Table 9.9.1-1

CRITERIA EMISSIONS - NATURAL GAS COMBUSTION

Emission Factors

NOx	100 lb/10 ⁶ scf	AP-42, Table 1.4-1, 1998
CO	84 lb/10 ⁶ scf	AP-42, Table 1.4-1, 1998
PM-10	7.6 lb/10 ⁶ scf	AP-42, Table 1.4-2, 1998
SOx	0.8 lb/10 ⁶ scf	AP-42, Table 1.4-2, 1998
VOC	5.5 lb/10 ⁶ scf	AP-42, Table 1.4-2, 1998

Description	Rated MMBTU/HR	Therm/HR	Fuel Usage (Therms/yr)	Ton per Year						
				Throughput (scf/yr)	Hours (hr/yr)	NOx Emissions (T/yr)	CO Emissions (T/yr)	PM-10/PM- 2.5 Emissions (T/yr)	SOx Emissions (T/yr)	VOC Emissions (T/yr)
Boiler 1	8.4	84	735,840	7,214,118	8,760	0.3607	0.3030	0.0274	0.0022	0.0198
Boiler 2	4.1	41	359,160	3,521,176	8,760	0.1781	0.1479	0.0134	0.0011	0.0097
Boiler 3	4.1	41	359,160	3,521,176	8,760	0.1781	0.1479	0.0134	0.0011	0.0097
TOTAL=			1,454,160	14,256,471	26,280	0.7128	0.5988	0.0542	0.0043	0.0392

HAPS EMISSIONS - NATURAL GAS COMBUSTION

**TOXIC AIR POLLUTANTS (TAPs) COMBUSTION CALCULATIONS
GEM STATE**

Description	Throughput (scf/yr)	Hours (hr/yr)	(scf/hr)
Boiler 1	7,214,117.65	8,760	823.53
Boiler 2	3,521,176.47	8,760	401.96
Boiler 3	3,521,176.47	8,760	401.96

NON-CARCINOGENS (POUNDS PER HOUR)

Pollutant	CAS #	EF for NG Combustion (lb/10 ⁶ scf ^a)	TAP Emissions (lb/hr)	Screening Level (lb/hr)	Modeling? (Y/N)
Antimony	7440-36-0	0.0E+00	0.00E+00	3.3E-02	No
Barium	7440-39-3	4.4E-03	7.16E-06	3.3E-02	No
Chromium	7440-47-3	1.4E-03	2.28E-06	3.3E-02	No
Cobalt	7440-48-4	8.4E-05	1.37E-07	3.3E-03	No
Copper	7440-50-8	8.5E-04	1.38E-06	6.7E-02	No
Ethylbenzene	100-41-4	0.0E+00	0.00E+00	2.9E+01	No
Fluoride (as F)	16984-48-8	0.0E+00	0.00E+00	1.67E-01	No
Hexane	110-54-3	1.8E+00	2.93E-03	1.2E+01	No
Manganese	7439-96-5	3.8E-04	6.18E-07	3.33E-01	No
Mercury	7439-97-6	2.6E-04	4.23E-07	3.E-03	No
Molybdenum	7439-98-7	1.1E-03	1.79E-06	3.33E-01	No
Naphthalene	91-20-3	6.1E-04	9.93E-07	3.33E+00	No
Pentane	109-66-0	2.6E+00	4.23E-03	1.18E+02	No
Phosphorous	7723-14-0	0.0E+00	0.00E+00	7.E-03	No
Selenium	7782-49-2	2.4E-05	3.91E-08	1.3E-02	No
1,1,1-Trichloroethane	71-55-6	0.0E+00	0.00E+00	1.27E+02	No
Toluene	108-88-3	3.4E-03	5.53E-06	2.5E+01	No
o-Xylene	1330-20-7	0.0E+00	0.00E+00	2.9E+01	No
Zinc	7440-66-6	2.9E-02	4.72E-05	6.67E-01	No

CARCINOGENS (POUNDS PER HOUR)

Pollutant	CAS #	EF for Natural Gas Combustion (lb/10 ⁶ scf ^a)	TAP Emissions (lb/hr)	Screening Level (lb/hr)	Modeling? (Y/N)
Arsenic	7440-38-2	2.0E-04	3.25E-07	1.5E-06	No
Benzene	71-43-2	2.1E-03	3.42E-06	8.0E-04	No
Beryllium	7440-41-7	1.2E-05	1.95E-08	2.8E-05	No
Cadmium	7440-43-9	1.1E-03	1.79E-06	3.7E-06	No
Chromium VI	7440-47-3	0.0E+00	0.00E+00	5.8E-07	No
Formaldehyde	50-00-0	7.5E-02	1.22E-04	5.1E-04	No
Nickel	7440-02-0	2.1E-03	3.42E-06	2.7E-05	No
Benzo(a)pyrene	50-32-8	1.2E-06	1.95E-09	2.0E-06	No
Benzo(a)anthracene	56-55-3	1.8E-06	2.93E-09	NA	No
Benzo(b)fluoranthene	205-82-3	1.8E-06	2.93E-09	NA	No
Benzo(k)fluoranthene	205-99-2	1.8E-06	2.93E-09	NA	No
Chrysene	218-01-9	1.8E-06	2.93E-09	NA	No
Dibenzo(a,h)anthracene	53-70-3	1.2E-06	1.95E-09	NA	No
Indeno(1,2,3-cd)pyrene	193-39-5	1.8E-06	2.93E-09	NA	No
Total PAHs		1.1E-05	1.86E-08	2.00E-06	No

^aEFs from AP-42, Tables 1.4-3 and 1.4-4, 7/98

^bEFs from AP-42, Table 1.3-10, 9/98

PARTICULATE EMISSIONS - SEED PROCESSING

Description	Maximum Throughput (ton/yr)	Control Factor (%)	Uncontrolled		Controlled		Control Device	Process Weight
			PM-10 EF (lb/ton)	PM-2.5 EF (lb/ton)	PM-10 Emissions (ton/yr)	PM-2.5 Emissions (ton/yr)		
Truck Unloading (Seed Receiving) ^a	2,500		0.059	0.01	0.074	0.013		0.49 (lb/hr)
Seed conveying (to bins and boxes) ^b	2,500		0.034	0.0058	0.043	0.007		
Screen Line #1 (screening/cleaning total)	825	85%	0.125	0.0213	0.0077	0.0013	CY-1 & 2	
Screen Line #1 ^b (material handling conveyor (2) legs)	825	85%	0.034	0.0058	0.0021	0.0004	CY-1 & 2	
Screen Line #2 (screening/cleaning)	825	85%	0.125	0.0213	0.0077	0.0013	CY-3	
Screen Line #2 ^d (screening only)	825	75%	0.125	0.0213	0.0129	0.0022	CY-3	
Screen Line #2 ^b (material handling conveyor (2) legs)	825	85%	0.034	0.0058	0.0021	0.0004	CY-3	
Screen Line #3 (screening/boxed + cleaned only)	825	99%	0.125	0.0213	5.156E-04	8.7986E-05	BH-15	
Screen Line #3 ^b (material handling conveyor leg)	825	99%	0.034	0.0058	1.403E-04	2.3925E-05	BH-15	
Secondary Bagger ^f (Oats + screening)	825		0.0063	0.0011	2.599E-03	4.5375E-04		
Truck Loading ^g (screened seed + treated seed)	1,250.00		0.029	0.0049	0.0000	0.002		
					0.15	0.03		

^a AP-42 Table 9.9.1-1 Grain receiving- straight truck

^b AP-42 Table 9.9.1-1 Headhouse and grain handling (conveyors, belts etc.)

^c AP-42 Table 9.9.1-1 Grain cleaning (cyclone control efficiency assumed to be 85%) - Line #1 & #2 throughput reflects initial cleaning and box + bagged cleaning to get total emissions from two separate cleaning operations.

^d AP-42 Table 9.9.1-1 Grain cleaning (inside building assumed control efficiency of 75%- consistent with 3-sided enclosure)

^e AP-42 Table 9.9.1-1 Grain cleaning (baghouse control efficiency assumed to be 99%)

^f AP-42 Table 9.9.1-1 Storage bin

^g AP-42 Table 9.9.1-1 Grain shipping (truck). Treated seed has had liquid applied and is assumed to have 50% lower emissions than untreated seed.

Rail and Truck Raw Commodity Loadout (Feed and Seed)

Total Output =

28,700 tons

Process Weight
11149.96 (lb/hr)

Equipment	Throughput (tons)	Emission Source Category	Emission Factor (lb/ton)			Total Emissions (tons)		
			PM	PM-10	PM-2.5	PM	PM-10	PM-2.5
Product Truck Loadout	28,700	Grain Truck Shipping	0.086	0.029	0.0049	1.23E+00	4.16E-01	7.03E-02
						1.23E+00	4.16E-01	7.03E-02

1. AP-42 Table 9.9.1-1

GHG EMISSIONS - NATURAL GAS COMBUSTION

2010 Green House Calculations

		CO ₂ e metric tons				
Total Direct emissions		7,717.52				
Natural Gas						
Month	Therms (All Boilers)	mmbtu	metric tons CO ₂	Metric tons CH ₄	Metric tons N ₂ O	CO ₂ Equivalent
Jan	121,180	12,118	642	0.01	0.0012	643.13
Feb	121,180	12,118	642	0.01	0.0012	643.13
Mar	121,180	12,118	642	0.01	0.0012	643.13
Apr	121,180	12,118	642	0.01	0.0012	643.13
May	121,180	12,118	642	0.01	0.0012	643.13
Jun	121,180	12,118	642	0.01	0.0012	643.13
Jul	121,180	12,118	642	0.01	0.0012	643.13
Aug	121,180	12,118	642	0.01	0.0012	643.13
Sep	121,180	12,118	642	0.01	0.0012	643.13
Oct	121,180	12,118	642	0.01	0.0012	643.13
Nov	121,180	12,118	642	0.01	0.0012	643.13
Dec	121,180	12,118	642	0.01	0.0012	643.13
Total	1,454,160	145,416	7,710	0.15	0.0145	7,717.52

Facility Example Calculations

In calendar year **2010** the facility used **351,110 mmbtu** of natural gas

$$\text{CO}_2 = 1 \times 10^{-3} * \text{Fuel} * \text{EF (Equation C-1)}$$

$$\text{CO}_2 = 1 \times 10^{-3} * 351,110 \text{ mmbtu} * 53.02 \text{ kg CO}_2/\text{mmbtu}$$

$$\text{CO}_2 = 18,616 \text{ metric tons CO}_2$$

$$\text{CH}_4 = 1 \times 10^{-3} * \text{Fuel} * \text{EF (Equation C-8)}$$

$$\text{CH}_4 = 1 \times 10^{-3} * 351,110 \text{ mmbtu} * 1 \times 10^{-3} \text{ kg CH}_4/\text{mmbtu}$$

$$\text{CH}_4 = 0.65 \text{ metric tons CH}_4$$

$$\text{N}_2\text{O} = 1 \times 10^{-3} * \text{Fuel} * \text{EF (Equation C-8)}$$

$$\text{N}_2\text{O} = 1 \times 10^{-3} * 351,110 \text{ mmbtu} * 1.0 \times 10^{-4} \text{ kg N}_2\text{O}/\text{mmbtu}$$

$$\text{N}_2\text{O} = 0.0351 \text{ metric tons N}_2\text{O}$$

$$\text{CO}_2\text{e} = \text{CO}_2 + 21 * \text{CH}_4 + 310 * \text{N}_2\text{O}$$

$$\text{CO}_2\text{e} = 18,616 + 21 * 0.35 + 310 * 0.0351$$

$$\text{CO}_2\text{e} = 18,634.12 \text{ metric tons}$$

Formula for Emission is from 40 CFR part 98.33:

HHV	From Table C-1 (Note if available on bills then should use from bills and use equation C-2 instead of equation C-1)	
Fuel	Standard Cubic Feet (Check the bill and see if reporting in STP or if we have to convert)	
EF	53.02 kg CO ₂ /mmBTU	From Table C-1
EF	0.001 kg CH ₄ /mmbtu	From Table C-2
EF	0.0001 kg N ₂ O/mmbtu	From Table C-2

APPENDIX B – FACILITY DRAFT COMMENTS

The following comments were received from the facility on February 1, 2012:

Facility Comment: The process labeling for each baghouse should be updated in Table 1 of the PTC. Baghouse 3 is for Pellet Mills 1 and 2, Baghouse 4 is for Pellet Mills 3 and 4, Baghouse 5 is for Grinder, Baghouse 8 is for Middle Bagger, Baghouse 9 is for New Side Receiving and Grinding, Baghouse 10 is for Old Side Receiving and Grinding, Baghouse 12 is for Rollo Mixer, Baghouse 13 is for Feed Mill Storage and Receiving, and Baghouse 14 is for Product Loadout.

DEQ Response: These changes have been made to update Table 1.

Facility Comment: In Table 2 of the PTC, number 2 should be updated to include the Non-Med Pellet Mill.

DEQ Response: This change has been made to Table 2 of the PTC.

Facility Comment: The annual feed throughput limit should also mention that the non-medicated feed line can also process animal feed at 62,000 tpy.

DEQ Response: Permit Condition 9 has been updated to include the Non-Medicated Feed Line limit of 62,000 tpy.

Facility Comment: Since receiving the draft permit, the facility has determined that a facility wide commodity receiving limit of 310,000 tpy would be preferable. The emissions inventory has been updated. The raw commodity receiving throughput limit needs to be changed to 310,000 tpy.

DEQ Response: Permit Condition 10 has been changed to reflect the new throughput limit. DEQ has also reviewed the revised emissions inventory for completeness and accuracy.

Facility Comment: The emissions inventory has been updated and is based on 8,760 hours per year. Therefore, the facility requests that no hourly operating limits be required.

DEQ Response: The annual feed processing operational limit and monitoring requirements have been removed from the PTC as emissions are now based on 8,760 hours per year.

Facility Comment: Given the proposed changes to Permit Condition 9, the facility proposes adding analogous language to the annual feed throughput monitoring condition.

DEQ Response: Permit Condition 15 has been revised to include the non-medicated feed line.

Facility Comment: The facility receives raw commodities in both bulk and bagged form. For conservatism, the facility assumed that all commodities received were bulk for the emission inventory. However, since only bulk commodities are susceptible to wind erosion, the facility proposes that they only track bulk commodities.

DEQ Response: Permit Condition 16 has been revised to monitor and record the amount of bulk commodities.

Facility Comment: Given that the feed and the seed operations occur at the same facility and that the requirements associated with the seed operations have significant overlap with those already listed for the feed operations, the facility proposes that the requirements listed under Seed Processing Operations be integrated into those already listed in the permit. This will clarify the facility requirements and will allow for no duplication of permit requirements.

DEQ Response: DEQ has separated the animal feed and seed operations because the two operations use different control equipment and have different emission limits. In addition the animal feed operations are subject to 40 CFR 63 Subpart DDDDDDD.

Facility Comment: The facility was able to find the manufacturer's boiler plate rating for the three onsite boilers. As a result, the facility would like to update Permit Condition 47 to include the maximum rated capacity of each boiler.

DEQ Response: Permit Condition 47 has been updated to list Boiler 1 as 8.4 MMBtu/hr, and Boilers 2 and 3 as 4.1 MMBtu/hr.

Facility Comment: Greenhouse Gas (GHG) emissions associated with the facility have been developed and submitted. These emissions are associated with the natural gas combustion by the three onsite boilers. The GHG emissions calculated were minimal in nature and will not require any additional permit conditions.

DEQ Response: DEQ has included the GHG emissions in the Statement of Basis. DEQ has checked the calculations for accuracy.

APPENDIX C – PROCESSING FEE

PTC Fee Calculation

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.R. Simplot Company Western Stockmen's (WSI)
Address: 223 Rodeo Avenue
City: Caldwell
State: Idaho
Zip Code: 83605
Facility Contact: Ron Parks
Title: Environmental Manager
AIRS No.: 027-00008

- 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	0.000	2.89	-2.9
SO ₂	0.000	0.002	0.0
CO	0.000	0.11	-0.1
PM10	0.500	0	0.5
VOC	0.000	0.24	-0.2
TAPS/HAPS	0.013	0	0.0
Total:	0.000	3.242	-2.7
Fee Due	\$ 1,000.00		

Comments:

