



**Air Quality Permitting
Statement of Basis**

February 11, 2005

Permit to Construct No. P-040047

Double J Milling LLC, Mt. Home

Facility ID No. 039-00021

Prepared by:

**Carole Zundel, Permit Writer
AIR QUALITY DIVISION**

FINAL PERMIT

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

2. FACILITY DESCRIPTION

The roller mill uses steam flaking technology. Steam flaking is the process of smashing whole grain into a flake by first applying water and steam to soften the grain then using steel rollers to flatten it. Flaked grain is fed to both feedlot cattle and dairy cattle. Two natural-gas boilers are used to supply steam to the process. Two 18,000-bushel staging bins temporarily hold the grain before the steam flaking process begins. Four cyclones are involved in conveying the finished wet/hot flakes from the rollers to the finished product load-out bins. Two cyclones are used to capture fine particulate matter from the cooling process. One cyclone pneumatically conveys the fines collected by the grain cleaner to the west load-out bin.

3. FACILITY / AREA CLASSIFICATION

Double J Milling LLC is defined as a true minor facility because the potential to emit of CO, PM, SO₂, NO_x, VOC, and HAPs are less than the major source thresholds for each pollutant.

The facility is located within AQCR 63 and UTM zone 11. The facility is located in Elmore County which is designated as nonattainment for PM₁₀ and unclassifiable for all other criteria pollutants (CO, NO_x, SO₂, lead, and ozone).

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at Double J Milling LLC. This required information is entered into the EPA AIRs database.

4. APPLICATION SCOPE

Double J Milling LLC has applied for a permit to construct revision to change the name on the PTC issued to J. R. Simplot Company for the Mt. Home rolling mill, PTC No. P-030048. No other changes are requested. There will be no change in emissions.

4.1 *Application Chronology*

12/21/04	Application Received
1/20/05	Application declared complete

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC action.:

5.1 *Equipment Listing*

The following is a list of the equipment with specific permit conditions:

- Two 18,000 bushel staging bins
- Seven high-efficiency cyclones

Wet/hot flakes airlift (4 cyclones)
Cooling fans cyclones (2)
Cleaner fines cyclone

- Two boilers

Manufacturer: Johnson
Model: PFTA800-4G150S
Horsepower: 800
Btu rating: 32.4 MMBtu/hr each
Fuel: Natural gas
Burner type: Low NO_x

5.2 Emissions Inventory

There is no change in emissions as a result of this name change.

5.3 Fee Review

This permit application is exempt from the permit to construct application fee because it is a change in name and no other review or analysis is required per IDAPA 58.01.01.224.03. The permit to construct is exempt from the permit processing fee for the same reason per IDAPA 58.01.01.225. The source is a minor source and not subject to registration fees.

5.4 Regional Review of Draft Permit

A draft copy of the permit was provided to the Boise Regional Office for comment on January 7, 2005. The Boise Regional Office had no comments on the permit per an e-mail dated January 11, 2005.

5.5 Facility Review of Draft Permit

A facility draft permit was not requested by the facility.

6. PUBLIC COMMENT

An opportunity for public comment period on the PTC application is not required to be provided in accordance with IDAPA 58.01.01.209.04, because this is a revision to a PTC with no increase in emissions.

7. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that Double J Milling LLC be issued PTC No. P-040047 for the rolling mill in Mt. Home. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

CZ/xx Permit No. P-040047

G:\Air Quality\Stationary Source\SS Ltd\PTC\Double J Milling\Final\P-040047 Final SB.doc

Appendix A

Double J Milling LLC, Mt. Home

P-040047

AIRS Table

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

Facility Name: Double J Milling LLC
Facility Location: State Highway Business 84, one mile northwest of Mountain Home
AIRS Number: 039-00021

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

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

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b 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).