



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON, BOISE, ID 83706 · (208) 373-0502

C. L. "BUTCH" OTTER, GOVERNOR
TONI HARDESTY, DIRECTOR

June 4, 2010

Steve Busby – Idaho Operations Manager
J. D. Heiskell & Co. – Gooding, ID
P.O. Box 839
Wendell, ID 83355

RE: Facility ID No. 047-00011, J. D. Heiskell & Co. – Gooding, ID
Final Permit Letter

Dear Mr. Busby:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2010.0025 to J. D. Heiskell & Co. – Gooding, ID for a name change from Land O'Lakes Purina Feed LLC, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on February 12, 2010. This permit is effective immediately and replaces PTC No. P-050403, issued on June 2, 2005. This permit does not release J. D. Heiskell & Co. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Steve VanZandt, Air Quality Analyst, at (208) 736-2190 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Kathleen Hieb at (208) 373-0502 or kathleen.hieb@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\klh

Project No. P-2010.0025

Enclosures

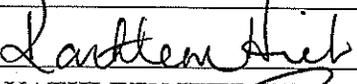
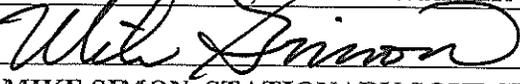
<p style="text-align: center;">Air Quality PERMIT TO CONSTRUCT State of Idaho Department of Environmental Quality</p>	PERMIT NUMBER	CLASS	SIC
	P-2010.0025	B	2048
	FACILITY ID	AQCR	NAICS
	047-00011	063	311119
	ZONE	UTM COORDINATES (km)	
	11	686.9	4757.2
PERMITTEE			
J. D. Heiskell & Co.			
PROJECT			
Permit to Construct Revision			
MAILING ADDRESS	CITY	STATE	ZIP
P.O. Box 839	Wendell	ID	83355
FACILITY CONTACT	TITLE	TELEPHONE	
Steve Busby	Idaho Operations Manager	208 934-5277	
RESPONSIBLE	TITLE	TELEPHONE	
Steve Busby	Idaho Operations Manager	208 934-5277	
EXACT PLANT LOCATION		COUNTY	
1177 South 2300 East Gooding, ID		Gooding	
GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS			
Commercial livestock feed processing			
PERMIT AUTHORITY			
<p>This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.</p> <p>This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.</p> <p>This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.</p> <p>This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.</p>			
 KATHLEEN HIEB, PERMIT WRITER		DATE ISSUED	June 9, 2010
 MIKE SIMON, STATIONARY SOURCE MANAGER			

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PERMIT TO CONSTRUCT SCOPE

Purpose

1. This is a revised permit to construct to reflect a name change from Land O'Lakes Purina Feed LLC to J.D. Heiskell & Co.
2. Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
3. This PTC replaces Permit to Construct No. P-050403, issued on June 2, 2005.
4. The emission sources regulated by this permit are listed in the following table.

Table 1 REGULATED SOURCES

Source Descriptions	Emission Controls
Natural Gas-Fired Boiler Rated Heat Input Capacity: 4.3 MMBtu/hr	None
Grain Receiving System – Dairy Feed Supplement	None

BOILER, GRAIN RECEIVING AND HANDLING, AND DAIRY FEED SUPPLEMENTS

Process Description

5. Process Description

The facility operates a natural gas-fired boiler with a rated heat input capacity of 4.83 MMBtu/hr. The boiler is used to supply steam to the corn and barley flaking process. The facility also operates a grain receiving system capable of handling 40,000 bushels per hour, and dairy feed supplement system that receives, stores, blends and loads out vitamin/mineral supplements.

6. Emission Controls Description

Emissions from the boiler are uncontrolled. No stack is associated with the grain receiving and dairy feed supplement systems.

Emission Limits

7. Opacity Limit

Emissions from the boiler stack, or any other stack, vent, or functionally equivalent opening associated with the facility, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

8. Visible Emission Limits

Visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60 minute period. Visible emissions shall be determined by EPA Reference Method 22, as described in 40 CFR 60, Appendix A, or a DEQ-approved alternative method.

Operating Requirements

9. Reasonable Control of Fugitive Dust

In accordance with IDAPA 58.01.01.625, all reasonable precautions shall be taken to prevent particulate matter from becoming airborne. In determining what is reasonable, considerations will be given to factors such as the proximity of dust emitting operations to human habitations and/or activities, the proximity to mandatory Class I Federal Areas and atmospheric conditions which might affect the movement of particulate matter. Some of the reasonable precautions may include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
- Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans and fabric filers or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, when practical, open bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving or roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

10. Open Burning

The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.

Monitoring and Recordkeeping Requirements

11. Fugitive Dust Complaint Monitoring

The permittee shall maintain records of any fugitive dust complaints received. The records shall include, at a minimum, the date that a complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, and any corrective action(s) taken to remedy the cause for the complaint. This information shall be made available to DEQ representatives upon request.

PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

12. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
- [Idaho Code §39-101, et seq.]**
13. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
- [IDAPA 58.01.01.211, 5/1/94]**
14. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.
- [IDAPA 58.01.01.212.01, 5/1/94]**

Inspection and Entry

15. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

16. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
- A notification of the date of initiation of construction, within five working days after occurrence;
 - A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
 - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
 - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and

- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

17. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ, at its option, may have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
18. All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
19. Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

20. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

21. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

22. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

23. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125, 3/23/98]

Tampering

24. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.126, 3/23/98]

Transferability

25. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.
[IDAPA 58.01.01.209.06, 4/11/06]

Severability

26. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
[IDAPA 58.01.01.211, 5/1/94]