

Statement of Basis

Final

J. D. Heiskell & Co.

Gooding, Idaho

Facility ID No. 047-00011

Permit to Construct P-2010.0025

A handwritten signature in black ink, reading "Kathleen Hieb". The signature is written in a cursive style and is positioned above the printed name and title.

June 4, 2010

Kathleen Hieb

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

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	Best Available Control Technology
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAP	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
m	meters
MACT	Maximum Achievable Control Technology
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	tons per consecutive 12-calendar month period
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

FACILITY INFORMATION

Description

The J.D. Heiskell & Co. – Gooding, ID facility is comprised of these process areas. The facility receives and stores grain using a grain receiving system, steam flakes corn and barley, and receives, stores, blends, and loads out vitamin/mineral supplements for the dairy industry.

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.

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

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).

June 2, 2005	P-050403, Facility name change from Land O'Lakes Farmland Feed LLC to Land O'Lakes Purina Feed LLC, Permit status (S)
November 8, 1999	P-990073, Initial PTC for Land O'Lakes Feed Division, Permit status (S)

Application Scope

This PTC is a revision of an existing PTC. The applicant has proposed to change the name of the facility from Land O'Lakes Purina Feed LLC to J.D. Heiskell & Co. Administrative changes to the cover page information include: mailing address; facility contact; and the SIC classification code.

Application Chronology

February 12, 2010	DEQ received an application.
March 8, 2010	DEQ determined that the application was complete.
April 28, 2010	DEQ made available the draft permit and statement of basis for peer and regional office review.
May 3, 2010	DEQ made available the draft permit and statement of basis for applicant review.
June 4, 2010	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Devices

No equipment changes are associated with this PTC. For a complete listing of equipment, please refer to the technical memorandum issued with the November 8, 1999 permit to construct P-990073 and the notification letter of process change received by DEQ on March 26, 2007.

Emissions Inventories

A new emissions inventory is not required because emissions are not increasing.

Ambient Air Quality Impact Analyses

Ambient air quality modeling is not required because emissions are not increasing.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Gooding 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 58.01.01.201

Permit to Construct Required

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

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401

Tier II Operating Permit

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

Permit Conditions Review

Cover page:

The SIC code was changed from 0723 “Crop Preparation Services for Market” to 2048 “Prepared Feeds & Feed Ingredients for Animals and Fowls”

The NAICS code was added to the permit: 311119 “Other Animal Food Manufacturing”

Changes per information provided by the applicant on the permit application: Facility name; mailing address; and facility contact.

Permit conditions:

The permit condition numbers have been changed to reflect current permitting practices.

Process Descriptions:

No changes.

Emission Limits:

No changes.

Operating Requirements:

Reasonable Control of Fugitive Dust: Verbiage was updated to reflect current permitting practices.

Monitoring and Recordkeeping Requirements:

Fugitive Dust Complaint Monitoring: Verbiage was updated to reflect current permitting practices.

Reporting Requirements:

Certification of Documents: Removed this permit condition because it is a duplication of PTC General Provision for Certification.

PUBLIC REVIEW

Public Comment Opportunity

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

PERMIT FEES

This permitting action is for a name change which is exempt from PTC application and processing fees.

APPENDIX A – FACILITY DRAFT COMMENTS

No comments were received from the facility.

AIRS/AFS Facility-wide Classification – Data Form

Facility Name: J. D. Heiskell & Co.
Facility Location: Gooding
Facility ID: 047-00011 **Date:** April 23, 2010
Project/Permit No.: P-2010.0025 **Completed By:** Kathleen Hieb

- Check if there are no changes to the facility-wide classification resulting from this action. (compare to form with last permit)
 Comments: Name change from Land O'Lakes Purina Feed LLC
- Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassifiable) for the following pollutants:

	SO ₂	PM ₁₀	VOC	
Area Classification:	U	U	U	DO NOT LEAVE ANY BLANK

Check one of the following:

- SIP [0]** - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)
- OR
- Title V [V]** - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO ₂	NO _x	CO	PM ₁₀	PT (PM)	VOC	THAP
Classification:	B	B	B	B	B	B	B

- PSD [6]** - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO ₂	NO _x	CO	PM ₁₀	PT (PM)	VOC	THAP
	<input type="checkbox"/>						

- NSR - NAA [7]** - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

	SO ₂	NO _x	CO	PM ₁₀	PT (PM)	VOC	THAP
	<input type="checkbox"/>						

- NESHAP [8]** - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

- NSPS [9]** - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO ₂	NO _x	CO	PM ₁₀	PT (PM)	VOC	THAP
	<input type="checkbox"/>						

- MACT [M]** - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?