



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

October 25, 2004

Certified Mail No. 7000 0520 0016 0850 3007

Earl W. Reed, Owner
Reed Barley Storage, LLC
P.O. Box 1901
Twin Falls, Idaho 83303

RE: Facility ID No. 053-00008, Reed Barley Storage, LLC, Hazelton
Final Permit to Construct

Dear Mr. Reed:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-030414 for Reed Barley Storage, LLC (RBS) in accordance with IDAPA 58.01.01.200 through 228, (*Rules for the Control of Air Pollution in Idaho*). This PTC is effective immediately and is based on your permit application received June 3, 2003, and additional information received December 5, 2003 and April 12, 2004.

This permit does not release RBS from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. Please refer to the appropriate permit number when submitting reports required in the Reporting Requirements section of the permit.

A representative of the Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. In addition to your facility's plant manager, DEQ recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the 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 call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

If you have any questions about the enclosed permit or the permitting process, please contact Bill Rogers at (208) 373-0502 or wrogers@deq.state.id.us.

Sincerely,

A handwritten signature in cursive script that reads "Martin Bauer".

Martin Bauer, Administrator
Air Quality Division

BR/HE/sd Permit No. P-030414



Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality

PERMIT No.: P-030414
FACILITY ID No.: 053-00008
AQCR: 063 **CLASS:** B
SIC: 5153 **ZONE:** 11
UTM COORDINATE (km): 733.6, 4720.7

1. PERMITTEE
Reed Barley Storage, LLC

2. PROJECT
Permit to Construct for a Grain Elevator

3. MAILING ADDRESS P.O. Box 1901	CITY Twin Falls	STATE Idaho	ZIP 83303
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4. FACILITY CONTACT Earl W. Reed	TITLE Owner	TELEPHONE (208) 734-5681
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5. RESPONSIBLE OFFICIAL Earl W. Reed	TITLE Owner	TELEPHONE (208) 734-5681
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6. EXACT PLANT LOCATION 2576 Highway 25, Hazelton, Idaho 83335	COUNTY Jerome
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7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Receive, store, and ship barley

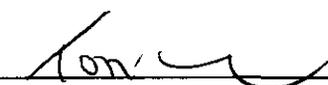
8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, 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.

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.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.



TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: October 25, 2004

Table of Contents

1. PERMIT TO CONSTRUCT SCOPE.....	4
2. GRAIN ELEVATOR OPERATIONS.....	5
3. PERMIT TO CONSTRUCT GENERAL PROVISIONS.....	9

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
DEQ	Idaho Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
O&M	<i>operations and maintenance</i>
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
RBS	Reed Barley Storage, LLC
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030414

Permittee:	Reed Barley Storage, LLC	Facility ID No. 053-00008	Date Issued:	October 25, 2004
Location:	Hazelton, Idaho			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 The purpose of this permit to construct (PTC) is to satisfy the requirements of IDAPA 58.01.01.200 et seq., *Rules for the Control of Air Pollution in Idaho*.
- 1.2 Prior to this PTC no permit existed at the facility.

Regulated Sources

Table 1.1 lists all sources of emissions that are regulated in this PTC.

Table 1.1 REGULATED EMISSIONS SOURCES

Permit Sections	Source Description	Emissions Control(s)
2	<p><u>Grain Elevator Operations</u> The grain elevator at Reed Barley Storage will receive, store, and ship malting barley to other facilities for further processing. The only grain handled at this facility is malting barley, which will be stored in 12 metal silos.</p>	<p><u>Baghouse</u> Manufacturer: Dustex Corporation Model No: 3600-11-12 Number of bags: 132 Type filter media; polyester Air-to-cloth ratio: 12.0:1 Design pressure drop: 4-6 inches water gauge.</p>

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2. GRAIN ELEVATOR OPERATIONS

2.1 Process Description

The grain elevator operations at Reed Barley Storage (RBS) are limited to processing and handling malting barley, which will be stored in 12 metal silos. Process operations at RBS include the following: barley unloading from hopper trucks and straight trucks, barley handling, barley loading and unloading by railcars, truck loading, and baghouse waste loading into trucks. Each of these operations releases particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) to the atmosphere.

Fugitive emissions also occur from truck and rail loading, truck and rail unloading, and baghouse waste loading.

The permanent storage capacity of this grain elevator is 2.43 million U.S. bushels. The facility is not subject to New Source Performance Standards, Subpart DD.

2.2 Emissions Control Description

The PM₁₀ emissions from the grain elevator are controlled by a baghouse having a particulate matter control efficiency of 99.7%.

Emissions Limits

2.3 Visible Emissions Limit

A person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.4 PM₁₀ Emissions Limits

Particulate matter with an aerodynamic diameter less than or equal to nominal 10 micrometers (PM₁₀) from the grain elevator baghouse stack shall not exceed any corresponding emissions rate limits listed in Table 2.4.

Table 2.4 EMISSIONS LIMITS FROM THE BAGHOUSE STACK

Source Description	PM ₁₀	
	lb/hr	T/yr*
Grain elevator baghouse stack	0.09	0.01

* tons per any consecutive 12-month period

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030414

Permittee:	Reed Barley Storage, LLC	Facility ID No. 053-00008	Date Issued:	October 25, 2004
Location:	Hazelton, Idaho			

Operating Requirements

2.5 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. 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 and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions 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 lands.
- 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 filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

2.6 Throughput Limits

The throughput of barley shall not exceed a maximum of 192,030 tons of barley in any consecutive 12-month period.

2.7 Baghouse Monitoring Equipment

The permittee shall, in accordance with manufacturer specifications, install, calibrate, maintain, and operate equipment to continuously measure the pressure differential across the grain elevator baghouse.

2.8 Operations and Maintenance Manual

Within 60 days of permit issuance, the permittee shall have developed an operations and maintenance (O&M) manual for the baghouse. The manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouse. The manual shall contain, at a minimum, the pressure drop operating range for the baghouse and scheduled maintenance requirements. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request. Within 30 days of O&M manual development, the permittee shall submit a copy of the manual to DEQ.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030414

Permittee:	Reed Barley Storage, LLC	Facility ID No. 053-00008	Date Issued:	October 25, 2004
Location:	Hazelton, Idaho			

2.9 Pressure Drop Across the Baghouse

The pressure drop across the baghouse shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.10 Baghouse Operations

The baghouse shall be operated whenever the grain elevator is operated.

Monitoring and Recordkeeping Requirements

2.11 Operating Parameters

The following parameters shall be monitored and recorded. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

- Pressure drop across the baghouse, once daily when the grain elevator is operating.
- Barley throughput in tons per month and tons per any consecutive 12-month period. Annual throughput shall be determined by summing monthly throughput over the previous consecutive 12-month period.

2.12 Reasonable Control Measures

The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

2.13 Visible Emissions Monitoring

The permittee shall conduct a monthly inspection of visible emissions from the barley processing operations baghouse stack during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation of visible emissions. If any visible emissions are present from the barley processing operations baghouse stack, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030414

Permittee:	Reed Barley Storage, LLC	Facility ID No. 053-00008	Date Issued:	October 25, 2004
Location:	Hazelton, Idaho			

visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030414

Permittee:	Reed Barley Storage LLC	Facility ID No. 053-00008	Date Issued:	October 25, 2004
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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. 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.
2. 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.
3. The permittee shall allow the director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. The director may require the permittee to develop a list of operation and maintenance procedures to be submitted to DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
7. 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 may, at its option, 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.

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

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030414

Permittee:	Reed Barley Storage LLC	Facility ID No. 053-00008	Date Issued:	October 25, 2004
Location:	Hazelton, Idaho			

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.

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.

8. 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.
9. In accordance with IDAPA 58.01.01.123, 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.