



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
Curt Fransen, Director

June 24, 2015

James Sheehy, Responsible Official
MillerCoors LLC
5 North 400 West
Burley, ID 83318

RE: Facility ID No. 031-00021, MillerCoors LLC, Burley
Final Permit Letter

Dear Mr. Sheehy:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2014.0044 Project 61453 to MillerCoors LLC located at Burley for increasing the receiving and shipping grain throughputs and replacing worn out equipment. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received November 28, 2014.

This permit is effective immediately and replaces PTC No. 0440-0021, issued on June 21, 1991. This permit does not release MillerCoors LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Twin Falls Regional Office, 650 Addison Ave. West, Suite 110, Twin Falls, ID 83301, Fax (208) 736-2194.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Regional Manager - Air Quality and Remediation, at (208) 737-3889 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 Darrin Pampaian at (208) 373-0502 or darrin.pampaian@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\drp

Permit No. P-2014.0044 PROJ 61453

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee MillerCoors LLC
Permit Number P-2014.0044
Project ID 61453
Facility ID 031-00021
Facility Location 5 North 400 West
Burley, ID 83318

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) 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; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) 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; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho 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. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued June 24, 2015



Darrin Pampajan, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is a modified permit to construct (PTC) for an existing barley elevator operation.

The applicant has proposed to:

- Increase the receiving capacity of the elevator from 20,000 bushels of barley per hour (500 tons per hour) to 30,000 bushels of barley per hour (750 tons per hour)
- Increase shipping capacity of the elevator from 10,000 bushels of barley per hour (250 tons per hour) to 20,000 bushels of barley per hour (500 tons per hour)

The current storage capacity of this facility is 9 million bushels. The storage capacity will not be increased as a result of this project.

In addition, the Applicant has proposed to replace worn out equipment at the facility as a result of this project.

1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.

1.3 This PTC replaces Permit to Construct No. 0440-0021, issued on June 21, 1991.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	<u>Grain Receiving Pit #1 (farm trucks or railcars), Headhouse and Grain Handling (including scalpers):</u> Manufacturer: N/A Model: N/A Manufacture Date: Early 1970's Modified Date: 2015	<u>MX1-DH02-DHE1 Baghouse:</u> Manufacturer: Donaldson Model: 226RFWH10 PM ₁₀ control efficiency: 99.4%
	<u>Grain Receiving Pit #2 (farm trucks) and Headhouse and Grain Handling (including cleaning string):</u> Manufacturer: N/A Model: N/A Manufacture Date: Early 1970's	<u>Pit #2 Baghouse:</u> Manufacturer: Donaldson Model: 226RFWH10 PM ₁₀ control efficiency: 99.4%
	<u>Headhouse and Grain Handling (including scalpers) and Pit #1 Grain Loadout:</u> Manufacturer: N/A Model: N/A Manufacture Date: Early 1970's Modified Date: 2015	<u>MX1-DH01-DHE1 Baghouse:</u> Manufacturer: Donaldson Model: 226RFWH10 PM ₁₀ control efficiency: 99.4%
	<u>Headhouse and Grain Handling (including scalpers), Headhouse and Grain Handling (including cleaning string), and Grain Loadout to railcars and trucks:</u> Manufacturer: N/A Model: N/A Manufacture Date: Early 1970's Modified Date: 2015	<u>MX1-DH03-DHE1 Baghouse:</u> Manufacturer: Donaldson Model: 226RFWH10 PM ₁₀ control efficiency: 99.4%

[6/24/2015]

2 Barley Storage Elevator

2.1 Process Description

MillerCoors LLC operates an existing barley storage elevator located four miles west of Burley, Idaho on Highway 30. The Burley facility includes a barley storage elevator and a seedhouse. The elevator receives barley from farmers in the area by truck or railcar, cleans it, stores it until needed, and then loads it on to railcars and trucks for shipping.

[6/24/2015]

2.2 Control Device Descriptions

Table 2.1 Barley Storage Elevator Description

Emissions Units / Processes	Control Devices	Emission Points
<u>Grain Receiving Pit #1 (farm trucks or railcars), Headhouse and Grain Handling (including scalpers):</u> Manufacturer: N/A Model: N/A Manufacture Date: Early 1970's Modified Date: 2015	<u>MX1-DH02-DHE1 Baghouse:</u> Manufacturer: Donaldson Model: 226RFWH10 PM ₁₀ control efficiency: 99.4%	MX1-DH02-DHE1 Baghouse exhaust
<u>Grain Receiving Pit #2 (farm trucks) and Headhouse and Grain Handling (including cleaning string):</u> Manufacturer: N/A Model: N/A Manufacture Date: Early 1970's	<u>Pit #2 Baghouse:</u> Manufacturer: Donaldson Model: 226RFWH10 PM ₁₀ control efficiency: 99.4%	Pit #2 Baghouse exhaust
<u>Headhouse and Grain Handling (including scalpers) and Pit #1 Grain Loadout:</u> Manufacturer: N/A Model: N/A Manufacture Date: Early 1970's Modified Date: 2015	<u>MX1-DH01-DHE1 Baghouse:</u> Manufacturer: Donaldson Model: 226RFWH10 PM ₁₀ control efficiency: 99.4%	MX1-DH01-DHE1 Baghouse exhaust
<u>Headhouse and Grain Handling (including scalpers), Headhouse and Grain Handling (including cleaning string), and Grain Loadout to railcars and trucks:</u> Manufacturer: N/A Model: N/A Manufacture Date: Early 1970's Modified Date: 2015	<u>MX1-DH03-DHE1 Baghouse:</u> Manufacturer: Donaldson Model: 226RFWH10 PM ₁₀ control efficiency: 99.4%	MX1-DH03-DHE1 Baghouse exhaust

[6/24/2015]

Emission Limits

2.3 Emission Limits

The emissions from the Grain Receiving – Unloading, Headhouse and Grain Handling, Grain storage, Grain Loadout for Shipping, and Seedhouse operations shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Barley Storage Elevator Emission Limits ^(a)

Source Description	PM ₁₀ ^(b)		PM _{2.5} ^(c)	
	lb/hr ^(d)	T/yr ^(e)	lb/hr ^(d)	T/yr ^(e)
Grain Receiving - Unloading	0.18	0.80	0.05	0.23
Headhouse and Grain Handling	0.14	0.62	0.04	0.18
Grain storage	3.35	14.66	0.58	2.56
Grain Loadout for Shipping	0.06	0.26	0.02	0.08
Seedhouse	0.37	1.64	0.07	0.31

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Particulate matter with an aerodynamic diameter less than or equal to a nominal two point five (2.5) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- d Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative. The lb/hr limit is a 24-hr average.
- e Tons per any consecutive 12-calendar month period.

[6/24/2015]

2.4 40 CFR 60, Subpart DD Exhaust Stack Emissions Limits

In accordance with 40 CFR 60.302 (b), no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:

- Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf).
- Exhibits greater than zero percent opacity.

[6/24/2015]

2.5 40 CFR 60, Subpart DD Fugitive Emissions Limits

In accordance with 40 CFR 60.302 (c), no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:

- Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.
- Any grain handling operation which exhibits greater than zero percent opacity.
- Any truck loading station which exhibits greater than 10 percent opacity.

[6/24/2015]

Operating Requirements

2.6 Grain Receiving Throughput Limits

The maximum amount of grain received at the facility shall not exceed:

- 510,000 bushels per day

[6/24/2015]

2.7 Grain Shipping Throughput Limits

The maximum amount of grain shipped at the facility shall not exceed:

- 340,000 bushels per day

[6/24/2015]

2.8 Baghouses

The permittee shall install and operate baghouses to control PM₁₀ and PM_{2.5} emissions from the Grain Receiving Pit #1 (farm trucks or railcars), Headhouse and Grain Handling (including scalpers), Grain Receiving Pit #2 (farm trucks) and Headhouse and Grain Handling (including cleaning string), Headhouse and Grain Handling (including scalpers) and Pit #1 Grain Loadout, and Headhouse and Grain Handling (including scalpers), Headhouse and Grain Handling (including cleaning string), and Grain Loadout to railcars and trucks operations.

[6/24/2015]

2.9 Baghouse/Filter System Procedures

Within 60 days of initial start-up, the permittee shall have developed a Baghouse/Filter System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from the Grain Receiving Pit #1 (farm trucks or railcars), Headhouse and Grain Handling (including scalpers), Grain Receiving Pit #2 (farm trucks) and Headhouse and Grain Handling (including cleaning string), Headhouse and Grain Handling (including scalpers) and Pit #1 Grain Loadout, and Headhouse and Grain Handling (including scalpers), Headhouse and Grain Handling (including cleaning string), and Grain Loadout to railcars and trucks operations. The Baghouse/Filter System Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse/Filter System Procedures document shall describe the procedures that will be followed to comply with the General Compliance General Provisions and shall contain requirements for daily see-no-see visible emissions inspections of the baghouse when operating. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse/Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at anytime. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The Permittee shall maintain records of the results of each baghouse/filter system inspections in accordance with the Record Keeping General Provision. The records shall include, but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);

- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse/Filter System Procedures document shall be submitted to DEQ at least 60 days prior to modification startup for review and comment and shall contain a certification by a responsible official. Any changes to the Baghouse/Filter System Procedures document shall be submitted within 15 days of the change.

The Baghouse/Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring and recordkeeping requirements specified in the Baghouse/Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[6/24/2015]

2.10 Maintenance and Operation of Baghouses

The permittee shall maintain and operate the baghouses on the Grain Receiving Pit #1 (farm trucks or railcars), Headhouse and Grain Handling (including scalpers), Grain Receiving Pit #2 (farm trucks) and Headhouse and Grain Handling (including cleaning string), Headhouse and Grain Handling (including scalpers) and Pit #1 Grain Loadout, and Headhouse and Grain Handling (including scalpers), Headhouse and Grain Handling (including cleaning string), and Grain Loadout to railcars and trucks operations according to the manufacturer's specifications and recommendations and the Baghouse Procedures document.

[6/24/2015]

Monitoring and Recordkeeping Requirements

2.11 Grain Receiving Throughput Monitoring

The permittee shall monitor and record daily grain receiving throughput to demonstrate compliance with the Grain Receiving Throughput Limits permit condition.

[6/24/2015]

2.12 Grain Shipping Monitoring Requirement

The permittee shall monitor and record daily grain shipping throughput to demonstrate compliance with the Grain Shipping Throughput Limits permit condition.

[6/24/2015]

Performance Test Methods and Procedures Requirements

2.13 40 CFR 60, Subpart DD Test Methods and Procedures

In accordance with 40 CFR 60.303 (a), in conducting the performance tests by the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup of the modified sources specified in Table 2.1 as required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b). Acceptable alternative methods and procedures are given in paragraph (c) of this section.

In accordance with 40 CFR 60.303 (b), the owner or operator shall determine compliance with the particulate matter standards in §60.302 as follows:

- Method 5 shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters.
- Method 2 shall be used to determine the ventilation volumetric flow rate.
- Method 9 and the procedures in §60.11 shall be used to determine opacity.

In accordance with 40 CFR 60.303 (c), The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:

- For Method 5, Method 17 may be used.

[6/24/2015]

NSPS Incorporation Requirements

2.14 Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart DD - Standards of Performance for Grain Elevators

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[6/24/2015]

3 General Provisions

General Compliance

3.1 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, 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.]

3.2 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.

[IDAPA 58.01.01.211, 5/1/94]

3.3 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

3.4 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, 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

3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- 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; and
- 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 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7** 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.
- 3.8** 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.
- 3.9** Within 60 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

- 3.10** The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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, 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

- 3.11** The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

3.12 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

3.13 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

3.14 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

3.15 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

3.16 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]