Statement of Basis

Permit to Construct No. P-2013.0047
Project ID 61246

Pacific Northwest Farmers Co-op Inc
Lewiston, Idaho

Facility ID 069-00011

Draft for Facility Review

CZ

September 18, 2013
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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.

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE **3**
FACILITY INFORMATION **4**
Description 4
Permitting History 4
Application Scope 4
Application Chronology 4
TECHNICAL ANALYSIS **5**
Emissions Units and Control Equipment 5
Emissions Inventories 5
Ambient Air Quality Impact Analyses 5
REGULATORY ANALYSIS **5**
Attainment Designation (40 CFR 81.313) 5
Facility Classification 5
Permit to Construct (IDAPA 58.01.01.201) 6
Tier II Operating Permit (IDAPA 58.01.01.401) 6
Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70) 6
PSD Classification (40 CFR 52.21) 6
NSPS Applicability (40 CFR 60) 6
NESHAP Applicability (40 CFR 61) 6
MACT Applicability (40 CFR 63) 6
Permit Conditions Review 6
PUBLIC REVIEW **10**
Public Comment Opportunity 10
APPENDIX A – PROCESSING FEE

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

CFR	Code of Federal Regulations
CMS	continuous monitoring systems
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
MACT	Maximum Achievable Control Technology
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
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
PTE	potential to emit
Rules	*Rules for the Control of Air Pollution in Idaho*
SO_2	sulfur dioxide
T/day	tons per calendar day
T/yr	tons per consecutive 12 calendar month period
VOC	volatile organic compounds

FACILITY INFORMATION

Description

Pacific Northwest Farmers Cooperative operates a grain cleaning operation at 1422 3rd Avenue North in Lewiston, Idaho on land leased from Lewis-Clark Terminal. The grain cleaning operation consists of receiving pea and/or lentils by truck or rail and off-loading at the truck dump (EU#2), cleaning the grains in a Delta 107 cleaner manufactured by Cimbria Manufacturing A/S (EU#1), transferring the grains to one of two steel storage bins (EU#3), packaging the grains indoors, and transporting the packaged grains off-site by truck or rail.

Permitting History

This is the initial PTC for a new facility. This PTC is based on the pea and lentil section of Permit to Construct No. P-2012.0027, issued on September 22, 2004, which was replaced by Permit to Construct No. P-2013.0039. The Lewis Clark facility (P-2013.0039) sold the pea and lentil portion of their facility to Pacific Northwest Farmers Cooperative. The Pacific Northwest Farmers Cooperative is now applying for a PTC for the pea and lentil portion, so that section of the old permit is being used as a basis for this new permit.

Application Scope

This permit is the initial PTC for this facility.

The applicant has proposed to operate a pea and lentil cleaning facility.

Application Chronology

August 5, 2013	DEQ received an application
August 6, 2013	DEQ received an application fee.
August 21, 2013	DEQ received supplemental information from the applicant.
August 23, 2013	DEQ determined that the application was complete.
August 23, 2013	DEQ made available the draft permit and statement of basis for peer and regional office review.
September 4, 2013	DEQ made available the draft permit and statement of basis for applicant review.
September 12, 2013	DEQ received the permit processing fee.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 Emissions Unit and Control Equipment Information

Sources	Control Equipment
Cleaner: Manufacturer: Cimbria Manufacturing A/S Type: Delta Super 107 Grain Cleaner Max. production: 480 T/day	Baghouse: Manufacturer: Kice Type: Durapex™ 10.5 ounce per cubic yard PET fabric filter bags PM_{10} control efficiency: 99.8%
Receiving	None
Transfer conveyors	
Storage silos	

Emissions Inventories

Emissions from the cleaner are controlled by a Kice Baghouse, rated for 99.8% PM_{10} control with Durapex™ 10.5 ounce per cubic yard PET fabric filter bags.

The facility will process up to 30 tons per hour (limited to 41,600 tons annually) on a maximum production schedule of 16 hours per days, 5 days per week, 52 weeks per year. Uncontrolled emissions may occur at the receiving station (truck dump), transfer conveyors, cleaner, storage silos, and traffic on unpaved roads (receiving and shipping). All product is placed in packages before it is shipped from the site. Therefore, fugitive emissions due to shipping are not anticipated. Shipping is performed by truck or rail.

Because there is no increase in production, and the equipment is the same as in the previous permit, no emissions inventory analysis is included in this SOB.

Ambient Air Quality Impact Analyses

Because there is no increase in emissions, no modeling analysis is required.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Nez Perce County, which is designated as attainment or unclassifiable for $PM_{2.5}$, PM_{10}, SO_2, NO_2, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

"Synthetic Minor" classification for criteria pollutants is defined as the uncontrolled Potential to Emit for criteria pollutants are above the applicable major source thresholds and the Potential to Emit for criteria pollutants fall below the applicable major source thresholds.

Based on the emission inventory in the application and the fact that all emissions are uncontrolled except those emissions going to the baghouse, a back-calculation was done on the baghouse. Emissions are estimated to be 0.078 T/yr based on AP-42 factors, and the control efficiency for the baghouse is 99.8%. Therefore, the uncontrolled emissions of PM_{10} are estimated to be 39 T/yr. The cumulative emissions of PM_{10} are 2.2 T/yr, so the emissions of PM_{10} are less than the major source threshold for uncontrolled and controlled PTE. Therefore, the source is not a synthetic minor facility. It is a true minor facility.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 .....Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the pea and lentil facility. 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.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301 .....Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM_{10}, SO_2, NO_x, CO, VOC, and HAP or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 .....Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is/is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements 40 CFR Part 60. Subpart DD could apply, but that subpart is for grain, and grain is defined as "corn, wheat, sorghum, rice, rye, oats, barley, and soybeans." Peas and lentils are not on the list, so this subpart does not apply.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

The facility is not subject to any MACT standards in 40 CFR Part 63.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

New Permit Condition

The opacity permit condition has been updated to the current regulatory language, as follows:

Emissions from the pea and lentil cleaning operation stack, or any other stack, vent, or functionally equivalent opening associated with the pea and lentil cleaning operation, 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.

New Permit Condition

The permittee shall use the Delta 107 baghouse to control emissions from the grain cleaner.

Revised Permit Condition

The fugitive dust rule has been updated in the permit to match current regulatory language.

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne. In determining what is reasonable, consideration 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 of Water or Chemicals. 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 of Dust Suppressants. 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.
- Use of Control Equipment. 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 of Trucks. Covering, when practical, open bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving. Paving of roadways and their maintenance in a clean condition, where practical.
- Removal of Materials. Prompt removal of earth or other stored material from streets, where practical.

The annual throughput limit has been reworded to clarify that the annual ton per year limit is a monthly rolling average by specifying that the limit applies to "any consecutive 12-month period."

The permit conditions from the previous permit with numerical limits on the particulate emissions have been replaced by a permit condition that requires maintenance of the baghouse, as follows:

New Permit Condition

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 Delta 107 Baghouse. 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 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.*

New Permit Condition

The Permittee shall maintain records of the results of each baghouse/filter system inspections in accordance with the general provisions in this permit. 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 remain on site at all times and shall be made available to DEQ representatives upon request.

All requirements for maintaining records have been replaced by a condition in the general provisions.

Four permit conditions were added to the monitoring and recordkeeping section in order to track the emissions and operating limits in the permit.

Initial Permit Condition

Opacity Monitoring

The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions, when the facility is in operation, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) 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%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.

Initial Permit Condition

Record and Maintain Records of Pressure Drop

The permittee shall record and maintain records of the pressure drop for the Delta 107 baghouse once per day when operating.

Initial Permit Condition

Fugitive Dust Monitoring

The permittee shall conduct monthly facility-wide inspections of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust 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 dust emission 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 dust emissions were present (if observed), any corrective action taken in response to the fugitive dust emissions, and the date the corrective action was taken. A compilation of the most recent five years of records shall be kept onsite and made available to DEQ representatives upon request.

Initial Permit Condition

Throughput Monitoring

The permittee shall monitor and record in tons the process rate of material through the cleaner once per day to demonstrate compliance with the daily limit. The daily process rate data shall be summed once per month to demonstrate compliance with the consecutive 12-month throughput permit limit.

Initial Permit Condition 3.1

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

Initial Permit Condition 3.2

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 3.3

The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

Initial Permit Condition 3.4

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

Initial Permit Condition 3.5

The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

Initial Permit Condition 3.6

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

Initial Permit Condition 3.7

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

Initial Permit Condition 3.8

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

Initial Permit Condition 3.9

The performance test report provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

Initial Permit Condition 3.10

The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 3.11

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

Initial Permit Condition 3.12

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

Initial Permit Condition 3.13

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

Initial Permit Condition 3.14

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

Initial Permit Condition 3.15

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

Initial Permit Condition 3.16

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

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.

APPENDIX A – PROCESSING FEE

PTC Fee Calculation

Instructions:
Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: Pacific Northwest Farmers Co-op Inc.
Address: 1433 3rd Avenue N.
City: Lewiston
State: ID
Zip Code: 83501
Facility Contact: Keith Becker
Title: Operations Manager
AIRS No.: 069-00011

N — Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

Y — Did this permit require engineering analysis? Y/N

N — Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO_x	0.0	0	0.0
SO_2	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	0.0	0	**0.0**
Fee Due	**$ 1,000.00**		

Comments: