

Air Quality


PERMIT TO CONSTRUCT

Permittee Highland Milling, LLC
Permit Number P-2023.0048
Project ID 63216
Facility ID 029-00032
Facility Location 161 West 2nd Street North
Bancroft, Idaho 83217

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 November 21, 2023



Rakael Pope, Permit Writer



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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) to update the permittee name to the facility's current owner, Highland Milling LLC.
- 1.2 This PTC replaces Permit to Construct No. P-029-00032, issued on August 18, 1999.

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	Grain Mill	3 Cyclones

2 Building Roof Vents and Cyclone Stacks

2.1 Process Description

The facility is a grain milling facility which cleans and processes oats, rye, and barley.

2.2 Control Device Descriptions

Table 2.1 Building Roof Vents and Stacks Description

Emissions Units / Processes	Control Devices	Emission Points
Building Roof Vents and Stacks	3 Cyclones	Roof Vents and Cyclone Stacks

Emission Limits

2.3 Emission Limits

The emissions from the building roof vents must not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Building Roof Vents Emission Limits^(a)

Source Description	PM	
	lb/hr	T/yr ^(b)
Building Roof Vents	9.1	40

- a) As determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or as determined by DEQ's emission estimation methods used in this permit analysis.
- b) Tons per any consecutive 12-calendar month period as determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process may operate, or by actual annual production rates.

2.4 Opacity Limit

Emissions from the building roof vent, or any other stack, vent, or functionally equivalent opening associated with the grain milling facility, must 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 must be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.5 Process and Monitoring Equipment

The permittee must install, maintain, and operate three cyclones in accordance with manufacturer's specifications. The permittee must install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure differential across each of the three cyclones.

2.6 Operations and Maintenance Manual (O&M) Requirement

Within sixty days after startup, the permittee must have developed an Operations and Maintenance (O&M) Manual for the cyclones which describes the procedures that will be followed to comply with General Provisions and manufacturer's specifications. This manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.7 Pressure Drop Across the Cyclones

The pressure drop across each of the three cyclones must be maintained within the manufacturer's and O&M Manual's specifications. Documentation of both the manufacturer's and O&M Manual's operating pressure drop specifications must remain on-site at all times and must be made available to DEQ representatives upon request.

2.8 Reasonable Control of Fugitive Emissions

All reasonable precautions must be taken to prevent particulate matter from becoming airborne as required in IDAPA 58.01.01.651. 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 which might affect the movement of particulate matter. 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; or
- Prompt removal of earth or other stored material from streets, where practical.

Monitoring and Recordkeeping Requirements

2.9 Monitoring Operating Parameters

The Permittee must monitor and record in a log on a monthly basis, during any calendar month the facility is operating, the pressure drop across each of the three cyclones. The most recent two (2) years compilation of data must be kept on-site, in a log, and must be made available to DEQ representatives upon request.

2.10 Reasonable Fugitive Emission Control Measures

The Permittee must monitor and record in a log, during operation, the periodic methods used to reasonably control fugitive emissions as required by this permit. The log must include the type of control used as well as the circumstances under which no controls are used. The most recent two (2) years' compilation of data must be kept on-site and must be made available to DEQ representatives upon request.

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 must 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, must 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 must 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]

3.3 Receiving a permit to construct, a Tier I operating permit, a Tier II operating permit, a Permit by Rule, or a Certificate of Registration for portable equipment does not relieve any owner or operator of the responsibility to comply with all applicable local, state and federal statutes, rules and regulations.

[IDAPA 58.01.01.108]

Inspection and Entry

3.4 Upon presentation of credentials, the permittee must 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 The Department may cancel a permit to construct if the construction is not begun within two (2) years from the date of issuance, or if during the construction, work is suspended for one (1) year.

[IDAPA 58.01.01.211.02]

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

[IDAPA 58.01.01.211.01]

- 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 (15) days after such date.

[IDAPA 58.01.01.211.03]

Performance Testing

3.7 If performance testing (air emissions source test) is required by this permit, the permittee must 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 must 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 must include a description of the test method(s) to be used, an explanation of any unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

3.9 Within 60 days of the completion of field sample collection for the performance test required by this permit, the permittee must submit to DEQ a performance test report. The report must 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]

Monitoring and Recordkeeping

3.10 The permittee must maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records must 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 must 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 must be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211]

Excess Emissions

3.11 The permittee must comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 must govern in the event of conflicts between the excess emissions general provisions and the regulations of IDAPA 58.01.01.130-136.

During an excess emissions event, the permittee must, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and must, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132]

3.12 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the permittee must demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

- Ensure that no scheduled startup, shutdown, or maintenance resulting in excess emissions occurs during any period in which an Air Quality Advisory has been declared by DEQ.
- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the permittee demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
- Reporting and recording the information required pursuant to the excess emissions reporting and recordkeeping requirements and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133]

3.13 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the permittee must demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

- Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
- Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification must identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification must be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
- Report and record the information required pursuant to the excess emissions reporting and recordkeeping facility wide conditions and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
- During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ must be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

[IDAPA 58.01.01.134]

3.14 The permittee must submit a written report to DEQ for each excess emissions event, no later than 15 days after the beginning of such an event. Each report must contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135]

3.15 The permittee must maintain excess emissions records at the facility for the most recent five calendar-year period. The excess emissions records must all be made available to DEQ upon request and must include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

- An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and
- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the permittee in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136]

Certification

3.16 All documents submitted to DEQ including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification must contain a certification by a responsible official. The certification must 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]

False Statements

3.17 No person must 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]

Tampering

3.18 Persons are prohibited from knowingly interfering with any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126]

Transferability

3.19 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.05.

[IDAPA 58.01.01.209.05]

Severability

3.20 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, must not be affected thereby.

[IDAPA 58.01.01.211]