STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 N Hilton Street, Boise, ID 83706
(208) 373-0502

Brad Little, Governor
Jess Byrne, Director

December 15, 2021

James Burgum, CEO
The Arthur Companies – Blackfoot
1350 Parkway Drive #23
Blackfoot, ID 83221

RE: Facility ID No. 011-00028, Project No. 62756, The Arthur Companies – Blackfoot
Transfer of Ownership by Permit to Construct Revision

Dear Mr. Burgum:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2012.0017, Project 62756, to The Arthur Companies – Blackfoot, located in Blackfoot for a transfer of ownership. This PTC is issued in accordance with IDAPA 58.01.01.209.04 of the Rules for the Control of Air Pollution in Idaho and is based on the certified information received on December 1, 2021. The transfer of ownership is based on the following information:

Previous Permittee Information

Permittee:	AgSpring Idaho LLC, Blackfoot
Mailing Address:	467 West Highway 26, Blackfoot, ID 83221
Facility Location:	467 West Highway 26, Blackfoot, ID 83221
Facility Contact:	Trent Nilsson
Phone Number:	(208) 785-4460
E-mail Address:	tnilsson@thresherwheat.com
Responsible Official:	Rudy deWit, Director of Idaho Food Safety
Phone Number:	(208) 785-4460

Updated Permittee Information

Permittee:	The Arthur Companies – Blackfoot
Mailing Address:	1350 Parkway Drive #23, Blackfoot, ID 83221
Facility Location:	467 West Highway 26, Blackfoot, ID 83221
Facility Contact:	Max Mobley, General Manager
Phone Number:	(620) 664-7734
E-mail Address:	mmobley@thresherwheat.com
Responsible Official:	James Burgum, CEO
Phone Number:	(701) 997-6115

This permit is effective immediately and replaces PTC No. P-2012.0017, Project 61574 issued January 4, 2016. This permit does not release The Arthur Companies – Blackfoot from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Melissa Gibbs, Regional Air Quality Manager, at (208) 236-6160 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.

If you have any questions, please contact Morrie Lewis at (208) 373-0495 or Morrie.Lewis@deq.idaho.gov.

Sincerely,



Mike Simon
Stationary Source Bureau Chief
Air Quality Division

MS/ml

Enclosure

Permit No. P-2012.0017 PROJ 62756

Air Quality

PERMIT TO CONSTRUCT

Permittee	The Arthur Companies - Blackfoot
Permit Number	P-2012.0017
Project ID	62756
Facility ID	011-00028
Facility Location	467 West Highway 26 Blackfoot, Idaho 83221

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 December 15, 2021

Morrie Lewis, Permit Writer

Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is a revised permit to construct (PTC) for a transfer in ownership.

[12/15/2021]

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.

[12/15/2021]

1.3 This PTC replaces Permit to Construct No. P-2012.0017, which was issued on January 4, 2016.

[12/15/2021]

Regulated Sources

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

Table 1.1 Regulated Sources

Source	Control Equipment
Grain Elevator: Maximum annual production rate: 720,000 T/12-months	Baghouse
Grain Conditioning Facility: Maximum daily production rate: 1,000 T/day Maximum annual production rate: 365,000 T/12-months	Baghouses (2 total) Each screener separator includes a cyclone (2 total). Each cyclone is vented to one baghouse.

2 Grain Storage and Grain Conditioning

2.1 Process Description

This permit is for a grain storage and grain conditioning facility. The grain conditioning facility processes (cleans) wheat stored in the adjacent grain elevator. The installed equipment includes: aspirators; screens; storage bins; elevators; conveying systems; and receiving, storage, and loadout equipment. Ventilation systems with filters and cyclone units are used to control particulate emissions from the process equipment. The cyclone units are vented to the baghouses, which in turn are vented inside the grain conditioning building which is open to the atmosphere through a large covered opening located near the top level on the north and west side of the building.

Emission Limits

2.2 Grain Elevator Baghouse

Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM_{10}) emissions from the grain elevator emission control equipment shall not exceed 0.01 grains per dry standard cubic foot in accordance with 40 CFR 60.302(b)(1) and shall not exceed 11.52 pounds per day (lb/day) of PM_{10} and 2.10 tons per any consecutive 12-month period (T/12-months) of PM_{10}.

2.3 Grain Conditioning Facility Emissions

Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM_{10}) emissions from the grain conditioning facility shall not exceed 47.23 pounds per day (lb/day) of PM_{10} and 8.62 tons per any consecutive 12-month period (T/12-months) of PM_{10}.

Particulate matter with an aerodynamic diameter less than or equal to a nominal two point five micrometers ($PM_{2.5}$) emissions from the grain conditioning facility shall not exceed 0.82 lb/day of $PM_{2.5}$ and 0.15 T/12-months of $PM_{2.5}$.

2.4 Opacity Limit

2.4.1 Grain Conditioning Building

Emissions emanating from the grain conditioning building vents shall not exceed zero percent (0%) opacity as required in 40 CFR 60.302(b)(2).

2.4.2 Grain Loading and Unloading

Emissions emanating from the rail car unloading/loading, truck dump Pit A and truck dump Pit D, shall not exceed five percent (5%) opacity as required in 40 CFR 60.302(c)(1). Belt dump trucks may only be used if one or both doors on the truck dump Pit A and truck dump Pit D are closed.

2.4.3 Grain Handling

Emissions emanating from the grain Handling Leg 1, Leg 2, Leg 4, and storage bins 15, 16, 17, and 18 shall not exceed zero percent (0%) opacity as required in 40 CFR 60.302(c)(2).

2.4.4 Visible Emissions

Emissions emanating from any stack, vent, or other functionally equivalent opening, shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any 60-minute period as required in IDAPA 58.01.01.625 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.5 Grain Elevator Throughput

The feed rate to the grain elevator shall not exceed a maximum of seven hundred twenty thousand tons per any consecutive 12-month period (720,000 T/12-months).

2.6 Grain Conditioning Throughput

The feed rate to the grain conditioning facility shall not exceed a maximum of one thousand tons per day (1,000 T/day) and a maximum of three hundred sixty-five thousand tons per consecutive 12-month period (365,000 T/12-months).

2.7 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne as required in IDAPA 58.01.01.651. 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 and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

2.7.1 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;

2.7.2 Application, where practical, of asphalt, water, or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust;

2.7.3 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;

2.7.4 Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;

2.7.5 Paving of roadways and their maintenance in a clean condition, where practical; or

2.7.6 Prompt removal of earth or other stored material from streets, where practical.

2.8 Grain Elevator & Grain Conditioning Particulate Filters

2.8.1 The permittee shall install, calibrate, maintain, and operate, in accordance with the manufacturer’s specifications, equipment to continuously measure the pressure differential across the particulate filters.

2.8.2 The pressure drop across the particulate filters shall be maintained within the manufacturer’s and the Operations and Maintenance (O&M) Manual's specifications. Documentation of both the manufacturer’s and O&M Manual's operating pressure drop specifications shall remain on-site at all times and shall be made available to DEQ representatives upon request.

2.9 Operations and Maintenance Manual Requirements

The permittee shall maintain an O&M Manual for the air pollution control equipment which describes the procedures that will be followed to comply with General Provision 3.2 and the air pollution control equipment requirements in this permit. The manual shall remain on-site at all times and shall be available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

2.10 Grain Elevator Throughput

The permittee shall monitor and record the amount of feed to the grain elevator facility in tons per month (T/month) and tons per any consecutive 12-month period (T/12-months). The records shall be maintained in accordance with General Provision 3.10 of this permit.

2.11 Grain Conditioning Throughput

The permittee shall monitor and record the amount of feed to the grain conditioning facility in tons per day (T/day) and tons per any consecutive 12-month period (T/12-months). The records shall be maintained in accordance with General Provision 3.10 of this permit.

2.12 Pressure Drop

The pressure drop across the particulate filters shall be monitored and recorded once on a weekly basis. The records shall be maintained in accordance with General Provision 3.10 of this permit.

2.13 Fugitive Dust Log

The permittee shall maintain a log of all fugitive dust complaints received. The validity of the complaints shall be assessed, and this assessment and any corrective action will be recorded in a log. The records shall be maintained in accordance with General Provision 3.10 of this permit.

2.14 Periodic Fugitive Dust Inspection

The permittee shall conduct a weekly 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.

2.15 Periodic Visible Emissions Inspection

The permittee shall conduct a weekly facility wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions to demonstrate compliance with Permit Condition 2.4.4 The visible emissions 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:

1. 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 emission point in question. If the visible emissions are not eliminated, the permittee shall comply with item 2, below; or
2. 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 action and report the excess in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emissions inspection or opacity test and when the inspection was conducted. The records shall include, at a minimum, the date and results of each inspection 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.

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, 5/1/1994]

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; 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, 5/1/1994]

- 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.

[IDAPA 58.01.01.211.03, 5/1/1994]

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 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, 4/5/2000 and 4/11/2015]

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, 5/1/1994]

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, 4/5/2000]

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, 5/1/1994]

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, 3/23/1998]

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, 3/23/1998]

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, 4/11/2006]

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, 5/1/1994]