



Air Quality Permitting Statement of Basis

December 8, 2005

Permit to Construct No. P-050504

**Busch Agricultural Resources, Inc. Grain Elevator
Idaho Falls, ID**

Facility ID No. 019-00028

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AIR QUALITY DIVISION

KH

FINAL PERMIT

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Acronyms, Units, and Chemical Nomenclatures

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
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
m	meter(s)
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 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
scf	standard cubic feet
SIC	Standard Industrial Classification
SM	Synthetic Minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

2. FACILITY DESCRIPTION

Busch Agricultural Resources, Inc. (BARI) operates a grain elevator near Idaho Falls, ID. The grain elevator has a total storage capacity of approximately 4.0 million bushels. The maximum conveying capacity at the facility is 10,000 bushels per hour (b/hr). Refer to the June 10, 2002 Technical Memorandum for PTC No. 019-00028 for a more complete description of the facility.

3. FACILITY / AREA CLASSIFICATION

The following facility, area and AIRS classifications for the facility are unchanged by this permit revision. The elevator is classified under Standard Industrial Code 5153, Grain Elevator Operations. The elevator is a synthetic minor source. The facility is classified as a "SM" facility because the potential emissions are greater than 100 T/yr, but the actual emissions are limited to less than 100 T/yr.

The grain elevator is located within Bonneville County in the west-central portion of the Idaho Falls regional district. Bonneville County is designated as an unclassifiable area for all regulated criteria air pollutants. The grain elevator is located in Air Quality Control Region 61 and Zone 12.

4. APPLICATION SCOPE

BARI has submitted information to EPA Region 10 and requested concurrence with BARI's determination that this facility is not subject to 40 CFR 60 Subpart DD, *Standards of Performance for Grain Elevators*. It is anticipated that EPA may approve this request. Therefore, the purpose for this PTC revision is to write the NSPS permit provisions to accommodate EPA's applicability determination.

4.1 Application Chronology

June 28, 2005	DEQ received the PTC application
July 18, 2005	The application was determined to be incomplete
August 2, 2005	BARI requested an NSPS applicability decision from EPA
August 22, 2005	DEQ received the PTC application fee from BARI
October 21, 2005	A draft PTC was issued to BARI for review
October 25, 2005	DEQ received comments from BARI on the draft PTC

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC action.:

5.1 Equipment Listing

The equipment at this facility is not changed by this permit revision.

5.2 Emissions Inventory

There will be no increase in emissions as a result of this permit revision.

5.3 Modeling

Modeling is not required for this permit revision since there is no increase in emissions as a result of this permit revision.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.201..... Permit to Construct Required

BARI has requested PTC changes to clarify the applicability of the NSPS provisions under 40 CFR 60 Subpart DD.

IDAPA 58.01.01.209.04..... Revisions of Permits to Construct

This permit action is a revision to allow for EPA's NSPS applicability determination. The facility will continue to meet the requirements of IDAPA 58.01.01.200-228 since no other changes have been made. The opportunity for public comment requirements under IDAPA 58.01.01.209.01.c do not apply since there will be no increase in emissions authorized by this revised permit.

5.5 Permit Conditions Review

This section describes only those permit conditions that have been revised, modified or deleted as a result of this permit action. All other permit conditions remain unchanged.

PTC Condition 1.3 of the June 18, 2002 PTC

The visible fugitive emissions requirement was deleted. This condition replaced by the new requirement to maintain and follow a fugitive dust control plan for purposes of complying with IDAPA 58.01.01.651.

PTC Conditions 2.1, 2.3, 2.4, 6.1, 6.2, 6.3, 6.4, and 7

Each of these permit conditions pertains to the requirements specified under 40 CFR 60 Subpart DD, *Standards of Performance for Grain Elevators*. To clarify the applicability of these requirements, the following statement was added to each of these permit conditions: "If EPA determines that 40 CFR 60 Subpart DD does not apply to this facility, then a copy of the determination shall be maintained on-site, and the permittee is not required to comply with this permit condition."

PTC Conditions 3.2, 3.3, and 4.1

Condition 4.1 of the June 18, 2002 PTC was deleted since the requirement to submit an O&M manual has been fulfilled, and Condition 3.2 was also changed accordingly. In Condition 3.3, the requirements for maintaining the manual were deleted since this already included Condition 3.2.

PTC Condition 3.3.2 of the June 18, 2002 PTC

Upon review, it was determined that Permit Condition 3.3.2 of PTC No. 019-00028 issued on June 18, 2002 was intended to address compliance with Permit Condition 1.4 of that permit. Condition 1.4 specifies the NSPS fugitive emission standards set forth in 40 CFR 60.302(c). However, compliance with 60.302(c) is more appropriately addressed by 40 CFR 60.303(b) which states that "... the procedures in 60.11 shall be used to determine opacity." In turn, 60.11 sets forth requirements for initial opacity tests. BARI completed the initial NSPS performance/opacity tests on April 28-30, 2004, therefore, Permit Condition 3.3.2 of PTC No. 019-00028 issued on June 18 is no longer necessary and it was deleted from the permit.

PTC Condition 3.4

The requirements for developing, maintaining and implementing a fugitive dust control plan were added to the permit for purposes of maintaining compliance with the fugitive dust rules under IDAPA 58.01.01.651.

PTC Conditions 6.2.1, 6.2.2 and 6.3.2

In Conditions 6.2.1 and 6.2.2, the phrase "... Within 60 days after achieving the maximum production rate at which the source will operate, but not later than 180 days after the initial startup of the new or modified source" was replaced by the phrase "... When required by the EPA Administrator under 40 CFR 60.8". Since BARI completed the initial NSPS performance tests on April 28-30, 2004, the only remaining test requirement under 40 CFR 60.8(a) is "...at such other times as may be required by the Administrator under Section 114 of the Act...". In Condition 6.3.2, the reference to "40 CFR 60" was changed to "40 CFR 60.8" to make this requirement more clear.

PTC General Provisions

The most recent version of the PTC General Provisions was used. In particular, note that the maximum allowable operating rate(s) is no longer limited to 120% of the operating rate during any performance test.

6. PERMIT FEES

The PTC application fee of \$1000.00 was received on August 22, 2005 and the PTC processing fee of \$250.00 was received on November 30, 2005. The PTC processing fee for this revision is \$250.00 since this is a permit modification where no engineering analysis is required. There is no change in emissions associated with this permit revision (see Table 5.1).

Table 5.1 PTC PROCESSING FEE TABLE

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
PM ₁₀	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	\$ 250.00		

7. PERMIT REVIEW

7.1 *Regional Review of Draft Permit*

The PTC was forwarded to the DEQ Idaho Falls Regional Office for review on September 2, 2005. No changes were requested.

7.2 *Facility Review of Draft Permit*

A draft PTC and Statement of Basis were issued to BARI for review on October 21, 2005. Comments were received from BARI on October 25, 2005 and addressed as follows:

Information was provided to show why Permit Condition 4.3.2 should be removed from the permit. Upon subsequent review Condition 4.3.2 was removed. See the "Permit Conditions Review" section above for details.

7.3 *Public Comment*

An opportunity for public comment is not required for this permit revision since there it will not result in an increase in emissions in accordance with IDAPA 58.01.01.209.04.

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that Busch Agricultural Resources, Inc. be issued final PTC No. P-050504 for the Idaho Falls Grain Elevator. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

KH/sd Permit No. P-050504

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