



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
Toni Hardesty, Director

February 18, 2005

**Certified Mail No. 7000 0520 0016 0850 4639**

Ron Parks  
Environmental Manager  
Double J Milling LLC  
1301 Hwy 67  
Grandview, ID 83624

RE: Facility ID No. 039-00021, Double J Milling LLC, Mt. Home  
Final Permit Letter

Dear Mr. Parks:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-040047 for Double J Milling LLC in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho). This permit is effective immediately and is based on your permit application received on December 21, 2004.

This permit does not release Double J Milling LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact Tom Krinke of the Boise Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations 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 call Bill Rogers at (208) 373-0437 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/CZ/sd  
Enclosures

Permit No. P-040047



**Air Quality**  
**PERMIT TO CONSTRUCT**  
**State of Idaho**  
**Department of Environmental Quality**

**PERMIT No.:** P-040047  
**FACILITY ID No.:** 039-00021  
**AQCR:** 63                      **CLASS:** B  
**SIC:** 5153                      **ZONE:** 11  
**UTM COORDINATE (km):** 603.2, 4779.1

**1. PERMITTEE**  
Double J Milling LLC

**2. PROJECT**  
Grain rolling mill – Permit Revision

**3. MAILING ADDRESS**  
1301 Hwy 67

**CITY**  
Grandview

**STATE ID**

**ZIP**  
83624

**4. FACILITY CONTACT**  
Ron Parks

**TITLE**  
Environmental manager

**TELEPHONE**  
(208) 455-4834

**5. RESPONSIBLE OFFICIAL**  
Ron Parks

**TITLE**  
Environmental manager

**TELEPHONE**  
(208) 455-4834

**6. EXACT PLANT LOCATION**  
State Highway Business 84, one mile northwest of Mountain Home

**COUNTY**  
Elmore

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Grain elevator and rolling mill

**8. GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and 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.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the 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.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

  
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TONI HARDESTY, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:** February 18, 2005

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## Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr/ dscf	grain (1 lb = 7,000 grains) per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
MMBtu/hr	million British thermal units per hour
NO <sub>x</sub>	nitrogen oxides
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040047**

<b>Permittee:</b>	Double J Milling LLC	<b>Facility ID No.:</b> 039-00021	<b>Date Issued:</b>	February 18, 2005
<b>Location:</b>	Mountain Home, Idaho			

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

- This PTC is a revision of the facility's existing permit. This permit revision is a facility name change.
- This PTC replaces PTC No. P-030048, issued May 7, 2004, the terms and conditions of which shall no longer apply.

***Regulated Sources***

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

**Table 1.1 REGULATED EMISSIONS SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	Grain elevator equipment	Baghouse
3	Two Boilers Natural gas 32.4 MMBtu/hr each Low NO <sub>x</sub> burners	None
4	Grain rolling mill, including: <ul style="list-style-type: none"> <li>• Two 18,000 bushel staging bins</li> <li>• Four wet/hot flake airlift high-efficiency cyclones</li> <li>• Cooling process</li> <li>• Cleaner fines airlift high-efficiency cyclone</li> </ul>	Two cooling fans, high-efficiency cyclones for cooling process

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**2. GRAIN ELEVATOR EQUIPMENT**

***Emission Limits***

**2.1 Opacity Limit**

Emissions from the baghouse stack, or any other stack, vent, or functionally equivalent opening associated with the grain elevator, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 16.01.01.625.

**2.2 Property Boundary Visible Emissions Limit**

Visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by EPA Reference Method 22, as described in 40 CFR 60, Appendix A, or DEQ-approved alternative method.

***Operating Requirements***

**2.3 Monitoring Equipment**

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

**2.4 Baghouse Pressure Drop**

The pressure drop across the baghouse shall be maintained within manufacturer's and Operation and Maintenance (O&M) Manual specifications. Documentation of the operating pressure drop specifications for the baghouse shall remain on site at all times and shall be made available to DEQ representatives upon request.

**2.5 Operations and Maintenance Manual Requirements**

Within 60 days after startup, the permittee shall have developed an O&M Manual for the baghouse which describes the procedures that will be followed to comply with General Provision 2 and the manufacturer's air pollution control device specifications. This manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

**2.6 Reasonable Control of Fugitive Emissions**

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne as required in IDAPA 16.01.01.651. 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;

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- 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***

**2.7 Monitor Operating Parameters**

The permittee shall monitor and record the pressure drop across the baghouse on a weekly basis to demonstrate compliance with Permit Condition 2.4. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

***Reporting Requirements***

**2.8 Certification of Documents**

All documents including, but not limited to, application forms for Permits to Construct, monitoring data, supporting information, requests for confidential treatment, testing reports, and compliance certifications submitted to DEQ 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.

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**3. BOILERS**

**3.1 Process Description**

Boilers No. 1 and No. 2 provide process steam for the grain roller mill.

**3.2 Emissions Control Description**

Emissions from the boilers are uncontrolled.

***Emissions Limits***

**3.3 Grain Loading Limit**

The permittee shall not discharge to the atmosphere from the Boiler No. 1 stack or the Boiler No. 2 stack, PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas.

**3.4 Opacity Limit**

Emissions from the Boiler No. 1 stack and emissions from the Boiler No. 2 stack, or any other stack, vent, or functionally equivalent opening associated with the boilers, 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.

**3.5 Natural Gas Throughput Limit**

The combined amount of natural gas combusted in Boiler No. 1 and Boiler No. 2 shall not exceed 1.53 million cubic feet per day.

***Monitoring and Recordkeeping Requirements***

**3.6 Throughput Monitoring**

The permittee shall monitor and record the amount of natural gas combusted in Boiler No. 1 and Boiler No. 2 as specified in 40 CFR 60.48.c(g) or an approved alternative method to demonstrate compliance with Permit Condition 3.5. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.



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**4. GRAIN ROLLING MILL**

**4.1 Process Description**

The grain rolling mill portion of the facility stores grain temporarily in two 18,000-bushel staging bins. The grain is conveyed to a grain cleaner. The grain is conveyed to soaking bins, then to the steam flaking process where the grain is rolled into flakes. The flaked product is then cooled and conveyed to load-out bins. Two boilers provide the steam and heat for the grain flaking process. Five cyclones are used for conveying process material. The two cyclones on the cooling process control particulate emissions.

**4.2 Emissions Control Description**

Particulate matter emissions from the cooling process are controlled by two cooling tower cyclones.

**Table 4.1 COOLING PROCESS CYCLONES DESCRIPTION**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>
Cooling process	Two cyclones

***Emissions Limits***

**4.3 Opacity Limit**

Emissions from either of the two 18,000-bushel staging bins or from any of the seven cyclones referenced in the process description above, or any other stack, vent, or functionally equivalent opening associated with the bins or cyclones, 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.

***Operating Requirements***

**4.4 Throughput Limits**

- The combined maximum daily throughput of the 18,000-bushel staging bins shall not exceed 28,800 tons/day.
- The combined maximum annual throughput of the 18,000-bushel staging bins shall not exceed 2,080,000 tons per any consecutive 12-month period.

**4.5 Cooling Process Cyclone**

The cooling process cyclones shall be used to control PM<sub>10</sub> emissions from the cooling process and shall be operated in accordance with General Provision 2.

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***Monitoring and Recordkeeping Requirements***

**4.6 Staging Bin Throughput**

The permittee shall monitor and record the throughput to each of the 18,000 bushel staging bins daily and annually to demonstrate compliance with Permit Condition 4.4. Annual throughput shall be determined by summing daily throughput monthly, and then summing monthly throughput over the previous consecutive 12-month period. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

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**5. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

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 and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq., and the permittee is subject to penalties for each day of noncompliance.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
  - Initiation of Construction - Date
  - Completion/Cessation of Construction - Date
  - Actual Production Startup - Date
  - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If compliance testing is specified, the permittee must schedule and perform such testing within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup. This requirement shall be construed as an ongoing requirement. The permittee shall not operate the source without testing within 180 days. If testing is not conducted within 180 days after initial startup, then each day of operation thereafter without the required compliance test constitutes a violation. Such testing must strictly adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from DEQ. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to DEQ upon request.

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7. 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.
  
8. In accordance with IDAPA 58.01.01.123, 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.