Air Quality

PERMIT TO CONSTRUCT

Permittee
The Andersons, Inc

Permit Number
P-2021.0057

Project ID
62766

Facility ID
047-00010

Facility Location
815 Highway 26
Bliss, ID 83314

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 17, 2021

Emily Johnson, Permit Writer

Mike Simon, Stationary Source Bureau Chief
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1 Permit Scope

Purpose

1.1 This permit to construct (PTC) is a revision to the facility’s existing permit. This permit revision is a facility name and ownership change.

1.2 This PTC replaces Permit to Construct No. P-050416, issued on January 12, 2006.

Regulated Sources

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

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<td>Baghouse</td>
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2 Grain Storage Elevator

2.1 Process Description

The facility is a country elevator that receives grain by truck from farms during the harvest season. The grain is stored and shipped by railcar or truck to various destinations. Particulate matter emissions are primarily generated from the unloading of the trucks, grain transfers at the elevator, and loading of trucks or railcars. The primary control device for emissions is a baghouse.

2.2 Control Device Descriptions

Table 2.1 Grain Storage Elevator Description

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<td>Baghouse</td>
<td>Stack EP-1</td>
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Emission Limits

2.3 Emission Limits

- PM$_{10}$ emissions from the baghouse stack EP-1 shall not exceed 1.6 pounds per hour.
- PM$_{10}$ emissions from the baghouse stack EP-1 shall not exceed 6.8 tons per any consecutive 12-month period.

2.4 Opacity Limit

Emissions from the baghouse stack EP-1, or any other stack, vent, or functionally equivalent opening associated with the grain storage 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 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.5 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 using EPA Reference Method 22, as described in 40 CFR 60, Appendix A, or a DEQ-approved alternative method.
Operating Requirements

2.6 Throughput Limits
The annual throughput to the grain storage elevator shall not exceed 15 million bushels per any consecutive 12-month period (15,000,000 bu/yr).

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

2.8 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.

2.9 Operations and Maintenance Manual Requirements
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 3.2 and the manufacturer’s air pollution control device specifications. This manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

2.10 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, 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, 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

2.11 Throughput Limits
The permittee shall monitor and record the throughput of grain to the grain elevator monthly and annually to demonstrate compliance with Permit Condition 2.6. Throughput shall be measured in units of bushels and recorded as bushels per month (bu/mo) and bushels per year (bu/yr). Annual throughput shall be determined by summing each monthly throughput over the previous
consecutive 12-month period. The throughput records shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

2.12 Monitoring Operating Parameters
The permittee shall monitor and record the pressure drop across the baghouse once per week while operating to demonstrate compliance with Permit Condition 2.7. 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.

2.13 Fugitive Dust Log
The permittee shall maintain a log of all fugitive dust complaints. The validity of the complaints shall be assessed, and this assessment and any corrective action shall be recorded in the log.
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, 5/1/1994]

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, 5/1/1994]

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]