



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, ID 83706 • (208) 373-0502
www.deq.idaho.gov

Brad Little, Governor
Jess Byrne, Director

September 25, 2020

Brad Colling, Owner and General Manager
SEBS Feed and Supply, Inc.
1555 N 1200 E
Terreton, ID 83450

RE: Facility ID No. 051-00016, SEBS Feed and Supply, Inc., Terreton
Final Permit Letter

Dear Mr. Colling:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2017.0056 Project 62464 to SEBS Feed and Supply, Inc. located at Terreton for a permit modification to install a higher heat input boiler, add a new baghouse, and increase the annual throughput. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received June 6, 2020.

This permit is effective immediately and replaces PTC No. P-2017.0056 issued on July 12, 2018. This permit does not release SEBS Feed and Supply, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Idaho Falls Regional Office, 900 N. Skyline Drive, Suite B, Idaho Falls, ID 83402, Fax (208) 528-2695.

In order to fully understand the compliance requirements of this permit, as requested, Rensay Owen, Regional Air Quality Manager, at (208) 528-2650, will schedule a permit handoff meeting to review and discuss the terms and conditions of this permit. Please note that this meeting should be scheduled once the permitted emissions units are operating and some representative records required by the permit have been generated by the facility. 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.

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 contact Christina Boulay at (208) 373-0502 or christina.boulay@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Simon".

for, Mike Simon
Stationary Source Bureau Chief
Air Quality Division

MS\cb
Permit No. P-2017.0056 PROJ 62464
Enclosure (2)

Air Quality

PERMIT TO CONSTRUCT

Permittee SEBS Feed and Supply, Inc.
Permit Number P-2017.0056
Project ID 62464
Facility ID 051-00016
Facility Location 1555 N 1200 E
Terreton, ID 83450

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 September 25, 2020

Christina Boulay

Christina Boulay, Permit Writer

Darin Pappas

for, Mike Simon, Stationary Source Bureau Chief

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1 Permit Scope

Purpose

- 1.1 This is a modified permit to construct (PTC) to install a higher heat input boiler, add a baghouse, and increase the pellet, cube, bentonite and grain throughput, at an existing alfalfa manufacturing plant.
- 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.
- 1.3 This PTC replaces Permit to Construct No. P-2017.0056 issued on July 12, 2018.

Regulated Sources

Table 1.1 Regulated Sources

lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
3	<u>Tub Grinder (PE01):</u> Manufacturer: W.H.O. MFG. Model: 1164 Electric Manufacture Date: 2003 Maximum Capacity: 40 Tons/hour, 260 Tons/day	<u>East Baghouse PE04:</u> Manufacturer: Donaldson Torit Model: HPW80 PM _{2.5/10} control efficiency: 99.9% <u>West Baghouse PE10:</u> Manufacturer: Donaldson Torit Model: HPW96 PM _{2.5/10} control efficiency: 99.9% <u>Baghouse PE19:</u> Manufacturer: Donaldson Torit Model: 108MBT10 Stack Height: 22.3 vertical feet PM _{2.5/10} control efficiency: 99.9%
	<u>West Hammer Mill (PE02):</u> Manufacturer: CPM-California Pellet Mill Model: 20x44 Champion Mill Manufacture Date: 1/1/2008	<u>West Baghouse PE04:</u> Manufacturer: Donaldson Torit Model: HPW80 PM _{2.5/10} control efficiency: 99.9%
	<u>West Surge Bin Cyclone (PE03):</u> Manufacturer: Unknown Model: Unknown Manufacture Date: Unknown	
	<u>West Pellet Mill (PE05):</u> Manufacturer: Sprout Waldron Model: 26-300 Manufacture Date: 1/1/2008	<u>West Cooler Cyclone (PE07):</u> Manufacturer: Law Marot PM _{2.5/10} control efficiency: 90.0%
	<u>West Pellet Cooler (PE06):</u> Manufacturer: Law Marot Model: VC 95 Manufacture Date: 1/1/2008 Maximum Capacity: 19.8 Tons/hour pellets; Air Flow 12,500 CFM	

	<u>East Hammer Mill (PE08):</u> Manufacturer: CPM-California Pellet Mill Model: 20x44 Champion Mill Manufacture Date: 1/1/2003 <u>East Surge Bin Cyclone (PE09):</u> Manufacturer: LMC Model: 20x44 Champion Mill Manufacture Date: 1/1/2003	<u>East Baghouse (PE10):</u> Manufacturer: Donaldson Torit Model: HPW96 PM _{2.5/10} control efficiency: 99.9%
3	<u>East Pellet Mill 1 (PE11):</u> Manufacturer: CPM-California Pellet Mill Model: Century 100 Manufacture Date: 1999 <u>East Pellet Mill 2 (PE12):</u> Manufacturer: CPM-California Pellet Mill Model: Century 100 Manufacture Date: 1999 <u>East Pellet Mill 3 (PE13):</u> Manufacturer: CPM California Pellet Mill Model: Century 100 Manufacture Date: 1999 <u>East Pellet Cooler (PE14):</u> Manufacturer: Law Marot Model: VC 95 Manufacture Date: 1/1/2003 Maximum Capacity: 19.8 Tons/hour pellets; Air Flow 12,500 CFM	<u>East Cooler Cyclone (PE15):</u> Manufacturer: Custom Build PM _{2.5/10} control efficiency: 90.00%
4	<u>Cuber and Cooler Unit (PE16):</u> Manufacturer: Cooper Cuber Model: Single Head Cuber 250 Manufacture Date: 10/1/2003 Maximum Capacity: 8.0 Tons/hour <u>Hay Shredder (PE16A):</u> Manufacturer: Cooper Equipment Inc. Model: SHR440 Manufacture Date: 10/1/2003	<u>Baghouse PE19:</u> Manufacturer: Donaldson Torit Model: 108MBT10 Stack Height: 22.3 vertical feet PM _{2.5/10} control efficiency: 99.9%
5	<u>Storage & Load Out (BP02):</u> Manufacturer: Cooper Equipment Inc. Model: SHR440 Manufacture Date: 10/1/2003 <u>Bentonite Receiving (BP06):</u> Manufacturer: Cooper Equipment Inc. Model: SHR440 Manufacture Date: 10/1/2003 <u>Grain Receiving (BP08):</u> Manufacturer: Cooper Equipment Inc. Model: SHR440 Manufacture Date: 10/1/2003	
6	<u>Boiler (PE18):</u> Manufacturer: Superior Boiler Works Model: Super Seminole X6-5-1000-S15 Manufacture Date: 1987 Heat input rating: 7.88 MMBtu/hr Fuel: Liquid Petroleum Gas	

[9/25/2020]

2 Facility-Wide Conditions

Fugitive Dust Control

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651. 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 PM. Some of the reasonable precautions include, but are not limited to, the following practices, where practical:
- 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; and
 - Paving of roadways and their maintenance in a clean condition, where practical.
- [7/12/2018]
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive emissions.
- [7/12/2018]
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee’s assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a monthly 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.
- [7/12/2018]

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- [7/12/2018]

- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[7/12/2018]

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[7/12/2018]

- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The 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:

- a) 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 emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

- b) 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 actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.

[7/12/2018]

- 2.9 The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test 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.

[7/12/2018]

Reports and Certifications

- 2.10** Any reporting required by this permit—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications—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. Any reporting required by this permit, with the exception of a Portable Equipment Registration and Relocation form, shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Idaho Falls Regional Office
900 N. Skyline Drive, Suite B
Idaho Falls, Idaho 83402
Phone: (208) 528-2650
Fax: (208)528-2695

Kisco Boiler Removal or Render Inoperable Requirement

2.11 Kisco Boiler Removal or Render Inoperable Requirement

Prior to implementation of this permit to construct the permittee shall physically remove or permanently render inoperable the Kisco boiler, such that this emission unit no longer has the potential to emit any regulated air pollutants.

[9/25/2020]

Notification Requirements

2.12 Kisco Boiler Removal or Render Inoperable Notification Requirement

The permittee shall notify the Idaho Falls Regional Office that the Kisco boiler has been removed or rendered inoperable, to demonstrate compliance with the Kisco Boiler Removal or Render Inoperable Requirement Permit Condition.

[9/25/2020]

Stack Orientation and Height Requirement

2.13 Stack Orientation and Height Requirement

The permittee shall physically modify stacks PE04, PE07, PE15, PE19, and BP05 with uninterrupted vertical releases. PE19 stack shall be an uninterrupted vertical stack 22.3 feet above ground level.

[9/25/2020]

3 West and East Alfalfa Pellet Process Lines

3.1 Process Description

Hay is pulled from stacks via a front end loader and is loaded into an open top stationary electric tub grinder (PE01). The unit is located under the main storage and process shed. The tub grinder is the first unit in the west and east process lines; it is used to reduce the baled feed to coarse ground hammer mill feed. The coarse ground feed is collected at the bottom of the tub grinder and separated into two enclosed chutes. The two enclosed chutes split the coarse ground alfalfa into two feed streams and convey it to, two separate process lines, west and east. Baghouse (PE19) was installed with this permitting action to help control emissions from the top of the tub grinder.

The west hammer mill (PE02) continues to grind the alfalfa, and uses a pneumatic elevator to feed coarse ground alfalfa into a cyclone surge bin (PE03) which serves as a holding tank. The coarse ground alfalfa held in the cyclone surge bin is gravity fed into the west pellet mill (PE05). A baghouse (PE04) is connected to the cyclone surge bin and the ground alfalfa collected in the baghouse is transferred to the west pellet mill for processing. The west pellet mill has an integral meal conditioning and mixing section where steam is generated from the Superior Boiler Works boiler (PE18) to aid in pellet formation. From the west pellet mill process unit, the pellets are fed to the west pellet cooler (PE06), where the pellets are dried and cooled by the west cooler cyclone (PE07).

The east hammer mill (PE08) continues to grind the alfalfa, and uses a pneumatic elevator to feed into a cyclone surge bin (PE09) which serves as a holding tank. The coarse ground alfalfa held in the cyclone surge bin is gravity fed into the east pellet mills (PE11, PE12, PE13). A baghouse (PE10) is connected to the cyclone surge bin and the ground alfalfa collected in the baghouse is transferred to the east pellet mills for processing. Each east pellet mill has an integral meal conditioning and mixing section where steam is generated from the Superior boiler (PE18) to aid in pellet formation. From the east pellet mill process units, the pellets are fed to the east pellet cooler (PE14), where the pellets are dried and cooled by the east cooler cyclone (PE15). The pellet process lines are the primary production lines for the facility.

Bentonite clay is used as a binder for alfalfa pellets, and stored in BP07. Grain is added occasionally per customer requirements to change nutrient ratios in the pellets (e.g. to add more protein or carbohydrate). There are two silos which may house grain, batch process 09 and 10, (BP09 and BP10). Due to the design of the unloading elevator system, only one silo can be loaded at a time. There is only one receiving pit for the elevator that feeds all three silo's, labeled batch process 06 (BP06) for grain receiving, and batch process 08 (BP08) for bentonite receiving. Baghouse (PE19) was installed with this permitting action to help control emissions from this source.

The west baghouse is an emission point for the emissions that exit the lower end of the tub grinder, west hammer mill, and west surge bin cyclone. The west baghouse is also considered a process unit due to its efficiency of capturing product and recycling it within the production line.

The west cooler cyclone is an emission point for the west pellet mill, and west pellet cooler. The west cooler cyclone is also considered a process unit due to its efficiency of capturing product and recycling it within the production line.

The east baghouse is an emission point for the emissions that exit the lower end of the tub grinder, east hammer mill, and east surge bin cyclone. The east baghouse is also considered a process unit due to its efficiency of capturing product and recycling it within the production line.

The east cooler cyclone is an emission point for the east pellet mills, and east pellet cooler. The east cooler cyclone is also considered a process unit due to its efficiency of capturing product and recycling it within the production line.

[9/25/2020]

3.2 Control Device Descriptions

Table 3.1 Emission Units and Control Device Description

Emissions Units / Processes	Control Devices
<u>Tub Grinder (PE01):</u> Manufacturer: W.H.O. MFG. Model: 1164 Electric Manufacture Date: 2003 Maximum Capacity: 40 Tons/hour	<u>West Baghouse PE04:</u> Manufacturer: Donaldson Torit Model: HPW80 PM _{2.5/10} control efficiency: 99.9% <u>East Baghouse PE10:</u> Manufacturer: Donaldson Torit Model: HPW96 PM _{2.5/10} control efficiency: 99.9% <u>Baghouse PE19:</u> Manufacturer: Donaldson Torit Model: 108MBT10 Stack Height: 22.3 vertical feet PM _{2.5/10} control efficiency: 99.9%
<u>West Hammer Mill (PE02):</u> Manufacturer: CPM-California Pellet Mill Model: 20x44 Champion Mill Manufacture Date: 1/01/2008	<u>West Baghouse PE04:</u> Manufacturer: Donaldson Torit Model: HPW80 PM _{2.5/10} control efficiency: 99.9%
<u>West Surge Bin Cyclone (PE03):</u> Manufacturer: Unknown Model: Unknown Manufacture Date: Unknown	
<u>West Pellet Mill (PE05):</u> Manufacturer: Sprout Waldron Model: 26-300 Manufacture Date: 1/01/2008	<u>West Cooler Cyclone (PE07):</u> Manufacturer: Law Marot PM _{2.5/10} control efficiency: 90.00%
<u>West Pellet Cooler (PE06):</u> Manufacturer: Law Marot Model: VC 95 Maximum Capacity: 19.8 Tons/hour, Air Flow 12,500 CFM Manufacture Date: 1/01/2008	
<u>East Hammer Mill (PE08):</u> Manufacturer: CPM-California Pellet Mill Model: 20x44 Champion Mill Manufacture Date: 1/1/2003	<u>East Baghouse (PE10):</u> Manufacturer: Donaldson Torit Model: HPW96 PM _{2.5/10} control efficiency: 99.99%
<u>East Surge Bin Cyclone (PE09):</u> Manufacturer: LMC Model: L24FT Manufacture Date: 1/01/2003	

<u>East Pellet Mills (PE11, PE12, PE13):</u> Manufacturer: CPM-California Pellet Mill Model: Century 100 Manufacture Date: 1999	<u>East Cooler Cyclone (PE15):</u> Manufacturer: Unknown PM _{2.5/10} control efficiency: 90.00%
<u>East Pellet Cooler (PE14):</u> Manufacturer: Law Marot Model: VC 95 Maximum Capacity: 19.8 Tons/hour, Air Flow 12,500 CFM Manufacture Date: 1/01/2003	

[9/25/2020]

Emission Limits

3.3 Emission Limits

The emissions from the equipment listed in Table 3.1 shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Tub Grinder, West and East Hammer Mills, Surge Bin Cyclones, Pellet Mills, Pellet Cooler's, Bentonite and Grain receiving, and Bentonite and Grain Silo Emission Limits ^(a)

	PM _{2.5} ^(b)		PM ₁₀ ^(c)	
	lb/hr ^(d)	T/yr ^(e)	lb/hr ^(d)	T/yr ^(e)
Tub Grinder (PE01)	0.02	0.10	0.13	0.57
Baghouse (PE04) ^(f)	0.01	0.05	0.07	0.28
Cyclone (PE07) ^(g)	0.07	0.30	0.41	1.78
Baghouse (PE10) ^(h)	0.01	0.05	0.07	0.28
Cyclone (PE15) ⁽ⁱ⁾	0.07	0.30	0.41	1.78
Bentonite and Grain Combined (BP08 and BP06)	0.00	0.00	0.00	3.00E-03
Bentonite Silo (BP07)	5.00E-04	2.00E-03	4.10E-03	0.02
Grain Silo (BP09)	4.00E-03	0.02	0.02	0.10

- In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal two point five (2.5) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- Tons per any consecutive 12-calendar month period.
- The west hammer mill (PE02) and the west cyclone surge bin (PE03) are a closed system in succession and vent through the same baghouse (PE04). Emissions are calculated at (PE04) for both of these units.
- The west pellet mill (PE05) and the west pellet cooler (PE06) are a closed system in succession and vent through the same cyclone (PE07). Emissions are calculated at (PE07) for both of these units.
- The east hammer mill (PE08) and the east cyclone surge bin (PE09) are a closed system in succession and vent through the same baghouse (PE10). Emissions are calculated at (PE10) for both of these units.
- The east pellet mills (PE11, PE12, PE13) and the east pellet cooler (PE14) are a closed system in succession and vent through the same cyclone (PE15). Emissions are calculated at (PE15) for both of these units.

[9/25/2020]

Operating Requirements

3.4 Tub Grinder Throughput Limit

The daily throughput of the Tub Grinder (PE01) shall not exceed 260 tons per day of baled hay.

[9/25/2020]

3.5 Bentonite Receiving Throughput Limits

The maximum amount of bentonite received shall not exceed 90 tons per day.

[9/25/2020]

3.6 Grain Receiving Throughput Limits

The maximum amount of grain received shall not exceed 90 tons per day.

[9/25/2020]

3.7 Choke Feeding

The permittee shall minimize fugitive emissions from the bentonite and grain receiving pit through the use of “choke-feeding.” Choke-feeding is defined as maintaining an almost completely-filled receiving pit, with a sufficient head of material above the receiving opening to keep the pit full continuously during unloading activities. Therefore, operation of conveyors associated with the receiving shall not commence until the bentonite and grain receiving pit (BP08/BP06) is almost completely-filled.

[9/25/2020]

3.8 Control Equipment

The alfalfa pellet process equipment shall not be operated without being vented to a properly functioning baghouse and cyclone. The process units shall be operated according to Permit Conditions.

[7/12/2018]

3.9 Baghouse Process Equipment Efficiency (PE04), (PE10), and (PE19)

The permittee shall install and operate three baghouse control units to control PM_{2.5} and PM₁₀ emissions from the tub grinder (PE01), west and east hammer mill (PE02) and (PE08), west and east cyclone surge bin (PE03) and (PE09), to maintain a control efficiency of 99.9% or greater within both baghouses.

[9/25/2020]

3.10 Cyclone Process Equipment Efficiency (PE07) and (PE15)

The permittee shall install and operate a cyclone to control PM_{2.5} and PM₁₀ emissions from the west and east pellet mills (PE05, PE11, PE12, and PE13) and the west and east pellet coolers (PE06) and (PE14) to maintain a control efficiency of 90.0% or greater within both cyclones.

[7/12/2018]

3.11 Cyclone Process Equipment Pressure Drop Range (PE07) and (PE15)

The pressure drop across cyclone (PE07) shall be maintained between 8 and 11 inches of water, and the pressure drop across cyclone (PE15) shall be maintained between 6 and 8.7 inches of water.

As an alternative to the operating parameters specified in this permit for the cyclones, the permittee may establish a new operating parameter by conducting a performance test that demonstrates compliance with the applicable emission standards listed in Table 3.2, while operating at the alternative operating parameters. The performance test shall be conducted in accordance with the Test Methods and Procedures specified in the Rules (IDAPA 58.01.01.157) and in accordance with a DEQ approved source test protocol. All operating parameters specified in this permit condition shall be continuously monitored and recorded during each test run. The permittee may request to operate outside of the operating range specified by this permit during the performance test by submitting a written source protocol to DEQ for approval and requesting

to operate under alternative operating parameters during the duration of the test. Once the source test is completed, the permittee may request in writing to operate in accordance with alternative operating parameters. The request shall include a source test report and justification for the alternative operating parameter. Upon receiving DEQ written approval of the source test and the requested alternative operating parameter, the permittee shall operate in accordance with those DEQ approved alternative operating parameter. A copy of DEQ's approval shall be maintained on-site with a copy of this permit.

[7/12/2018]

3.12 Cyclone Process Equipment Pressure Drop Monitoring (PE07) and (PE15)

The permittee shall operate a device for the continuous measurement of the pressure drop across both cyclones in inches of water.

[7/12/2018]

Monitoring and Recordkeeping Requirements

3.13 Baghouse Process Equipment (PE04, PE10, and PE19) Visible Emissions Operation

Within 60 days of the issuance of this Permit to Construct (PTC), the permittee shall have developed a Baghouse Procedures document for the inspection and operation of baghouses (PE19) which controls emissions from the top of the tub grinder, and (PE04 and PE10) which control emissions from process lines which include the bottom of the tub grinder, west and east hammer mill (PE02 and PE08), and west and east cyclone surge bin (PE03 and PE09). The Baghouse Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse Procedures document shall describe the procedures that will be followed to comply with the General Provisions and shall contain requirements for daily see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at any time. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of each baghouse systems inspection in accordance with the General Provisions of this permit. The records shall include, but not be limited to, the following;

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse Procedures document shall be submitted to DEQ within 60 days of permit issuance for review and comment and shall contain a certification by a responsible official. Any changes to the Baghouse and Cyclone Procedures document shall be submitted within 15 days of the change.

The Baghouse and Cyclone Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring and recordkeeping requirements specified in the Baghouse Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[9/25/2020]

3.14 Cyclone Process Equipment (PE10 and PE15) Pressure Drop

The permittee shall monitor and record the pressure drop of the gas stream through both cyclones in inches of water once each week.

[7/12/2018]

3.15 Cyclone Process Equipment (PE10 and PE15) Inspections

The permittee shall inspect the cyclones each month. The inspection shall be to assure that both cyclones are not plugged, eroded or otherwise not functioning as designed. The permittee shall maintain a record of the inspections and any maintenance conducted.

The permittee shall maintain records of the results of all monitoring in accordance with the General Provisions of this permit.

[7/12/2018]

3.16 Baghouse and Cyclone Process Equipment PE04, PE10, PE07, PE15, and PE19 Manufacturer's Specifications

Documentation on the manufacturer's specifications shall remain on-site at all times and shall be made available to DEQ representatives upon request.

[9/25/2020]

3.17 Alfalfa Pellet Production Monitoring

The permittee shall monitor and record the number of hay bales used per day based on a 20 bale average bale weight to calculate the weight of alfalfa pellets manufactured on a daily basis in tons of product per day. All data shall be kept on-site, in a log, for a period of five (5) years and made available to DEQ representatives upon request.

[9/25/2020]

3.18 Bentonite and Grain Receiving Throughput Monitoring

The permittee shall monitor and record the throughput of grain and bentonite received per day, through receiving records, in a ton of product per day. All data shall be kept on-site, in a log, for a period of five (5) years and made available to DEQ representatives upon request.

[9/25/2020]

4 Alfalfa Cube Process Line

4.1 Process Description

Hay is pulled from stacks via a front end loader and is loaded into a horizontal side-fed stationary electric hay shredder (PE16A). The unit is located under the main storage and process shed, adjacent to the tub grinder. The hay shredder is the first unit in this process line; it is used to reduce the baled feed to coarse grind feed. The coarse grind feed is collected in enclosed chutes from the bottom of the hay shredder, and conveyed to the coarse ground meal condition process, cube press, and the cube cooler (PE16), where it is then transferred to the storage and bagging building (BP05).

[7/12/2018]

4.2 Control Device Descriptions

Table 4.1 Emission Units and Control Device Description

Emissions Units / Processes	Control Devices
<u>Cuber and Cooler Unit (PE16):</u> Manufacturer: Cooper Cuber Model: Single Head Cuber 250 Manufacture Date: 10/1/2003 Maximum Capacity: 8.0 Tons/hour Hay Shredder (PE16A)	<u>Baghouse PE19:</u> Manufacturer: Donaldson Torit Model: 108MBT10 Stack Height: 22.3 vertical feet PM _{2.5/10} control efficiency: 99.9%

[9/25/2020]

Emission Limits

4.3 Emission Limits

The emissions from the hay shredder and the cube cooler shall not exceed any corresponding emissions rate limits listed in Table 4.2.

Table 4.2 Cube Cooler and Hay Shredder Emission Limits ^(a)

	PM _{2.5} ^(b)		PM ₁₀ ^(c)	
	lb/hr ^(d)	T/yr ^(e)	lb/hr ^(d)	T/yr ^(e)
Cube Cooler (PE16) ^(f)	0.04	0.19	0.25	1.09
Hay Shredder (PE16A)	7.0E-03	0.03	0.04	0.18

- In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal two point five (2.5) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- Tons per any consecutive 12-calendar month period.
- The meal conditioning and cube press unit are part of the cube cooler unit (PE16).

[9/25/2020]

Operating Requirements

4.4 Throughput Limits

The daily throughput of the hay shredder (PE16A) shall not exceed 80 tons of baled hay per day.

[9/25/2020]

Monitoring and Recordkeeping Requirements

4.5 Alfalfa Cube Throughput Monitoring

The permittee shall monitor and record the number of hay bales used per day based on a 20 bale average bale weight to calculate the weight of alfalfa cubes manufactured on a daily basis in tons of product per day. All data shall be kept on-site, in a log, for a period of five (5) years and made available to DEQ representatives upon request.

[9/25/2020]

5 Superior Boiler Works

5.1 Process Description

The Superior Boiler Works (PE18) provides steam to the West Pellet Mill (PE05) and East Pellet Mills (PE11, PE12, PE13), for the production of alfalfa pellets, and the Cube (PE16 and PE16A), for the production of alfalfa cubes. The boiler uses liquid petroleum gas (LPG) only and operates at a maximum of 7.88 MMBtu/hr. The Superior Boiler Works boiler is rain capped, and the flue gas exhausts out of building 1 (BLD01).

[9/25/2020]

5.2 Control Device Descriptions

Table 5.1 Superior Boiler Works Description

Emissions Units / Processes	Control Devices
<u>Boiler (PE18):</u> Manufacturer: Superior Boiler Works Model: Super Seminole X6-5-1000-S15 Manufacture Date: 1987 Heat input rating: 7.88 MMBtu/hr Fuel: Liquid Petroleum Gas	None

[9/25/2020]

Emission Limits

5.3 Emission Limits

The emissions from the Superior Boiler Works boiler (PE18) stack shall not exceed any corresponding emission rate limits listed in Table 5.2.

Table 5.2 Superior Boiler Works Emission Limits ^(a)

Source Description	PM ₁₀ ^(b)		SO ₂		NO _x		CO		VOC	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Superior Boiler Works (PE18)	0.05	0.22	7.20E-03	0.03	0.93	4.09	0.54	2.36	0.05	0.25

- In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- Tons per any consecutive 12-calendar month period.

[9/25/2020]

5.4 Fuel-Burning Equipment

The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grain per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for liquid, in accordance with IDAPA 58.01.01.676.

[7/12/2018]

Operating Requirements

5.5 Allowable Fuels

The Superior Boiler Works boiler shall burn liquid petroleum gas (LPG) exclusively.

[9/25/2020]

5.6 Fuel Usage Limits

The maximum quantity of LPG, combusted in the Superior Boiler Works boiler shall not exceed 628,530 gallons per any consecutive 12-calendar month period.

[9/25/2020]

5.7 Monitoring Equipment

The Permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the amount of fuel burned in the boiler.

[7/12/2018]

Monitoring and Recordkeeping Requirements

5.8 Fuel Usage Monitoring

The permittee shall monitor and record the gallons of liquid petroleum gas combusted in the Superior Boiler Works boiler each calendar month and consecutive 12-calendar month period.

[9/25/2020]

5.9 Fuel Usage Recordkeeping

All data shall be kept on-site, in a log, for a period of five (5) years and made available to DEQ representatives upon request.

6 General Provisions

General Compliance

6.1 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.]

6.2 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]

6.3 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

6.4 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

6.5 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]

6.6 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

6.7 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.

6.8 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.

6.9 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

6.10 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

- 6.11** 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

- 6.12** 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

- 6.13** 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

- 6.14** 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

- 6.15** 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

- 6.16** 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]