



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

February 10, 2012

Ron Parks, Environmental Manager
Western Stockmen's
223 Rodeo Avenue
Caldwell, ID 83605

RE: Facility ID No. 027-00008, Western Stockmen's, Caldwell
Final Permit Letter

Dear Mr. Parks:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2011.0143 Project 60973 to Western Stockmen's located at Caldwell for the PTC modification to reflect the current process. 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 December 9, 2011.

This permit is effective immediately and replaces PTC No. 0400-0008, issued on May 1, 1990. This permit does not release Western Stockmen's 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 Tom Krinke, Air Quality Compliance Officer, at (208) 373-0419 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.

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 Kelli Wetzel at (208) 373-0502 or kelli.wetzel@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon". The signature is written in a cursive style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\KW

Permit No. P-2011.0143 PROJ 60973

Enclosures

Air Quality
PERMIT TO CONSTRUCT

Permittee WSI Caldwell Facility

Permit Number P-2011.0143

Project ID 60973

Facility ID 027-00008

Facility Location 223 Rodeo Avenue
Caldwell, Idaho, 83605

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 its 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; (g) 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. 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 May 1, 1990

Date Revised February 10, 2012


Kelli Wetzel, Permit Writer


Mike Simon, Stationary Source Manager

PERMIT SCOPE 3
ANIMAL FEED PROCESSING OPERATIONS 4
SEED PROCESSING OPERATIONS 10
BOILERS..... 14
GENERAL PROVISIONS 15

PERMIT SCOPE

Purpose

1. This is a modified permit to construct for J.R. Simplot Company Western Stockmen's (WSI) located in Caldwell.
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.
3. This PTC replaces Permit to Construct No. 0400-0008, issued on May 1, 1990.
4. The emission sources regulated by this permit are listed in the following table.

Table 1 REGULATED SOURCES

Sources	Control Equipment
<u>Animal Feed Processing Operations</u> <ol style="list-style-type: none"> 1. Receiving and Grinding 2. Non-Medicated Mill Line 3. Rolled and Texturized Lines 4. Mixing Process/Blocking Process/Middle Bagger 5. Pellet Mills 1, 2, 3, and 4 6. Feed Mill Storage and Product Loadout 	Baghouse No. 1 or Baghouse No. 12 for Mixing Process/Blocking Process/Middle Bagger (Mixer Paddle) Baghouse No. 2 for Mixing Process/Blocking Process/Middle Bagger (Mixer Elevator) Baghouse No. 3 for Pellet Mills 1 and 2 (Internal Dust Control System) Baghouse No. 4 for Pellet Mills 3 and 4 Baghouse No. 5 for Grinder Baghouse No. 6 for Rolled and Texturized Lines (Air System Baghouse) Baghouse No. 7 for Rolled and Texturized Lines (Roll Screen Baghouse) Baghouse No. 8 for Middle Bagger Baghouse No. 9 for New Side Receiving and Grinding Baghouse No. 10 for Old Side Receiving and Grinding Baghouse No. 11 for Non-Medicated Mill Line Baghouse No. 12 for Rollo Mixer Baghouse No. 13 for Feed Mill Storage and Receiving Baghouse No. 14 for Product Loadout
<u>Seed Processing Operations</u> <ol style="list-style-type: none"> 1. Truck Unloading 2. Seed Conveying 3. Screen Line 1 4. Screen Line 2 5. Screen Line 3 6. Secondary Bagger 7. Truck Loading 	Cyclone No. 1 for Screen Line 1 Cyclone No. 2 for Screen Line 1 Cyclone No. 3 for Screen Line 2 Baghouse No. 15 for Screen Line 3
Boiler Nos. 1 through 3	None

[February 10, 2012]

ANIMAL FEED PROCESSING OPERATIONS

Process Description

5. The WSI facility in Caldwell, ID manufactures animal feed. The facility receives grain, corn, trace minerals and seed either through truck or rail car. The commodities are augured and elevator transferred into storage bins. Ingredients from the storage bins are weighted and mixed with additional additives. The finished ingredient mix is then either directly bagged, pressed into feed blocks, rolled and texturized, or pelletized. The final product is either bagged or transferred for bulk sales. This process is completed for both the main product line and the non-medicated product line.

6. Control Descriptions

Table 2 ANIMAL FEED PROCESSING OPERATION DESCRIPTION

Emissions Units / Processes	Control Devices
<u>Animal Feed Processing Operations</u> 1. Receiving and Grinding 2. Non-Medicated Mill Line (Including Non-Med Pellet Mill) 3. Rolled and Texturized Lines 4. Mixing Process/Blocking Process/Middle Bagger 5. Pellet Mills 1, 2, 3, and 4 6. Feed Mill Storage and Product Loadout	Baghouse Nos. 1 through 14

[February 10, 2012]

Emission Limits

7. Emission Limits

The emissions from the animal feed processing operations shall not exceed any emissions rate limit in the following table.

Table 3 ANIMAL FEED PROCESSING OPERATIONS EMISSION LIMITS ^(a)

Sources	PM ₁₀ ^(b)	
	lb/hr ^(c)	T/yr ^(d)
Animal Feed Processing Operation	0.23	1.02

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.
- b) 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.
- c) 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.
- d) Tons per any consecutive 12 calendar month period.

[February 10, 2012]

8. Opacity Limit

Emissions from the animal feed processing baghouses stack, or any other stack, vent, or functionally equivalent opening associated with the animal feed processing baghouses, 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.

[February 10, 2012]

Operating Requirements

9. **Animal Feed Throughput Limit**

Pellet Mills 1, 2, 3, and 4 and the Non-Medicated Feed Line shall not process more than 62,000 tons each of produced animal feed per any consecutive 12-month period.

[February 10, 2012]

10. **Raw Commodity Receiving Throughput Limit**

The total amount of raw commodities received at the facility by either truck or rail car shall not exceed 310,000 tons per any consecutive 12-month period.

[February 10, 2012]

11. **Reasonable Control of Fugitive Emissions**

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, considerations 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:

- 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. Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

[February 10, 2012]

12. **Baghouses Procedures Document**

Within 60 days of permit issuance, the permittee shall have developed a Baghouse Procedures document for the inspection and operation of the baghouses which control emissions from the animal feed processing operations (Baghouse Nos. 1 through 14). 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 Compliance General Provision and shall contain requirements for monthly 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 Baghouse Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

[February 10, 2012]

13. **Maintenance and Operation of the Baghouses**

The permittee shall maintain and operate the animal feed processing baghouses (Baghouse Nos. 1 through 14) according to manufacturer's specifications and recommendations and the Baghouse Procedures document.

[February 10, 2012]

14. **Baghouse Operations**

The animal feed processing baghouses (Baghouse Nos. 1 through 14) shall be operated whenever the respective animal feed processing lines are in operation. The filters associated with the baghouses shall have a minimum PM₁₀ control efficiency of 99.0%.

[February 10, 2012]

Monitoring and Recordkeeping Requirements

15. **Animal Feed Throughput Monitoring**

The permittee shall monitor and record the monthly and annual animal feed throughput in tons through each Pellet Mill (Pellet Mills 1, 2, 3, and 4) and the Non-Medicated Feed Line in order to demonstrate compliance with the Animal Feed Throughput Limit Permit Condition. Annual animal feed throughput shall be determined by summing total monthly animal feed throughput over each previous consecutive 12-month period.

[February 10, 2012]

16. **Raw Commodity Receiving Throughput Monitoring**

The permittee shall monitor and record on a monthly basis the amount of bulk commodities received at the facility by either truck or rail car in order to demonstrate compliance with the Raw Commodity Receiving Throughput Limit Permit Condition. Annual raw commodity receiving throughput shall be determined by summing total monthly bulk commodity receiving throughput over each previous consecutive 12-month period.

[February 10, 2012]

17. **Raw Commodity Delivery Records/Receipts**

The permittee shall maintain delivery records/receipts of raw commodities received at this facility in order to demonstrate compliance with the Raw Commodity Receiving Throughput Limit Permit Condition.

[February 10, 2012]

18. **Responsible Control Measures**

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. A compilation of the most recent five years of records shall be kept onsite and made available to DEQ representatives upon request.

[February 10, 2012]

19. **Visible Emissions Monitoring**

The permittee shall conduct a monthly inspection of visible emissions from the animal feed processing baghouse stacks during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation of visible emissions. If any visible emissions are present from the baghouse stacks, the permittee shall either take appropriate corrective action as expeditiously as practicable, or 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% 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 exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions 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.

[February 10, 2012]

Federal Requirements

40 CFR 63 Subpart DDDDDDD Requirements

"National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing"

20. In accordance with 40 CFR 63.11620, the permittee must comply with the applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD by January 5, 2012.

[February 10, 2012]

21. In accordance with 40 CFR 63.11621(a), the permittee shall comply with the following management practices and standards at all times:

- In all areas where materials containing chromium or manganese are stored, used, or handled, an industrial vacuum system or manual sweeping shall be used to reduce the amount of dust.
- At least once per month the permittee shall remove dust from walls, ledges, and equipment using low pressure air and then sweep or vacuum the area.

- The exterior doors in the immediate affected areas shall remain shut except during normal ingress and egress, as practicable. This does not apply to areas where finished product is stored in closed containers, and no other materials containing chromium or manganese are present.
- All process equipment must be maintained and operated in accordance with manufacturer's specifications and in a manner to minimize dust creation.

[February 10, 2012]

22. In accordance with 40 CFR 63.11621(b), the permittee shall store any raw material containing chromium or manganese in closed containers.

[February 10, 2012]

23. In accordance with 40 CFR 63.11621(c), the permittee shall cover the mixer where materials containing chromium or manganese are added when mixing is occurring at all times. Materials containing chromium or manganese must be added to the mixer in a manner that minimizes emissions.

[February 10, 2012]

24. In accordance with 40 CFR 63.11621(d), the permittee shall lessen fugitive emissions from the bulk loading process where materials containing chromium or manganese are loaded into truck or railcars. The distance between the loadout spout and the vehicle being loaded can be reduced by using a device of any kind at the bulk loadout spout that minimizes the distance to the vehicle being loaded or any other means to minimize the distance.

[February 10, 2012]

25. In accordance with 40 CFR 63.11622, the permittee shall perform monthly inspections of each device at the loadout end of a bulk loader that reduces fugitive emissions from a bulk loading process. The permittee shall record the results of these inspections in accordance with 40 CFR 63.11624(c)(4) of this Subpart.

[February 10, 2012]

26. In accordance with 40 CFR 63.11624(a)(1), the permittee shall submit an Initial Notification no later than May 5, 2010 or 120 days after becoming subject to 40 CFR 63 Subpart DDDDDDD. The Initial Notification must include:

- The name, address, phone number, and e-mail address of the owner and operator
- The address (physical location) of the affected source
- An identification of the relevant standard
- A brief description of the operation.

[February 10, 2012]

27. In accordance with 40 CFR 63.11624(a)(2), the permittee shall submit a Notification of Compliance Status on or before May 4, 2012. The Notification of Compliance Status must include:

- The company's name and address
- A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of the subpart

- If the facility is not subject to a requirement in §63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations because the initial average daily feed production level was 50 tons per day or less, documentation of the initial daily pelleting production level determination.

[February 10, 2012]

28. In accordance with 40 CFR 63.11624(b), the permittee shall submit an Annual Compliance Certification report by March 1 of each year containing the following information:

- The company's name and address
- A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of the subpart
- If the facility is not in compliance, include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken.

[February 10, 2012]

29. In accordance with 40 CFR 63.11624(c), the permittee shall maintain the following records:

- Keep a copy of each notification submitted to comply with this subpart in accordance with 40 CFR 63.11624(a), and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted
- Keep a copy of each Annual Compliance Certification prepared
- For each device used to comply with the requirements in §63.11621(d), keep the records of all inspections including the date, place and time of each inspection, the person performing the inspection, and the results of the inspection, including the date, time, and duration of the corrective action period from the time the inspection indicated a problem to the time of the indication that the device was replaced or restored to operation.
- The records must be in a form suitable and readily available for expeditious review
- Each record must be kept for 5 years following the date of each recorded action
- Each record must be kept onsite for at least 2 years after the date of each recorded action. The records may be kept offsite for the remaining 3 years.

[February 10, 2012]

30. Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60
- National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[February 10, 2012]

SEED PROCESSING OPERATIONS

Process Description

31. The facility receives raw seeds or grain by truck. The commodities are augured and elevator transferred into storage bins. The seeds are transferred to one of three seed cleaning towers. Once cleaned, the finished seeds are transferred to storage bins. The seeds are either bagged or transferred for bulk sales.

32. Control Descriptions

Table 4 SEED PROCESSING OPERATION DESCRIPTION

Emissions Units / Processes	Control Devices
<u>Seed Processing Operations</u> 1. Truck Unloading 2. Seed Conveying 3. Screen Line 1 4. Screen Line 2 5. Screen Line 3 6. Secondary Bagger 7. Truck Loading	Cyclone Nos. 1 through 3 Baghouse No. 15

[February 10, 2012]

Emission Limits

33. Emission Limits

The emissions from the seed processing operations shall not exceed any emissions rate limit in the following table.

Table 5 SEED PROCESSING OPERATIONS EMISSION LIMITS ^(a)

Sources	PM ₁₀ ^(b)	
	lb/hr ^(c)	T/yr ^(d)
Seed Processing Operation	0.02	0.09

- e) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.
- f) 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.
- g) 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.
- h) Tons per any consecutive 12 calendar month period.

[February 10, 2012]

34. Opacity Limit

Emissions from the seed processing baghouse and cyclones stack, or any other stack, vent, or functionally equivalent opening associated with the seed processing baghouse and 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.

[February 10, 2012]

Operating Requirements

35. **Raw Commodity Receiving Throughput Limit**

The total amount of raw commodities received at the facility by either truck or rail car shall not exceed 310,000 tons per any consecutive 12-month period.

[February 10, 2012]

36. **Reasonable Control of Fugitive Emissions**

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, considerations 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:

- 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. Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

[February 10, 2012]

37. **Baghouses Procedures Document**

Within 60 days of permit issuance, the permittee shall have developed a Baghouse Procedures document for the inspection and operation of the baghouse which control emissions from the seed processing operations (Baghouse No. 15). 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 Compliance General Provision and shall contain requirements for monthly 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 Baghouse Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

[February 10, 2012]

38. **Maintenance and Operation of the Baghouses**

The permittee shall maintain and operate the seed processing baghouse (Baghouse No. 15) according to manufacturer's specifications and recommendations and the Baghouse Procedures document.

[February 10, 2012]

39. **Baghouse Operations**

The seed processing baghouse (Baghouse No. 15) shall be operated whenever the respective seed processing lines are in operation. The filters associated with the baghouse shall have a minimum PM₁₀ control efficiency of 99.0%.

[February 10, 2012]

40. **Cyclone Requirements**

The seed processing cyclones (Cyclone Nos. 1 through 3) shall be operated whenever the respective seed processing lines are in operation.

[February 10, 2012]

41. **Maintenance and Operation of the Cyclones**

The permittee shall maintain and operate the seed processing cyclones (Cyclone Nos. 1 through 3) according to manufacturer's specifications and recommendations.

[February 10, 2012]

Monitoring and Recordkeeping Requirements

42. **Raw Commodity Receiving Throughput Monitoring**

The permittee shall monitor and record on a monthly basis the amount of bulk commodities received at the facility by either truck or rail car in order to demonstrate compliance with the Raw Commodity Receiving Throughput Limit Permit Condition. Annual raw commodity receiving throughput shall be determined by summing total monthly bulk commodity receiving throughput over each previous consecutive 12-month period.

[February 10, 2012]

43. **Raw Commodity Delivery Records/Receipts**

The permittee shall maintain delivery records/receipts of raw commodities received at this facility in order to demonstrate compliance with the Raw Commodity Receiving Throughput Limit Permit Condition.

[February 10, 2012]

44. **Inspection of the Cyclones**

The permittee shall inspect Cyclone Nos. 1 through 3 each month to assure that they are not plugged, eroded or otherwise not functioning as designed. The permittee shall maintain a record of the inspections and any maintenance conducted.

[February 10, 2012]

45. **Responsible Control Measures**

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. A compilation of the most recent five years of records shall be kept onsite and made available to DEQ representatives upon request.

[February 10, 2012]

46. **Visible Emissions Monitoring**

The permittee shall conduct a monthly inspection of visible emissions from the seed processing baghouse stacks during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation of visible emissions. If any visible emissions are present from the baghouse stacks, the permittee shall either take appropriate corrective action as expeditiously as practicable, or 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% 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 exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions 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.

[February 10, 2012]

BOILERS

Process Description

47. Three natural-gas fired boilers are used at WSI. Two boilers are located in the main feed processing area while the third boiler services the non-medicated line area. Of the two boilers located in the main feed area, the first has a maximum rated capacity of 8.4 MMBtu/hr while the second has a maximum rated capacity of 4.1 MMBtu/hr. The third boiler located at the non-medicated line area has a maximum rated capacity of 4.1 MMBtu/hr.

48. **Control Descriptions**

Table 6 BOILERS DESCRIPTION

Emissions Units / Processes	Control Devices
Boiler Nos. 1 through 3	None

[February 10, 2012]

Emission Limits

49. **Emission Limits**

The permittee shall not discharge to the atmosphere from any fuel burning equipment in operation on or after October 1, 1979, PM in excess of 0.015 gr/dscf corrected to 3% oxygen.

[February 10, 2012]

Operating Requirements

50. **Fuel Type Restriction**

Boiler Nos. 1 through 3 shall be fired on natural gas exclusively.

[February 10, 2012]

GENERAL PROVISIONS

General Compliance

51. 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.

[Idaho Code §39-101, et seq.]

52. 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, 5/1/94]

53. 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

54. 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 or 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

55. 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]

56. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:

- 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;

- 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, 5/1/94]

Performance Testing

57. 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, at its option, may 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.
58. 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.
59. Within 30 days, or up to 60 days when requested 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 written 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, 4/5/00]

Monitoring and Recordkeeping

60. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information 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 and 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, 5/1/94]

Excess Emissions

61. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

62. 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, 5/1/94]

False Statements

63. 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, 3/23/98]

Tampering

64. 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, 3/23/98]

Transferability

65. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

66. 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, 5/1/94]