



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor
Toni Hardesty, Director

December 14, 2005

Certified Mail No. 7005 1160 0000 1550 0252

Kirby J. Kraft
Busch Agricultural Resources, Inc.
3636 South Geyer Road
St. Louis, Missouri 63127-1218

RE: Facility ID No. 019-00028, Busch Agricultural Resources Grain Elevator, Idaho Falls
Final Permit Letter

Dear Mr. Kraft:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050504 for the Idaho Falls Grain Elevator, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on June 28, 2005. This permit is effective immediately and replaces PTC No. 019-00028, issued on June 18, 2002. This permit does not release Busch Agricultural Resources, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Idaho Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Dan Pitman at (208) 373-0500 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script that reads "Martin Bauer".

Martin Bauer, Administrator
Air Quality Division

MB/DP/sd

Permit No. P-050504

Enclosures



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT NO.: P-050504
FACILITY ID NO.: 019-00028
AQCR: 61 **CLASS:** SM
SIC: 5153 **ZONE:** 12
UTM COORDINATE (km): 413.0, 4830.0

1. PERMITTEE

Busch Agricultural Resources, Inc.

2. PROJECT

Idaho Falls Grain Elevator

3. MAILING ADDRESS

2121 W. 145 N.

CITY

Idaho Falls

STATE

ID

ZIP

83402

4. FACILITY CONTACT

Kirby J. Kraft

TITLE

Director, Malt Administration and
Environmental Engineering

TELEPHONE

(314) 909-3935

5. RESPONSIBLE OFFICIAL

Stephen D. Malin

TITLE

Vice President

TELEPHONE

(314) 909-3920

6. EXACT PLANT LOCATION

T3N, R37E, Section 2 (2121 W. 145 N., Idaho Falls, Idaho)

COUNTY

Bonneville

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Barley handling and storage facility

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed by this permit.

This permit (1) does not affect the title of the premises upon which the equipment is to be located; (2) 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; (3) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (4) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees, assumes any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

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


TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: December 14, 2005

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050504

Permittee:	Busch Agricultural Resources,	Facility ID No. 019-00028	Date Issued:	December 14, 2005
Location:	Idaho Falls, Idaho			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 The purpose of this permit revision is to address applicability of the Standards of Performance for Grain Elevators under 40 CFR 60 Subpart DD.
- 1.2 This PTC replaces PTC No. 019-00028 issued on June 18, 2002, the terms and conditions of which no longer apply.
- 1.3 The following is a chronological history of the permits issued at this facility which are no longer in effect.
 - PTC No. 0260-0028 issued on February 20, 1990
 - PTC No. 019-00028 issued on September 29, 1995
 - PTC No. 019-00028 issued on December 11, 2001
 - PTC No. 019-00028 issued on June 18, 2002

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Source Description	Emissions Control(s)
Receiving pit, rated at 10,000 b/hr	Baghouse, MAC 144 MCF 153, air-to-cloth ratio is 10:1, 153 filter bags, each one 144 inches long, PM control efficiency is 99.7%, stack height 160.0 ft, stack diameter 3.1 ft, exit flow rate of 22,000 acfm
Two truck-receiving conveyors, each rated at 10,000 b/hr	
Two receiving conveyors, 10,000 b/hr	
Clean grain leg, 7,500 b/hr	
Distributor, 10,000 b/hr	
Screenings leg, 1,500 b/hr	Baghouse, MAC 96 AVS 49, air-to-cloth ratio is 10:1, 49 filter bags, each one 96 inches long, assumed PM control efficiency is 99.7%, exit flow rate of 6,000 acfm
Screenerator, 5,000 b/hr	
Screening conveyor, 5,000 b/hr	
Trash discharge from screenerator	
Clean grain discharge from screenerator	
Four reclaim conveyors, each 1,000 b/hr	

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2. EMISSION LIMITS

2.1 Emissions Limits - NSPS

Particulate matter emissions from either baghouse stack shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf) in accordance with 40 CFR 60.302. If EPA determines that 40 CFR 60 Subpart DD does not apply to this facility, then a copy of the determination shall be maintained on-site, and the permittee is not required to comply with this permit condition.

2.2 Emissions Limits

Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) emissions from the baghouse stack shall not exceed any corresponding emission rate limits listed in the appendix.

2.3 Stack Opacity Limit - NSPS

Emissions from baghouse stacks, grain dryers, and grain handling operations, where grain handling operations include bucket elevators or legs, scale hoppers and surge bins (garners), turn heads, scalpers, cleaners, trippers, and the headhouse, and other such structures, shall not exceed 0% opacity, in accordance with 40 CFR 60.303. Opacity shall be determined by the methods in IDAPA 58.01.01.625 and EPA Method 9 in accordance with 40 CFR 60, Appendix A. If EPA determines that 40 CFR 60 Subpart DD does not apply to this facility, then a copy of the determination shall be maintained on-site, and the permittee is not required to comply with this permit condition.

2.4 Visible Fugitive Emissions - NSPS Sources

Visible fugitive emissions shall not exceed the following limits in accordance with 40 CFR 60.302(c). If EPA determines that 40 CFR 60 Subpart DD does not apply to this facility, then a copy of the determination shall be maintained on-site, and the permittee is not required to comply with this permit condition.

- 5% opacity for an individual truck and railcar-unloading station.
- 10% opacity from an individual truck-loading station.
- 0% opacity for the grain handling system, defined as any bucket elevators or legs, scale hoppers and surge bins (garners), turn heads, scalpers, cleaners, trippers, and the headhouse, and other such structures.

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3. OPERATING REQUIREMENTS

3.1 Production Limits

- 3.1.1 The grain throughput of the facility shall not exceed 240,000 bushels per day and 20 million bushels per consecutive 12-month period.
- 3.1.2 The facility shall not clean grains at a rate that exceeds 120,000 bushels per day.

3.2 Operations and Maintenance Manual Requirements

The permittee shall maintain an Operations and Maintenance (O&M) manual for the baghouses that describes the procedures that will be followed to comply with General Provision 2 and Permit Condition 3.3. The manual shall include, at a minimum, the methods of measuring pressure drop and other operating parameters, the manufacturer operating parameters, and a maintenance schedule for the baghouse(s). This manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

3.3 Baghouse Operation

Emissions of PM and PM₁₀ shall be controlled by one or more baghouse filters. The permittee shall operate and maintain the baghouse control system in accordance with an O&M manual for the barley grain elevator baghouse. The pressure drop across the baghouse shall be maintained within the manufacturer specifications stated in the O&M manual.

3.4 Reasonable Control of Fugitive Emissions - Fugitive Dust Control Plan

All reasonable precautions shall be taken to prevent PM 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 that might affect the movement of PM. To establish reasonable precautions, the Permittee shall develop, maintain and implement a Fugitive Dust Control Plan which identifies potential sources of fugitive dust and which establishes good operating practices for limiting the formation and dispersion of dust from those sources. The approved Fugitive Dust Control Plan is part of the terms and conditions of the permit.

The Fugitive Dust Control Plan (Plan) for the Idaho Falls Grain Elevator shall, at a minimum, include information and establish requirements as follows:

1. Include a general description of each potential source of fugitive dust from the facility.
2. Establish procedures for controlling dust from on-site vehicle operations such as by applying asphalt, water, or suitable chemicals to, or covering, dirt roads, material stockpiles, and other surfaces that can create dust.
3. Establish procedures for installing and using hoods, fans, fabric filters, or equivalent systems to enclose/capture and vent the handling of dusty materials.
4. Establish procedures for covering open-bodied trucks transporting materials likely to give rise to airborne dusts, paving roadways, and maintaining them in a clean condition.

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5. Establish procedures for promptly removing earth or other stored material from streets.
6. Establish procedures to minimize dust formation during truck and rail loading and unloading operations such as minimizing material drop heights.
7. Establish procedures for training/orientation of employees about the Fugitive Dust Control Plan procedures.

The initial Fugitive Dust Control Plan shall be submitted to DEQ for review and approval no later than 60 days after the issuance date of this permit. After approval of the initial plan, the permittee may update the plan at any time by submitting the proposed changes to DEQ for review and approval. The updated plan shall not become effective until approved by DEQ. If DEQ deems that the change in the plan qualifies as permit to construct modification as defined in IDAPA 58.01.01.006, the procedures specified in IDAPA 58.01.01.200-228 shall be followed to make the change.

When in operation, the permittee shall comply with the provisions in the approved Fugitive Dust Control Plan at all times. Whenever an operating parameter is outside the operating range specified by the plan, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range.

A copy of the Fugitive Dust Control Plan shall remain onsite at all times.

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4. MONITORING AND RECORDKEEPING REQUIREMENTS

4.1 Production Monitoring

4.1.1 The permittee shall monitor and record the grain throughput of the facility in bushels per day and bushels per consecutive 12-month period. These records shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

4.1.2 The permittee shall monitor and record the grain throughput from the grain cleaning operations in bushels per day. These records shall remain onsite for the most recent two-year period and shall be available to DEQ representatives upon request.

4.2 Monitor Operating Parameters

The permittee shall monitor and record the pressure drop across the baghouse(s) on a weekly basis. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

4.3 Fugitive Emissions

The permittee shall conduct a quarterly plant-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. There shall be a minimum of 60 days between each inspection.

The permittee shall maintain records of the results of each quarterly fugitive emissions inspection. The records shall, at a minimum, include 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.

The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date 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.

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

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5. REPORTING REQUIREMENTS

5.1 Excess Emission Report

Within 15 days of an excess emissions event, the permittee shall submit an excess emissions report to DEQ. The report shall contain the date, duration, emissions units involved, and description of the causes of the exceedance and the procedures taken to remedy the cause of the exceedance in accordance with IDAPA 58.01.01.130-136.

5.2 Certification of Documents

All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, 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 in accordance with IDAPA 58.01.01.123.

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6. PERFORMANCE TESTING

6.1 Performance Test Protocol

The permittee is encouraged to submit a test protocol for the performance tests required in Permit Condition 6.2 to DEQ for approval at least 30 days prior to the test days.

6.2 Performance Test

6.2.1 When required by the EPA Administrator under 40 CFR 60.8, the permittee shall conduct performance tests in accordance with 40 CFR 60.8 and 60.303 to measure PM and opacity from the baghouses in order to demonstrate compliance with Permit Conditions 2.1 and 2.2.

6.2.2 When required by the EPA Administrator to demonstrate compliance with Permit Condition 2.4, the permittee shall conduct performance tests to measure opacity of fugitive emissions from grain loading and unloading stations in accordance with 40 CFR 60.8.

6.3 Performance Test Report

6.3.1 The permittee shall submit a report of the results of the performance tests required in Permit Conditions 6.2.1 and 6.2.2, including all required process data, to DEQ within 30 days after the date on which the testing is concluded in accordance with IDAPA 58.01.014.157 and CFR 60.8.

6.3.2 The permittee shall submit a report of the results of the opacity tests required in Permit Conditions 6.2.1 and 6.2.2 to EPA Region 10 in accordance with IDAPA 58.01.01.157 and 40 CFR 60.8.

6.4 NSPS Applicability

If EPA determines that 40 CFR 60 Subpart DD does not apply to this facility, then a copy of the determination shall be maintained on-site, and the permittee is not required to comply with Permit Conditions 6.1 through 6.3.2 of this permit.

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7. NEW SOURCE PERFORMANCE STANDARDS NOTIFICATION

The permittee shall furnish to DEQ and EPA Region 10 office written notification for new or modified equipment subject to 40 CFR 60, Subpart DD, as required in 40 CFR 60.7. If EPA determines that 40 CFR 60 Subpart DD does not apply to this facility, then a copy of the determination shall be maintained on-site.

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8. APPENDIX

Busch Agricultural Resources, Inc.

**IDAHO FALLS GRAIN ELEVATOR AND CLEANING FACILITY
EMISSION LIMITS - HOURLY (LB/HR)^a AND ANNUAL (T/YR)^b**

Source Description	PM/PM ₁₀	
	lb/hr ^a	T/yr ^b
Baghouse - MAC 96 AVS 49	0.5	2.2
Baghouse - MAC 144 MCF153	1.9	8.3
Total	2.4 lb/hr	10.5 T/yr

^a average pounds per hour based on a 24-hr period.
^b tons per any consecutive 12-month period.

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9. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If 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.

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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.

Within 30 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 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.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.