



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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C.L. "Butch" Otter, Governor  
Curt Fransen, Director

August 23, 2013

Arvid Lyons, Facility Manager  
Lewis-Clark Terminal  
1534 3<sup>rd</sup> Avenue North  
Lewiston, ID 83501

RE: Facility ID No. 069-00010, Lewis-Clark Terminal, Lewiston  
Final Permit Letter

Dear Mr. Lyons:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2013.0039 Project 61222 to Lewis-Clark Terminal located at Lewiston for the grain elevator. 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 10, 2013.

This permit is effective immediately and replaces PTC No. P-2012.0027, issued on September 22, 2004 (revised on May 18, 2012), and PTC No. P-060200, issued on February 2, 2007. This permit does not release Lewis-Clark Terminal 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 Amber Rand, Air Quality Analyst, at (208) 799-4370 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 Carole Zundel at (208) 373-0477 or [carole.zundel@deq.idaho.gov](mailto:carole.zundel@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".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\CZ

Permit No. P-2013.0039 PROJ 61222

Enclosures

# AIR QUALITY

## PERMIT TO CONSTRUCT

**Permittee** Lewis-Clark Terminal  
**Permit Number** P-2013.0039  
**Project ID** 61222  
**Facility ID** 069-00010  
**Facility Location** 1534 3rd Avenue North  
Lewiston, ID 83501

### 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** August 23, 2013

*Carole Zundel*

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**Carole Zundel, Permit Writer**

*Mike Simon*

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**Mike Simon, Stationary Source Manager**

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# 1. Permit Scope

## Purpose

- 1.1 This is a revised permit to construct (PTC) for a country grain elevator.
- 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-060200, issued on February 2, 2007 and Permit to Construct No. P-2012.0027, issued on September 22, 2004 and revised on May 18, 2012.

## Regulated Sources

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

Table 1.1. Regulated sources.

Source	Control Equipment
North truck unloading	Baghouse Oil Spray
South truck unloading	Baghouse Oil Spray
East barge loading	Baghouse Oil spray
West truck unloading	Baghouse
West barge loading	Oil spray
Storage silos (bins) – North and South Truck Dumps	Oil spray
Storage silos (bins) – West Truck Dump	Oil spray

## 2. Country Grain Elevator Operations

### 2.1 Process Description

Lewis-Clark Terminal is a country grain elevator, and provides handling and interim storage for regional grain supplies destined for international export or interstate transportation. Process operations include unloading grain from trucks or railcars, grain transfers and storage to elevator(s), grain loading into barges on the Clearwater River, and loading of baghouse hopper dust into trucks for offsite shipment.

### 2.2 Control Device Descriptions

The PM<sub>10</sub> emissions from grain elevator operations are controlled as described in Table 2.1.

**Table 2.1. Country Grain Elevator Description.**

Sources	Control Equipment
North truck unloading Max Capacity: 150,000 TPY (This includes an additional 15,000 TPY) Max Operating Hrs: 3774	Baghouse 99.8% PM <sub>10</sub> control efficiency
South truck unloading Max Capacity: 375,000 TPY Max Operating Hrs: 3774	Baghouse 99.8% PM <sub>10</sub> control efficiency
East barge loading Maximum Throughput: 525,000 TPY	Baghouse 99.8% control efficiency Oil spray 70% control efficiency
West truck unloading Max Capacity: 225,000 TPY (This includes an additional 1,000 TPY) Max Operating Hrs: 3774	Baghouse 99.8% PM <sub>10</sub> control efficiency
West barge loading Maximum Throughput: 225,000 TPY	Oil spray 70% control efficiency
Storage silos (bins) – North and South Truck Dumps	None
Storage silos (bins) – West Truck Dump	None

[8/23/2013]

## Emission Limits

### 2.3 Opacity Limit

Emissions from the baghouse stacks, silo vents, or any other stack, vent, or functionally equivalent opening associated with the country grain elevator operations, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

## Operating Requirements

### 2.4 Throughput Limits

The total throughput from the North truck dump shall not exceed a maximum of 150,000 tons of grain in any consecutive 12-month period.

The total throughput from the South truck dump shall not exceed a maximum of 375,000 tons of grain in any consecutive 12-month period.

The total throughput from the West truck dump shall not exceed a maximum of 225,000 tons of grain in any consecutive 12-month period.

The total throughput from the East Barge Loading shall not exceed a maximum of 525,000 tons of grain in any consecutive 12-month period.

The total throughput from the West Barge Loading shall not exceed a maximum of 225,000 tons of grain in any consecutive 12-month period.

[8/23/2013]

### 2.5 Baghouse Operation

Particulate emissions from the West, North, and South truck dumps and the East barge shipping conveyor shall each be controlled by a baghouse as listed in the Country Grain Elevator table in this permit.

[8/23/2013]

### 2.6 Food-Grade Oil Dust Suppressant

The permittee shall apply food-grade oil to the grain at both barge loadout shipping conveyors to control particulate emissions.

[8/23/2013]

### 2.7 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.

## Monitoring and Recordkeeping Requirements

### 2.8 Baghouse/Filter System Procedures

Within 60 days of issuance of this permit, the permittee shall have developed a Baghouse/Filter System Procedures document for the inspection and operation of the baghouses/filter systems which control emissions from the West, North, and South truck dumps and the East barge shipping conveyor. The Baghouse/Filter System 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/Filter System Procedures document shall describe the procedures that will be followed to comply with General Provision 2 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/Filter System 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/filter system inspections in accordance with General Provision 7. 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/Filter System Procedures document shall 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/Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[8/23/2013]

### 2.9 Oil Throughput Monitoring

The permittee shall monitor and record monthly the amount of food-grade oil applied to the grain for particulate control at both barge loadout shipping conveyors.

[8/23/2013]

## 2.10 Throughput Monitoring

For any day and any month when grain is shipped or received, the permittee shall monitor and record the daily and monthly amount of grain received to demonstrate compliance with the throughput limits in this permit. Annual grain throughput shall be determined by summing each monthly total over the previous consecutive 12 months.

[8/23/2013]

## 2.11 Visible Emissions Monitoring

During any month that the facility is operated, the permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, including the baghouse stacks, during daylight hours and under normal operating conditions. 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 take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlines 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 its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. 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), and corrective action taken in response to the visible emissions, and the date corrective action was taken.

## 2.12 Fugitive Dust Control Monitoring

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 monthly 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.

## 2.13 Complaint Log

The permittee shall maintain a log of all fugitive dust complaints. The validity of the complaints shall be assessed and this assessment and any corrective action shall be recorded in the log.

### 3. General Provisions

#### General Compliance

- 3.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)  
[Idaho Code §39-101, et seq.]
- 3.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.  
[IDAPA 58.01.01.211, 5/1/94]
- 3.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.  
[IDAPA 58.01.01.212.01, 5/1/94]

#### Inspection and Entry

- 3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
  - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108]

#### Construction and Operation Notification

- 3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.  
[IDAPA 58.01.01.211.02, 5/1/94]
- 3.6 The permittee shall furnish DEQ written notifications as follows:
- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
  - A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

- 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; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

### **Performance Testing**

- 3.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 3.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 3.9 Within 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.

[IDAPA 58.01.01.157, 4/5/00]

### **Monitoring and Recordkeeping**

- 3.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

### **Excess Emissions**

- 3.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

### **Certification**

3.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

### **False Statements**

3.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

### **Tampering**

3.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

### **Transferability**

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

[IDAPA 58.01.01.209.06, 4/11/06]

### **Severability**

3.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]