



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor
Toni Hardesty, Director

June 6, 2005

Certified Mail No. 7000 1670 0013 8128 3227

Mick Cowger
Crookham Company
301 Warehouse Street
Caldwell, ID 83605

RE: Facility ID No. 027-00020, Crookham Company, Caldwell
Final Permit Letter

Dear Mr. Cowger:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-040002 to the Crookham Company, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This PTC is effective immediately and replaces Crookham Company's Tier II Operating Permit No. 027-00020, issued January 18, 2002, the terms and conditions of which shall no longer apply. This PTC does not release the Crookham Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Boise 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 Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/BR/DH/sd
Enclosures

Permit No. P-040002



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-040002

FACILITY ID No.: 027-00020

AQCR: 64

CLASS: B

SIC: 0723

ZONE: 11

UTM COORDINATE (km): 524.0, 4835.1

1. PERMITTEE

Crookham Company

2. PROJECT

Permit to Construct Modification – Increased production limits

3. MAILING ADDRESS

301 Warehouse Street

CITY

Caldwell

STATE

ID

ZIP

83605

4. FACILITY CONTACT

Mick Cowger

TITLE

Plant Supervisor

TELEPHONE

(208) 459-7451

5. RESPONSIBLE OFFICIAL

Mick Cowger

TITLE

Plant Supervisor

TELEPHONE

(208) 459-7451

6. EXACT PLANT LOCATION

301 Warehouse Street, Caldwell

COUNTY

Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Seed processing

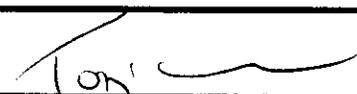
8. GENERAL CONDITIONS

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 or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) 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.

This permit is not transferable to another person, place, or piece or set of 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: June 6, 2005

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
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
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator

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Permittee:	Crookham Company	Facility ID No. 027-00020	Date Issued:	June 6, 2005
Location:	Caldwell, Idaho			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 The purpose of this permit is to allow the Crookham Company to increase their annual production and hours of operation limits.
- 1.2 This permit to construct (PTC) replaces Tier II Operating Permit No. 027-00020, issued January 18, 2002, the terms and conditions of which shall no longer apply.

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Seed processing	Various cyclones and baghouses
3	Fugitive dust	Fugitive dust control plan

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2. SEED PROCESSING OPERATIONS

2.1 Process Description

Crookham Company processes various types of seeds from both local and foreign suppliers. The seeds are dried, treated, and bagged.

Emission Limits

2.2 Visible Emissions

Emissions from any stack, vent, or other functionally equivalent openings associated with the seed processing operations shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period in accordance with IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.3 Material Throughput

The maximum throughput of the receiving area shall not exceed 500 tons per day of raw material. The permittee shall not process more than 20,000 tons of seed material per any consecutive 12-month period (T/yr).

2.4 Operating Hours

In each process (receiving, husking, drying, shelling, sizing, electronic sorting, and bagging), the hours of operation shall not exceed 3,000 hours per any consecutive 12-month period (hr/yr).

2.5 Process Requirements

The sheller, husker, scalper, treating and bagging, and electronic sorter emissions shall be controlled by baghouses.

Monitoring Requirements

2.6 Monitor Operating Parameters

The permittee shall monitor and record the amount of seed material received each day that the receiving area is operating. Additionally, the permittee shall monitor and record the facility-wide hours of operation each week, during weeks that the facility is operating. Each week, the permittee shall calculate the total amount of material received and the hours of operation for the previous consecutive 12-month period. The most recent two-year compilation of records shall be kept onsite and made available to DEQ representatives upon request.

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3. FUGITIVE DUST CONTROL

Operating Requirements

3.1 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent 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 particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
- 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, when practical, 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.

The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

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 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.

3.2 Fugitive Dust Management

In addition to the general fugitive dust requirements above, the following fugitive dust control techniques shall be utilized to control fugitive dust from the receiving area and unpaved parking lots on the facility:

- Wind breaks shall be used around the receiving area whenever material is received.
- Construct cloth barriers, or equivalent, around the receiving hopper. The permittee shall assess the effectiveness of the barrier and add more coverage if it is necessary to control fugitive dust emissions.
- Install water application apparatus (spray nozzles) on the hopper and shaker. These sprays shall be activated when necessary for reasonable control of fugitive dust.

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- Apply dust suppressant to the facility's unpaved parking lots as necessary to control fugitive dust.
- Conduct daily monitoring of the receiving area once per day during receiving operations by personnel certified in visible emissions evaluation. If fugitive emissions are observed at the receiving area the permittee shall take immediate corrective action.
- A log shall be maintained for the receiving area, and the following information, at a minimum, shall be entered into the log whenever the receiving area is in operation: the date and hours of operation of the receiving area; the date, time, and results of each fugitive dust inspection; and, if required, a detailed description including the results of any fugitive dust control procedure(s) employed.

3.3 Visible Emission Limits

Visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by Environmental Protection Agency Reference Method 22, as described in 40 CFR 60, Appendix A-7, or a DEQ-approved alternative method.

Monitoring Requirements

3.4 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 assess the effectiveness of the fugitive emissions controls. 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.

3.5 Visible Emissions Monitoring

The permittee shall conduct a monthly visible emissions inspection at the property boundary using the methods in 40 CFR 60, Appendix A-7 Method 22, or a DEQ-approved alternative. If visible emissions are detected, the permittee shall conduct a facility-wide inspection of visible emissions to determine the cause of the visible emissions and take corrective action as expeditiously as possible. The permittee shall maintain records of the results of each visible 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 visible emissions were present (if observed), any corrective action taken in response to the visible emissions, and the date the corrective action was taken.

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4. 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 5 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.