



# **Air Quality Permitting Statement of Basis**

**January 6, 2006**

**Permit to Construct No. P-050416**

**Lansing Grain Company, LLC**

**Facility ID No. 047-00010**

**Prepared by:**

**Robert Baldwin, Associate Engineer  
AIR QUALITY DIVISION**

**FINAL PERMIT**

## **Acronyms, Units, and Chemical Nomenclature**

<b>AFS</b>	<b>AIRS Facility Subsystem</b>
<b>AIRS</b>	<b>Aerometric Information Retrieval System</b>
<b>AQCR</b>	<b>Air Quality Control Region</b>
<b>CO</b>	<b>carbon monoxide</b>
<b>EPA</b>	<b>U.S. Environmental Protection Agency</b>
<b>HAPs</b>	<b>hazardous air pollutants</b>
<b>IDAPA</b>	<b>a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act</b>
<b>MACT</b>	<b>Maximum Achievable Control Technology</b>
<b>NESHAP</b>	<b>National Emissions Standards for Hazardous Air Pollutants</b>
<b>NO<sub>x</sub></b>	<b>oxides of nitrogen</b>
<b>NSPS</b>	<b>New Source Performance Standards</b>
<b>PM</b>	<b>particulate matter</b>
<b>PM<sub>10</sub></b>	<b>particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers</b>
<b>PSD</b>	<b>Prevention of Significant Deterioration</b>
<b>PTC</b>	<b>permit to construct</b>
<b>SIP</b>	<b>State Implementation Plan</b>
<b>SO<sub>2</sub></b>	<b>sulfur dioxide</b>
<b>UTM</b>	<b>Universal Transverse Mercator</b>
<b>VOC</b>	<b>volatile organic compounds</b>

## 1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

## 2. FACILITY DESCRIPTION

Lansing Grain Company is a country elevator that receives grain by truck from farms during the harvest season. The grain is stored and shipped by railcar or truck to various destinations. Particulate matter (PM and PM<sub>10</sub>) emissions are the only regulated air pollutants emitted and they are primarily generated from the unloading of the trucks, grain transfers at the elevator and loading of trucks or railcars. The primary control device for the emissions is a baghouse.

## 3. FACILITY / AREA CLASSIFICATION

Lansing Grain Company LLC is defined as a true minor facility because its potential to emit all regulated air pollutants is less than all major source thresholds.

The facility is located within AQCR 63 and UTM zone 11. The facility is located in Gooding County which is designated unclassifiable for all criteria air pollutants.

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at Lansing Grain Company LLC. This required information is entered into the EPA AIRs database.

## 4. APPLICATION SCOPE

Lansing Grain Company LLC has submitted a permit to construct application for a revision to the facility's existing permit. The revision is a change in the name and ownership of the facility. The existing permit, PTC No. 047-00010, was issued to General Mills Operations, Inc. on January 28, 2000. Emissions do not increase as a result of this permit revision.

### 4.1 *Application Chronology*

October 14, 2005	Application received
November 28, 2005	Application declared complete

## 5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC action.:

### 5.1 *Equipment Listing*

The following is a list of the equipment with specific permit conditions:

- Grain Handling Baghouse Stack EP-1
- Truck Unloading Pit 4
- Rail Car Unloading/Loading Pit 5
- Leg 4

- Leg 5

## **5.2 Emissions Inventory**

There is no increase in emissions as a result of this name change.

## **5.3 Fee Review**

This permit application is exempt from the permit to construct application fee because it is a change in name and no other review or analysis is required per IDAPA 58.01.01.224.03. The permit to construct is exempt from the permit processing fee for the same reason per IDAPA 58.01.01.225. The source is a minor source and not subject to registration fees.

## **5.4 Regional Review of Draft Permit**

The Twin Falls Regional Office was contacted by phone on November 29, 2005 regarding this permitting action. The Twin Falls Regional office did not request to review a draft permit for a name change only.

## **5.5 Facility Review of Draft Permit**

A facility draft permit was not requested by the facility.

## **6. PUBLIC COMMENT**

An opportunity for public comment period on the PTC application is not required to be provided in accordance with IDAPA 58.01.01.209.04, because this is a revision to a PTC with no increase in emissions.

## **7. RECOMMENDATION**

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that Lansing Grain Company LLC be issued PTC No. P-050416 for the grain storage elevator in Bliss. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

REB/sd

Permit No. P-050416

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**Appendix A**

**Lansing Grain Company LLC, Bliss**

**P-050416**

**AIRS Table**

# AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM

**Facility Name:** Lansing Grain Company LLC  
**Facility Location:** Intersection of US Highway 26 and Interstate 84, ½ mile East of Bliss  
**AIRS Number:** 047-00010

## AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION
POLLUTANT							A – Attainment U – Unclassifiable N – Nonattainment
SO <sub>2</sub>	B						U
NO <sub>x</sub>	B						U
CO	B						U
PM <sub>10</sub>	B						U
PT (Particulate)	B						U
VOC	B						U
THAP (Total HAPs)	B						
			<b>APPLICABLE SUBPART</b>				

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).