



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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C.L. "Butch" Otter, Governor
John H. Tippetts, Director

September 4, 2015

Chris Casias, Plant Manager
Grain Craft
463 W. Highway 26
Blackfoot, Idaho 83221

RE: Facility ID No. 011-00033, Project No. 61583, Grain Craft, Blackfoot
Permit to Construct - Transfer of Ownership

Dear Mr. Casias:

This letter acknowledges receipt on August 21, 2015, of a request for the transfer of ownership for a Permit to Construct (PTC) revision from Pendleton Flour Mills, LLC to Grain Craft, in accordance with IDAPA 58.01.01.209.04 (Rules for the Control of Air Pollution in Idaho). The transfer of ownership request is based on the following information:

Current Permittee Information

Permittee: Pendleton Flour Mills, LLC
Facility Location: 463 W. Highway 26, Blackfoot, Idaho 83221
Person to Contact: Greg Loftus, Assistant Plant Manger
Phone Number: 208-785-2800
Responsible Official: Anthony Flagg, President CEO
Phone Number: 541-276-6511

Proposed Permittee Information

Permittee: Grain Craft
Facility Location: 463 W. Highway 26, Blackfoot, Idaho 83221
Person to Contact: Chris Casias, Plant Manager
Phone Number: 208-785-2800, Extension 16
E-mail Address: ccasias@graincraft.com
Responsible Official: Chris Casias, Plant Manager
Phone Number: 208-785-2800, Extension 16

The following table lists the permits subject to the requested transfer of ownership:

PERMITS SUBJECT TO THIS TRANSFER OF OWNERSHIP

Permit Type	Current Permit No.	Issuance Date	Project No. (If Assigned)	Revised Permit No.	Issuance Date	Project No. (If Assigned)
PTC	011-00033	May 31, 2001	P-000320	P-2015.0044	August 28, 2015	61583

DEQ is only revising the format of the PTC. All other information in the permit remains the same.

Attached to this letter is revised PTC No. P-2015.0044, Project No. 61853, reflecting the transfer of ownership. This PTC replaces PTC No. 011-00033, issued May 31, 2001. The effective date of the transfer is the date listed on the cover page of the permit, which is the same as the date of this letter. DEQ recommends that you maintain a copy of this letter for your records.

This transfer does not release Grain Craft from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. If you have any questions, please contact Thomas Dalzell at phone number: 208-373-0501 or e-mail address: thomas.dalzell@deq.idaho.gov.

Sincerely,

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

Mike Simon
Stationary Source Program Manager
Air Quality Division

Attachment

Permit No. P-2015.0044 PROJ 61583

MS/td

Air Quality

PERMIT TO CONSTRUCT

Permittee Grain Craft
Permit Number P-2015.0044
Project ID 61583
Facility ID 011-00033
Facility Location 463 W. Highway 26
Blackfoot, Idaho 83221

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 September 4, 2015



Thomas Dalzell, Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This PTC reflects the new and current ownership by Grain Craft
- 1.2 This PTC replaces Permit to Construct No. 011-00033, issued on May 31, 2001.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Flour Megamill	Baghouse

2 Flour Megamill

2.1 Process Description

In general, the wheat flour milling process consists of five main steps: (1) receiving, preliminary cleaning, and storing; (2) cleaning the grain; (3) grain tempering or conditioning; (4) milling the grain into flour and its byproducts; and (5) storing and shipping the finished product.

Wheat arrives at a mill and is preliminary cleaned and conveyed to storage bins. As grain is needed for milling, it is withdrawn and conveyed to the mill area where it enters an aspirator to remove dust and lighter impurities, and then passes over a magnetic separator to remove iron and steel particles. From the magnetic separator, the wheat enters a disc separator designed to catch individual grains of wheat and reject larger or smaller material, and then the wheat enters a stoner that removes stones, sand, flints, and balls of caked earth or mud. The wheat then moves into a scourer, which buffs each kernel and removes more dust and loose bran (hull or husk). Following the scouring step, the grain is sent to the tempering bins where water is added to raise the moisture of the wheat to make it easier to grind. When the grain reaches the proper moisture level, it is passed through an impact machine as a final cleaning step. The wheat flows into a grinding bin and then into the mill itself.

The grain kernels are broken open in a system of breaks by sets of corrugated rolls, each set taking feed from the preceding one. After each break, the grain is sifted. The sifting system is a combination of sieving operations and air aspirators (purifiers). The flour then passes through smooth reducing rolls, which further reduce the flour-sized particles and facilitate the removal of the remaining bran and germ particles. Sieves are used after the reducing rolls to divide the stock into over-sized particles, which are sent back to the reducing rolls, and flour, which is removed from the milling system.

Flour stock is transported from the milling system to bulk storage bins and subsequently packaged for shipment.

Emission Limits

2.2 Emission Limits

Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM₁₀) emissions from the flour megamill stacks shall not exceed any corresponding emission rate limits listed in Table 2 of this permit.

Table 2 Emissions Units Descriptions

Source Description	PM ₁₀	
	(lb/hr)	T/yr
EP-1 Elevator Aspiration	0.026	0.1
EP-2 Cleaning House Aspiration	0.026	0.1
EP-3 Pneumatic Mill	0.608	2.7
EP-4 Pneumatic Mill	0.608	2.7
EP-5 Purifier and Aspiration	0.026	0.1
EP-6 Patent to Rebolt Lift	0.146	0.6
EP-7 Cake to Rebolt Lift	0.146	0.6
EP-8 Aspiration and Bin Filling	0.026	0.1
EP-9 Bulk Storage Aspiration	0.026	0.1
EP-10 Bulk Storage to Lift	0.146	0.6
EP-11 Bulk Storage Flour Packing	0.146	0.6
EP-12 Bulk Storage Loading Bin LC1	0.024	0.1
EP-13 Bulk Storage Loading Bin LC2	0.024	0.1
EP-14 Bulk Storage Loading Bin LC3	0.024	0.1
EP-15 Bulk Storage Loading Bin LT1	0.024	0.1
EP-16 Bulk Storage Loading Bin LT2	0.024	0.1
EP-17 Bulk Storage Loading Bin LT3	0.024	0.1
EP-18 Feed Storage Millfeed	0.146	0.6

- a. In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping 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.

2.3 Opacity Limit

Emissions from any point of emission associated with the four megamill shall not exceed 20 percent opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.4 Throughput Limits

The maximum daily throughput of the flour megamill shall not exceed 868 tons per day (T/day). The maximum annual throughput of the flour megamill shall not exceed 316,838 tons per any consecutive 12-month period (T/yr).

2.5 Baghouse Pressure Drop

The pressure drop across each megamill baghouse shall be maintained within the manufacturers operation and maintenance (O&M) manual specifications. Documentation of the operating pressure drop specifications for the baghouses shall remain on site at all times and shall be made available to Department representatives upon request.

2.6 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter 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 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 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; or
- Prompt removal of earth or other stored material from streets, where practical.

Monitoring and Recordkeeping Requirements

2.7 Throughput Monitoring

Each month, the permittee shall record the throughput of the flour megamill for the most recent 12-month period. The most recent two years' compilation of data shall be kept on site and shall be made available to Department representatives upon request.

2.8 Monitor Operating Parameters

The permittee shall monitor and record the most recent two years' compilation of records shall be kept on site and shall be made available to Department representatives upon request, as follows:

- The throughput of the flour megamill in tons per day (T/day) and tons per any consecutive 12- month period (T/yr); and
- The pressure drop across each megamill baghouse on a daily basis.

2.9 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an operations and maintenance (O&M) manual for the air pollution control devices that describes the procedures that will be followed to comply with General Provision B and the air pollution control device requirements contained in this permit. The manual shall remain on site at all times and shall be available to Department representatives upon request.

Reporting Requirements

2.10 Certification of Documents

All documents submitted to the Department, 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.

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 60 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 and 4/11/15]

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]