STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

June 9, 2016

Tyson Smith, Country Head USA
Nunhems USA, Inc.
1200 Anderson Corner Rd.
Parma, ID 83660

RE: Facility ID No. 027-00130, Nunhems USA, Inc., Parma
Final Permit Letter

Dear Mr. Smith:

The Department of Environmental Quality (DEQ) is issuing initial Permit to Construct (PTC) No. P-2015.0017 Project 61508 to Nunhems USA, Inc., located at Parma, for a seed treatment processing facility. 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 April 23, 2015.

This permit is effective immediately. This permit does not release Nunhems USA, Inc. 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 Thomas Krinke, Boise Regional Office Air Quality Science Officer, (208) 373-0550, 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 Bill Rogers at (208) 373-0502 or william.rogers@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\BR\tc

Permit No. P-2015.0017 PROJ 61508

Enclosures

Printed on Recycled Paper

AIR QUALITY

PERMIT TO CONSTRUCT

Permittee	Nunhems USA, Inc.
Permit Number	P-2015.0017
Project ID	61508
Facility ID	027-00130
Facility Location	1200 Anderson Corner Road, Parma, ID 83660

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 June 9, 2016

Bill Rogers for

Randy Stegen, Permit Writer

Dan Pittman for

Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is the initial permit to construct (PTC) for a seed processing facility.

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	Caterpillar Emergency Generator Manufacturer: Caterpillar Model: C9-2008 Manufacture Date: 2008 Rating: 398 bhp Fuel: ULSD only	N/A
2	Generac Emergency Generator Manufacturer: New Holland Model: SD080 Manufacture Date: 2002 Rating: 125 bhp Fuel: ULSD only	N/A
2	Cummins Emergency Generator Manufacturer: Cummins Model: QSK50-G4 NR2 Manufacture Date: 2009 Rating 2,205 bhp Fuel: ULSD only	N/A
3	DC-1 Seed Conditioning (Lines 3-4)	CSL Dust Collector
3	DC-2 Seed Conditioning (AIM Blending Line)	CSL Dust Collector
3	DC-3 Seed Conditioning (Lines 1-2)	CSL Dust Collector
3	DC-4 Seed Conditioning (Carrot Seed Brushing)	CSL Dust Collector
3	DC-5 Seed Conditioning (Scalping Lines 3-4)	CSL Dust Collector
3	DC-6 Seed Conditioning (Scalping Lines 1-2)	CSL Dust Collector
3	DC-7 Seed Conditioning (Scalping and Brush Lines)	CSL Dust Collector
3	DC-8 Seed Packaging and Shipping	CSL Dust Collector
3	FARR 1 Seed Treatment (Film Coating)	FARR Cartridge Filter
3	FARR 2 Seed Treatment (Film Coating)	FARR Cartridge Filter
3	FARR 3 Seed Enhancement (Pelleting)	FARR Cartridge Filter
3	FARR 4 Seed Enhancement (Pelleting)	FARR Cartridge Filter
3	FARR 5 Warehousing (Bulk Unloading)	FARR Cartridge Filter
3	FARR 6 Warehousing (Bulk Unloading)	FARR Cartridge Filter

Permit Section	Source	Control Equipment
3	MR BH 1 Seed Enhancement (Priming)	Murphy-Rodgers Baghouse
3	HERD 1 Seed Enhancement (Powder/Blending)	Herding Filtration Unit
3	HERD 2 Seed Enhancement (Pelleting)	Herding Filtration Unit
3	HEAT 1 Two Propane Building Heaters	None
3	HEAT 2 Four Propane Building Heaters	None
3	DRYER 1 Two Enclosed Propane Seed Dryers	None
3	DRYER 2 Propane Seed Dryer	None
3	DRYER 3 Propane Seed Dryer	None
3	DRYER FARR 3 Two Propane Seed Dryers	None
3	DRYER FARR 4 Three Propane Seed Dryers	None
3	FUME Fumigation Chamber	None

2 Emergency IC Engines

2.1 Process Description

Three emergency IC engines are utilized to provide backup power to the facility. The Caterpillar and Cummins engines are subject to requirements of 40 CFR 60, Subpart IIII. The Generac Generator engine is subject to requirements of 40 CFR 63, Subpart ZZZZ.

2.2 Control Device Descriptions

Table 2.1 Emergency IC Engines Description

Emissions Units / Processes	Control Devices	Emission Points
Caterpillar Emergency Generator	N/A	IC Engine Exhaust Stack
Generac Emergency Generator	N/A	IC Engine Exhaust Stack
Cummins Emergency Generator	N/A	IC Engine Exhaust Stack

Emission Limits

2.3 Emission Limits

The emissions from the emergency engines shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Emergency Engines Emission Limits[a]

Source Description	$PM_{10}/PM_{2.5}$[b]		SO_2		NO_X		CO		VOC	
	lb/hr[c]	T/yr[d]	lb/hr[c]	T/yr[d]	lb/hr[c]	T/yr[d]	lb/hr[c]	T/yr[d]	lb/hr[c]	T/yr[d]
Caterpillar Emergency Generator	0.069	0.017	0.82	.020	2.61	0.65	0.32	0.08	0.98	0.25
Generac Emergency Generator	0.270	0.068	0.26	0.06	1.86	0.46	0.52	0.13	0.06	0.02
Cummins Emergency Generator	0.146	0.036	0.53	0.13	27.71	6.93	2.77	0.69	0.39	0.10

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 10 micrometers (PM_{10}) or 2.5 micrometers ($PM_{2.5}$), 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.

2.4 Opacity Limit

Emissions from the emergency IC engine stacks, or any other stack, vent, or functionally equivalent opening associated with the emergency IC engines, 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

2.5 ULSD Fuel Specifications

ULSD fuel oil is fuel which meets ASTM Grades 1 or 2, or a mixture of ASTM Grades 1 and 2, and which has a maximum sulfur content of 0.0015% (15 ppm) by weight.

40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines - Applicable to the Caterpillar and Cummins Emergency IC Engines

2.6 Certification to Emission Standards

In accordance with 40 CFR 60.4202(a)(2), the permittee must certify the Caterpillar and Cummins emergency IC engines to the emission standards for new nonroad CI engines in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants.

2.7 Emergency IC Engine Emission Standards

In accordance with 40 CFR 60.4206, the permittee shall operate and maintain the Caterpillar and Cummins emergency IC engines according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer, over the entire life of the engine.

2.8 Emergency IC Engine Fuel Requirements

In accordance with 40 CFR 60.4207(a), fuel purchased on or after October 1, 2010 for use in the Caterpillar and Cummins emergency IC engines shall contain a maximum sulfur content of 15 ppm.

2.9 Emergency IC Engine Monitoring Requirements

In accordance with 40 CFR 60.4209(a), the permittee shall install a non-resettable hour meter on the Caterpillar and Cummins emergency IC engines prior to startup.

2.10 Emergency IC Engine Emission Standards

In accordance with 40 CFR 60.4211(c), the Caterpillar and Cummins emergency IC engines must be installed and configured according to the manufacturer's emission-related specifications.

2.11 Emergency IC Engine Compliance Requirements

In accordance with 40 CFR 60.4211(f), the permittee must operate the Caterpillar and Cummins emergency IC engines according to the requirements below. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, is prohibited. If the permittee does not operate the engine according to the requirements, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

- There is no time limit on the use of emergency stationary ICE in emergency situations.
- The permittee may operate the emergency stationary ICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed counts as part of the 100 hours per calendar year.
    - Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

- Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
- Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

- Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

2.12 Emergency IC Engine Notification and Recordkeeping Requirements

In accordance with 40 CFR 60.4214(b), if the stationary IC internal combustion engine is an emergency stationary internal combustion engine, the permittee is not required to submit an initial notification. Starting with the model years in table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time.

40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines – Applicable to the Generac Emergency IC Engine

2.13 General Compliance

In accordance with 40 CFR 63.6605, the permittee shall operate and maintain the Generac Generator engine and associated pollution control equipment (where applicable) in a manner that minimizes emissions.

2.14 General Maintenance

In accordance with 40 CFR 63.6625(e), the permittee must operate and maintain the Generac Generator engine according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

2.15 Engine Startup

In accordance with 40 CFR 63.6625(h), the Generac Generator engine's time spent at idle during startup shall be minimized to a period needed for appropriate and safe loading of the engine, but not to exceed 30 minutes.

2.16 Emergency IC Engine Operation and Maintenance Requirements

In accordance with 40 CFR 63.6603(a), the permittee must comply with the following maintenance schedule for the Generac Generator engine:

- Change the engine oil and oil filter every 500 hours of operation or annually, whichever comes first.
- Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first.
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first.

2.17 Emergency IC Engine Fuel Requirements

In accordance with 40 CFR 63.6604(b), the permittee must only use diesel fuel that meets the requirements in 40 CFR 80.510(b) in the Generac Generator engine, except that any existing diesel fuel purchased prior to January 1, 2015 may be used until depleted.

2.18 Emergency IC Engine Monitoring Requirements

In accordance with 40 CFR 63.6625(f), the permittee shall install a non-resettable hour meter on the Generac Generator engine if one is not already installed.

2.19 Recordkeeping Requirements

In accordance with 40 CFR 63.6660, the permittee must maintain records in a form suitable and readily available for expeditious review and must be readily accessible for at least five years after the date of each occurrence.

Monitoring and Recordkeeping Requirements

2.20 Fuel Specifications Recordkeeping

On an as-received basis for each shipment of distillate fuel oil for the Caterpillar, Cummins, and Generac Generator emergency IC engines, the permittee shall maintain supplier verified and certified information documenting the percent sulfur content by weight of the fuel.

2.21 Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- Applicable requirements of Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60
- Applicable requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS and NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

3 Seed Processing

3.1 Process Description

Nunhems USA, Inc. operates a seed treatment processing facility. There are five processing stages:

- **Warehousing** – Seeds are received at the facility and inspected to determine if they are "dirt seed" or "clean seed". Both dirt seed and clean seed are sampled and analyzed to determine trueness to type, purity, vigor, seed health, and seed count. Seeds are then analyzed for moisture content and dried, if needed. A fumigation process may also be performed, as needed, in order to eliminate insect infestation that may damage the seeds. Fumigation is accomplished using phosphine gas within a fumigation chamber.
- **Seed Conditioning** – Seed conditioning, also referred to as seed cleaning or seed milling, is the process of extracting the clean, pure seed from the plant parts that came with the seed from the field. Product considered dirt seed is received and stored within an adjacent building before it is conditioned in the conditioning building. Once received in the conditioning building, dirt seed goes through a scalping, or pre-cleaning, process where product is run across an air screen cleaner to remove plant parts from the seed. The seed then goes through another process known as brushing, where the awns, or hairs, of the seed are removed. After scalping and/or brushing, the seed is sent through the conditioning lines where they are further cleaned, density separated, color sorted, and size sorted. If the quality standards are met the seed is moved to climate controlled storage.
- **Seed Enhancement** – During the seed enhancement process, seeds are disinfected using a 1-percent chlorine solution, primed (pre-germinated), dried, sorted, and pelleted (the application of a polymer and filler to the seed to create a more uniform shape). Additional drying may be conducted following the application of the polymer in the pelleting process.
- **Seed Treatment** – After seed enhancement, seeds are sent for treatment where a thin layer of water-based polymer is applied in order to encapsulate the seed and hold pesticide to the seed.
- **Packaging and Shipment** – Seed is packaged in a variety of containers (pails, cans, pouches). The packaged seed can be stocked on site or distributed for sale.

Nunhems maintains eight Carothers dust collectors, six FARR cartridge dust collectors, one Murphy Rodgers baghouse, and two Herding filtration units to control particulate matter. The process heaters and building heaters use propane exclusively as the fuel source.

3.2 Control Device Descriptions

PM_{10} emissions from the seed processing operations are controlled by dust collectors and baghouses as described in Table 3.1. The seed dryers and heaters are propane fueled and emissions are uncontrolled.

Table 3.1 Seed Processing Description

Emissions Units / Processes	Control Devices	Emission Points
DC-1 Seed Conditioning (Lines 3-4)	CSL Dust Collector No. 1 Control Efficiency: 99.995%	Dust Collector Outlet
DC-2 Seed Conditioning (AIM Blending Line)	CSL Dust Collector No. 2 Control Efficiency: 99.995%	Dust Collector Outlet
DC-3 Seed Conditioning (Lines 1-2)	CSL Dust Collector No. 3 Control Efficiency: 99.995%	Dust Collector Outlet
DC-4 Seed Conditioning (Carrot Seed Brushing)	CSL Dust Collector No. 4 Control Efficiency: 99.995%	Dust Collector Outlet
DC-5 Seed Conditioning (Scalping Lines 3-4)	CSL Dust Collector No. 5 Control Efficiency: 99.995%	Dust Collector Outlet
DC-6 Seed Conditioning (Scalping Lines 1-2)	CSL Dust Collector No. 6 Control Efficiency: 99.995%	Dust Collector Outlet
DC-7 Seed Conditioning (Scalping and Brush Lines)	CSL Dust Collector No. 7 Control Efficiency: 99.995%	Dust Collector Outlet
DC-8 Seed Packaging and Shipping	CSL Dust Collector No. 8 Control Efficiency: 99.995%	Dust Collector Outlet
FARR 1 Seed Treatment (Film Coating)	FARR Cartridge Collector No. 1 Control Efficiency: 99.99%	Cartridge Collector Outlet
FARR 2 Seed Treatment (Film Coating)	FARR Cartridge Collector No. 2 Control Efficiency: 99.99%	Cartridge Collector Outlet
FARR 3 Seed Enhancement (Pelleting)	FARR Cartridge Collector No. 3 Control Efficiency: 99.99%	Cartridge Collector Outlet
FARR 4 Seed Enhancement (Pelleting)	FARR Cartridge Collector No. 4 Control Efficiency: 99.99%	Cartridge Collector Outlet
FARR 5 Warehousing (Bulk Unloading)	FARR Cartridge Collector No. 5 Control Efficiency: 99.99%	Cartridge Collector Outlet
FARR 6 Warehousing (Bulk Unloading)	FARR Cartridge Collector No. 6 Control Efficiency: 99.99%	Cartridge Collector Outlet
MR BH 1 Seed Enhancement (Priming)	Murphy-Rodgers Baghouse Control Efficiency: 99.9%	Baghouse Outlet
HERD 1 Seed Enhancement (Powder/Blending)	Herding Filtration Unit No. 1 Control Efficiency: 99.97%	Filtration Unit Outlet
HERD 2 Seed Enhancement (Pelleting)	Herding Filtration Unit No. 2 Control Efficiency: 99.97%	Filtration Unit Outlet
HEAT 1 Two Propane Building Heaters	Two Propane Building Heaters Manufacturer: RAE Corporation Model No. RCUAC4CD50-H4 Rating: 1 MMBtu/unit (each)	Combustion Unit Exhaust
HEAT 2 Four Propane Building Heaters	Four Propane Building Heaters South of Building "L" Rating: 0.25 MMBtu/hr (each)	Combustion Unit Exhaust

Emissions Units / Processes	Control Devices	Emission Points
DRYER 1 Two Enclosed Propane Seed Dryers	Two Enclosed Propane Seed Dryers within Building "L" Rating: 1 MMBtu/hr (each)	Combustion Unit Exhaust
DRYER 2 Propane Seed Dryer	Propane Seed Dryer Northwest of Building "K" Rating: 2.5 MMBtu/hr	Combustion Unit Exhaust
DRYER 3 Propane Seed Dryer	Propane Seed Dryer Northwest of Building "L" Rating: 2.0 MMBtu/hr	Combustion Unit Exhaust
DRYER FARR 3 Two Propane Seed Dryers	Two Propane Seed Dryers inside Building "L" Vents through FARR 3 Rating: 0.5 MMBtu/hr (each)	Combustion Unit Exhaust
DRYER FARR 4 Three Propane Seed Dryers	Three Propane Seed Dryers inside Building "L" Vents through FARR 4 Rating: 0.5 MMBtu/hr (each)	Combustion Unit Exhaust
FUME Fumigation Chamber	Fumigation Chamber Length: 60'9" Width: 9'6" Interior Height: 13'1"	Emissions are uncontrolled from fumigation chamber

Emission Limits

3.3 Opacity Limit

Emissions from any baghouse, dust collector, filtration unit, heater, or dryer stack, or any other stack, vent, or functionally equivalent opening associated with the baghouses, dust collectors, filtration units, heaters, or dryers, 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.

3.4 Emission Limits

PM_{10}, $PM_{2.5}$, VOC, and NO_x emissions from the seed processing operations shall not exceed any corresponding emissions rate limits listed in the following table.

Table 3.2 SEED PROCESSING OPERATIONS EMISSIONS LIMITS

Source Description	PM_{10}		$PM_{2.5}$		VOC		NO_x	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Seed Processing Operations	1.20	4.90	0.32	1.38	0.043	0.19	1.27	2.65

Operating Requirements

3.5 Seed Processing Throughput Limit

To demonstrate compliance with the Emissions Limits Permit Condition, the permittee shall not process more than 10,000 tons of seed per any consecutive 12-month period.

3.6 Fuel Usage

The building heaters and seed dryers shall only use propane fuel.

3.7 Dryer 2 Operating Limit

Dryer 2 may only be operated between the hours of 8:00 a.m. and 6:00 p.m. daily for a total of 10 hours per day and 3,650 hours per year.

3.8 Dryer 3 Operating Limit

Dryer 3 may only be operated between the hours of 6:00 a.m. and 4:00 p.m. for a total of 10 hours per day. Dryer 3 may only be operated during the months of August and September and only from Monday through Saturday. Operation of Dryer 3 is limited to a maximum of 530 hours per year.

3.9 Baghouse, Dust Collector, and Filtration Unit Operations and Maintenance Manual

The permittee shall develop and maintain an Operations and Maintenance (O&M) manual for the baghouses, dust collectors, and filtration units. The manual must describe the procedures that will be followed to comply with the General Compliance General Provision of this permit, the manufacturer's specifications, and all other permit requirements for the baghouses, dust collectors, and filtration units. The manual 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.

At a minimum, the O&M manual shall:

- Be based on manufacturer's information to the extent practical. When the manufacturer's information is not used, other supporting information such as operating parameters measured during a successful performance test shall be included in the manual.
- Include procedures to determine if bags, cartridges, or filters are ruptured and if bags, cartridges, or filters are not appropriately secured in place.
- Include the frequency that the physical inspections are to occur.
- Include a record of the results of each inspection and any corrective action taken in response to the results of the inspection.

The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

3.10 CSL Dust Collector Filter Bag Requirements

The CSL Dust Collectors shall be equipped with filter bags which have a minimum collection efficiency of 99.995% for PM_{10}.

3.11 FARR Cartridge Collector Filter Requirements

The FARR Cartridge Collectors shall be equipped with filter cartridges which have a minimum collection efficiency of 99.99% for PM_{10}.

3.12 Murphy-Rodgers Baghouse Filter Requirements

The Murphy-Rodgers Baghouse shall be equipped with filter bags which have a minimum collection efficiency of 99.9% for PM_{10}.

3.13 Herding Filtration Unit Filter Requirements

The Herding Filtration Units shall be equipped with filter elements which have a minimum collection efficiency of 99.97% for PM_{10}.

3.14 Maintenance and Operation of the Baghouses, Dust Collectors, and Filtration Units

The permittee shall maintain and operate the baghouses, dust collectors, and filtration units

according to manufacturer's and Operation and Maintenance Manual specifications and recommendations to demonstrate compliance with the Emission Limits Permit Condition and Opacity Limit Permit Condition. The baghouses, dust collectors, and filtration units shall be in operation whenever the respective seed processing lines are in operation.

Monitoring and Recordkeeping Requirements

3.15 Seed Throughput Monitoring

The permittee shall monitor and record the monthly and annual seed throughput in tons from the seed processing operations in order to demonstrate compliance with the Seed Processing Throughput Limit Permit Condition. Annual seed throughput shall be determined by summing total monthly seed throughput over each consecutive 12-month period.

3.16 Dryer 2 and Dryer 3 Monitoring

The permittee shall monitor and record the dates and times of operation for Dryer 2 and Dryer 3. The records shall include the date of operation, start and stop times for each day of operation, and the total hours of operation each day.

3.17 Visible Emissions Monitoring

The permittee shall conduct a monthly inspection of visible emissions from the seed processing baghouses, dust collectors, and filtration units during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation of visible emissions. If any visible emissions are present from the device stacks, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined 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 accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions 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); any corrective action taken in response to the visible emissions; and the date corrective action was taken.

3.18 Recordkeeping Requirement

The permittee shall comply with the requirements of the Recordkeeping General Provision.

4 General Provisions

General Compliance

4.1 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.]

4.2 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]

4.3 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

4.4 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

4.5 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]

4.6 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

4.7 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.

4.8 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.

4.9 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

4.10 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

4.11 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

4.12 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

4.13 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

4.14 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

4.15 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

4.16 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]