

### Department of Environmental Quality

Kimberly D. Shelley Executive Director

DIVISION OF AIR QUALITY Bryce C. Bird Director

DAQE-IN106440005-23

January 26, 2023

Luke Freeman Pitman Farms 1075 North Avenue Sanger, CA 93657 mike.vance@pitmanfarms.com

Dear Mr. Freeman:

Re: Intent to Approve:

Modification to the Approval Order DAQE-AN106440003-21 to add a new equipment

Project Number: N106440005

The attached document is the Intent to Approve (ITA) for the above-referenced project. The ITA is subject to public review. Any comments received shall be considered before an Approval Order (AO) is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Future correspondence on this ITA should include the engineer's name, **Sarah Foran**, as well as the DAQE number as shown on the upper right-hand corner of this letter. Sarah Foran, can be reached at (385) 306-6724 or sforan@utah.gov, if you have any questions.

Sincerely,

Jon Black (Jan 25, 2023 08:57 MST)

Jon L. Black, Manager New Source Review Section

JLB:SF:jg

cc: Central Utah Health Department

## STATE OF UTAH Department of Environmental Quality Division of Air Quality

# INTENT TO APPROVE DAQE-IN106440005-23 Modification to the Approval Order DAQE-AN106440003-21 to add a new equipment

Prepared By Sarah Foran, Engineer (385) 306-6724 sforan@utah.gov

Issued to
Pitman Farms - Moroni Feed Mill

Issued On January 26, 2023

Jon Black (Jan 25, 2023 08:57 MST)

New Source Review Section Manager Jon L. Black

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#### GENERAL INFORMATION

#### **CONTACT/LOCATION INFORMATION**

Owner Name Source Name

Pitman Farms - Moroni Feed Mill

Mailing Address Physical Address

1075 North Avenue 15 East 1900 South Feed Mill Road

Sanger, CA 93657 Moroni, UT 84646

Source Contact UTM Coordinates

 Name Mike Vance
 449,940 m Easting

 Phone (435) 436-8211
 4,372,543 m Northing

Email mike.vance@pitmanfarms.com Datum NAD83 UTM Zone 12

SIC code 2048 (Prepared Feed & Feed Ingredients for Animals & Fowls, Except Dogs & Cats)

#### **SOURCE INFORMATION**

#### General Description

Pitman Farms (Pitman) operates the Moroni Feed Mill. The feed mill operates to support local turkey farms. The Moroni Feed Mill takes in raw materials from truck deliveries such as corn, soybeans, grains, oils, poultry and meat meal, and feed supplements. These materials are offloaded via belly dump trucks into underground storage hoppers or at a bulk material storage shed. The material is then conveyed via belts and augers to an appropriate silo storage bin or sent to processing equipment. Processing includes grinding dry grain and mixing with oils and feed supplements to produce the desired product feed. Ground and mixed materials are also processed into pellets using steam from a natural gas-fired boiler. Finished products are stored in bins before being loaded into trucks for hauling to various animal and poultry feed operations.

#### **NSR** Classification

Minor Modification at Minor Source

#### Source Classification

Located in Attainment Area Sanpete County Airs Source Size: B

#### Applicable Federal Standards

MACT (Part 63), A: General Provisions

MACT (Part 63), ZZZZ: National Emissions Standards for Hazardous Air Pollutants for

Stationary Reciprocating Internal Combustion Engines

#### **Project Description**

Pitman has requested a modification to AO DAQE-AN106440003-21 to add a new natural gas fired boiler. The new 8.4 MMBtu/hr boiler will operate 8,760 hours per year. This change will result in an increase in on-site PTE.

#### **SUMMARY OF EMISSIONS**

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

Criteria Pollutant	Change (TPY)	Total (TPY)
CO <sub>2</sub> Equivalent	4354.21	8717.00
Carbon Monoxide	3.03	6.14
Nitrogen Oxides	1.34	5.33
Particulate Matter - PM <sub>10</sub>	0.27	9.78
Particulate Matter - PM <sub>2.5</sub>	0.27	0.89
Sulfur Dioxide	0.02	0.10
Volatile Organic Compounds	0.20	0.43

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Formaldehyde (CAS #50000)	194	200
Generic HAPs (CAS #GHAPS)	0	4
Hexane (CAS #110543)	130	260
	Change (TPY)	Total (TPY)
Total HAPs	0.16	0.23

#### PUBLIC NOTICE STATEMENT

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Director.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the intent to approve will be published in the Sanpete Messenger on February 1, 2023. During the public comment period the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing within 15 days of publication, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

#### **SECTION I: GENERAL PROVISIONS**

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

I.1	All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
I.2	The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
I.3	Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
I.4	All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]
I.5	At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
I.6	The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]
I.7	The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]
I.8	The owner/operator shall submit documentation of the status of construction or modification to the Director within 18 months from the date of this AO. This AO may become invalid if construction is not commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the documentation to the Director, attn.: NSR Section. [R307-401-18]

#### **SECTION II: PERMITTED EQUIPMENT**

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

#### II.A THE APPROVED EQUIPMENT

II.A.1	Moroni Feed Mill

II.A.2	One Boiler (NEW) Fuel: Natural Gas Rating: 8.4 MMBtu/hr Control: Low- NO <sub>x</sub> (<30 ppm)
II.A.3	One Boiler Fuel: Natural Gas Rating: 8.4 MMBtu/hr
II.A.4	One Emergency Generator Capacity: 245 hp Fuel: Diesel MACT Applicability: Subpart ZZZZ
II.A.5	One Roller Mill
II.A.6	One Pelletizer Controlled by Cyclone
II.A.7	Various Storage Silos All Controlled by Bin Vents located at the top of silos

#### **SECTION II: SPECIAL PROVISIONS**

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

#### II.B REQUIREMENTS AND LIMITATIONS

II.B.1	Site Wide Requirements
II.B.1.a	Visible emissions from the following emission points shall not exceed the following values:
	A. Natural gas boilers - 10% opacity
	B. Diesel Generator - 20% opacity
	C. All silo emission points - 10% opacity
	D. All drop points - 20% opacity
	E. Cyclone - 10% opacity.
	[R307-401-8]
II.B.1.a.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-201-3]

II.B.1.b	The following operation and production limits shall not be exceeded:
	A. 250,000 tons of received grains per rolling 12-month period
	B. 150,000 tons of shipped grains per rolling 12-month period
	C. 150,000 tons of grains processed through the roller mill per rolling 12-month period
	D. 20,800 tons of grains processed through the pelletizer per rolling 12-month period.
	[R307-401-8]
II.B.1.b.1	To determine compliance with a rolling 12-month total the owner/operator shall calculate a new 12-month total by the last day of each month using data from the previous 12 months. Records of production shall be kept for all periods when the plant is in operation. Production shall be determined by scale house records, vendor receipts, or operational logs. The records of production shall be kept on a daily basis. [R307-401-8]
II.B.2	Boiler Requirements
II.B.2.a	The owner/operator shall only utilize natural gas as fuel in the boiler. [R307-401-8]
II.B.3	Emergency Generator Requirements
II.B.3.a	The owner/operator shall not operate the emergency generator engine on site for more than 100 hours per rolling 12-month period during non-emergency situations. There is no time limit on the use of the engine during emergencies. [40 CFR 63 Subpart ZZZZ, R307-401-8]
II.B.3.a.1	To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the last day of each month using data from the previous 12 months. Records documenting the operation of the emergency engine shall be kept in a log and shall include the following:
	1. The date the emergency engine was used
	2. The duration of operation in hours
	3. The reason for the emergency engine usage.
	[40 CFR 63 Subpart ZZZZ, R307-401-8]
II.B.3.a.2	To determine the duration of operation, the owner/operator shall install a non-resettable hour meter for the emergency engine. [40 CFR 63 Subpart ZZZZ, R307-401-8]
II.B.3.b	The owner/operator shall only use diesel fuel (fuel oil #1, #2, or diesel fuel oil additives) as a fuel source for the emergency engine on site. All diesel burned shall meet the definition of ultra-low sulfur diesel (ULSD), and contain no more than 15 ppm sulfur. [R307-401-8]
II.B.3.b.1	To demonstrate compliance with the diesel fuel requirements the owner/operator shall keep and maintain fuel purchase invoices. The fuel purchase invoices shall indicate that the diesel fuel meets the ULSD requirements, or the owner/operator shall obtain certification of sulfur content from the fuel supplier. [R307-401-8]
II.B.4	Haul Road and Fugitive Dust Requirements
II.B.4.a	Visible Emissions from the haul roads and other operational areas shall not exceed 20% opacity. [R307-401-8]
L	

II.B.4.a.1	Visible emission determinations for fugitive dust emissions from haul-road traffic and mobile equipment in operational areas shall use procedures similar to Method 9. The normal requirement for observations to be made at 15-second intervals over a six-minute period, however, shall not apply. Visible emissions shall be measured at the densest point of the plume but at a point not less than 1/2 vehicle length behind the vehicle and not less than 1/2 the height of the vehicle. [R307-401-8]
II.B.4.b	For paved and unpaved roads, the owner/operator shall spray with water all applicable haul roads and operational areas on site to maintain the opacity limits listed in this AO. If the temperature is below freezing, the owner/operator may stop spraying the haul roads with water. [R307-401-8]
II.B.4.b.1	For haul roads, records of water spraying shall be kept for all periods when the plant is in operation. The records shall include the following items:
	A. Date and time treatments were made
	B. Number of treatments made and quantity of water applied
	C. Rainfall amount received, if any
	D. Records of temperature, if the temperature is below freezing.
	[R307-401-8]

#### **PERMIT HISTORY**

This Approval Order shall supersede (if a modification) or will be based on the following documents:

Supersedes

Is Derived From

AO DAQE-AN106440003-21 dated April 7, 2021 NOI dated July 22, 2022 Additional Information dated August 25, 2022 Additional Information dated October 11, 2022 Incorporates Incorporates

#### **ACRONYMS**

The following lists commonly used acronyms and associated translations as they apply to this document:

40 CFR Title 40 of the Code of Federal Regulations

AO Approval Order

BACT Best Available Control Technology

CAA Clean Air Act

CAAA Clean Air Act Amendments

CDS Classification Data System (used by Environmental Protection Agency to classify

sources by size/type)

CEM Continuous emissions monitor

CEMS Continuous emissions monitoring system

CFR Code of Federal Regulations
CMS Continuous monitoring system

CO Carbon monoxide CO<sub>2</sub> Carbon Dioxide

CO<sub>2</sub>e Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98,

Subpart A, Table A-1

COM Continuous opacity monitor DAQ/UDAQ Division of Air Quality

DAQE This is a document tracking code for internal Division of Air Quality use

EPA Environmental Protection Agency

FDCP Fugitive dust control plan

GHG Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i)
GWP Global Warming Potential - Title 40 of the Code of Federal Regulations Part 86.1818-

12(a)

HAP or HAPs Hazardous air pollutant(s)

ITA Intent to Approve LB/YR Pounds per year

MACT Maximum Achievable Control Technology

MMBTU Million British Thermal Units

NAA Nonattainment Area

NAAOS National Ambient Air Quality Standards

NESHAP National Emission Standards for Hazardous Air Pollutants

NOI Notice of Intent NO<sub>x</sub> Oxides of nitrogen

NSPS New Source Performance Standard

NSR New Source Review

 $PM_{10}$  Particulate matter less than 10 microns in size  $PM_{2.5}$  Particulate matter less than 2.5 microns in size

PSD Prevention of Significant Deterioration

PTE Potential to Emit R307 Rules Series 307

R307-401 Rules Series 307 - Section 401

SO<sub>2</sub> Sulfur dioxide

Title IV Title IV of the Clean Air Act
Title V Title V of the Clean Air Act

TPY Tons per year

UAC Utah Administrative Code VOC Volatile organic compounds