Siffring, Stuart

From: Siffring, Stuart
Sent: Wednesday, November 29, 2017 11:42 AM
To: 'acallendrello@baycorpholdings.com'; Beeler, Cindy; Belille, Jean; 'bret@bison-eng.com'; Darling, Corbin; 'Don Shepherd'; 'Jacus, John'; 'Jim Semerad'; 'jmalone@aquionix.com'; 'John Barth'; 'Julie Merkel'; 'Kyle Schnabel'; 'Lionel Trepanier'
Subject: Notice of Issuance of Permit to Construct on the Fort Peck Indian Reservation

This is to notify you that the EPA has issued a final Clean Air Act (CAA) minor permit to construct for the existing CHS, Inc. Farmers Elevator - Macon pursuant to the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR Part 49. The final MNSR permit, response to comments and administrative permit record will be available in PDF format on our website at: http://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8.

In accordance with the regulations at §49.159(a), the permit will be effective 30 days after the date of this notice, on December 28, 2017. Within 30 days after a final permit decision has been issued, any person who filed comments on the proposed permit or participated in the public hearing may petition the Environmental Appeals Board (EAB) to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when we have fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is under Section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we issue or deny a final permit and agency review procedures are exhausted.

Thank you,

Stuart Siffring, P.E.
Tribal Assistance Program
US EPA Region 8
Phone: (303) 312-6478
Fax: (303) 312-6064

Siffring, Stuart

From: Siffring, Stuart
Sent: Wednesday, November 29, 2017 1:30 PM
To: 'Mutschler, Pete'
Subject: Final MNSR Permit for Farmers Elevator - Macon
Attachments: CHS Farmers Elevator - Macon Final Permit.pdf; CHS_letter_11_28_2017.pdf

Attached is an updated cover letter that corrects the permit effective date to December 28th, 2017. I apologize for the error. Thanks!

Mr. Mutschler,

I have attached the final requested permit and the accompanying response to comments document for the Farmers Elevator - Macon, issued pursuant to the Tribal Minor New Source Review (MNSR) Program at 40 CFR Part 49. We will also be posting the final MNSR permit and response to comments in PDF format on our website shortly at: http://www2.epa.gov/caa-permitting/caa-permits-issued-epa-region-8.

In accordance with the regulations at §49.159(a), the permit will be effective 30 days after the date of this notice, on December 28, 2017. Within 30 days after a final permit decision has been issued, any person who filed comments on the proposed permit or participated in the public hearing may petition the Environmental Appeals Board (EAB) to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when we have fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is under Section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we issue or deny a final permit and agency review procedures are exhausted.

If you have any questions or concerns regarding this final permit action, or would like a paper copy, please contact me.

Thanks,

Stuart Siffring, P.E.
Tribal Air Permitting
US EPA Region 8 Air Program
Phone: (303) 312-6478
Fax: (303) 312-6064
https://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region

```
** STACK DATA          Rate    Height     Temp.  Velocity     Diam.     Flow
**              0.4200E+00   20.0000    0.0000   30.0450   12.0000    50000.

** BUILDING DATA   BPIP    Height  Max dim.  Min dim.   Orient.   Direct.    Offset
**                   N      0.0000    0.0000    0.0000    0.0000    0.0000    0.0000

** MAKEMET DATA    MinT    MaxT Speed   AnemHt Surf Clim  Albedo   Bowen  Length  SC
FILE
**               249.82  310.93   2.0   10.000    5    3   0.2000   1.5000   0.2000
"NA"

** ADJUST U*      N

** TERRAIN DATA   Terrain    UTM East   UTM North  Zone  Nada     Probe     PROFBASE
 Use AERMAP elev
**                   N            0.0         0.0     0     0       5000.0
609.60         N

** DISCRETE RECEPTORS  Discflag   Receptor file
**                       N        "NA"

** UNITS/POPULATION   Units   R/U  Population      Amb. dist.   Flagpole    Flagpole
height
**                       M     R            0.          30.480       N         0.00

** FUMIGATION        Inversion Break-up  Shoreline  Distance    Direct  Run
AERSCREEN
**                          Y                  N         0.00      0.0     Y

** DEBUG OPTION      Debug
**                      Y

** OUTPUT FILE "AERSCREEN.OUT"

** Temporal sector: Summer, spatial sector:  1

CO STARTING
   TITLEONE CHS
**            REFINE STAGE 3
   MODELOPT CONC SCREEN  FLAT
   AVERTIME 1
   POLLUTID OTHER
   RUNORNOT RUN
CO FINISHED

SO STARTING
   LOCATION SOURCE POINT        0.0     0.0
   SRCPARAM SOURCE   0.4200E+00   20.000    0.000   30.045   12.000
```

```
   SRCGROUP  ALL

SO FINISHED

RE STARTING
** Fence line receptor
   DISCCART         30.48         0.00
** Refined receptors
   DISCCART        125.00         0.00
   DISCCART        126.00         0.00
   DISCCART        127.00         0.00
   DISCCART        128.00         0.00
   DISCCART        129.00         0.00
   DISCCART        130.00         0.00
   DISCCART        131.00         0.00
   DISCCART        132.00         0.00
   DISCCART        133.00         0.00
   DISCCART        134.00         0.00
   DISCCART        135.00         0.00
   DISCCART        136.00         0.00
   DISCCART        137.00         0.00
   DISCCART        138.00         0.00
   DISCCART        139.00         0.00
   DISCCART        140.00         0.00
   DISCCART        141.00         0.00
   DISCCART        142.00         0.00
   DISCCART        143.00         0.00
   DISCCART        144.00         0.00
   DISCCART        145.00         0.00
   DISCCART        146.00         0.00
   DISCCART        147.00         0.00
   DISCCART        148.00         0.00
   DISCCART        149.00         0.00
   DISCCART        150.00         0.00
   DISCCART        151.00         0.00
   DISCCART        152.00         0.00
   DISCCART        153.00         0.00
   DISCCART        154.00         0.00
   DISCCART        155.00         0.00
   DISCCART        156.00         0.00
   DISCCART        157.00         0.00
   DISCCART        158.00         0.00
   DISCCART        159.00         0.00
   DISCCART        160.00         0.00
   DISCCART        161.00         0.00
   DISCCART        162.00         0.00
   DISCCART        163.00         0.00
```

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DISCCART        164.00         0.00
DISCCART        165.00         0.00
DISCCART        166.00         0.00
DISCCART        167.00         0.00
DISCCART        168.00         0.00
DISCCART        169.00         0.00
DISCCART        170.00         0.00
DISCCART        171.00         0.00
DISCCART        172.00         0.00
DISCCART        173.00         0.00
DISCCART        174.00         0.00
DISCCART        175.00         0.00
DISCCART        176.00         0.00
DISCCART        177.00         0.00
DISCCART        178.00         0.00
DISCCART        179.00         0.00
DISCCART        180.00         0.00
DISCCART        181.00         0.00
DISCCART        182.00         0.00
DISCCART        183.00         0.00
DISCCART        184.00         0.00
DISCCART        185.00         0.00
DISCCART        186.00         0.00
DISCCART        187.00         0.00
DISCCART        188.00         0.00
DISCCART        189.00         0.00
DISCCART        190.00         0.00
DISCCART        191.00         0.00
DISCCART        192.00         0.00
DISCCART        193.00         0.00
DISCCART        194.00         0.00
DISCCART        195.00         0.00
DISCCART        196.00         0.00
DISCCART        197.00         0.00
DISCCART        198.00         0.00
DISCCART        199.00         0.00
DISCCART        200.00         0.00
DISCCART        201.00         0.00
DISCCART        202.00         0.00
DISCCART        203.00         0.00
DISCCART        204.00         0.00
DISCCART        205.00         0.00
DISCCART        206.00         0.00
DISCCART        207.00         0.00
DISCCART        208.00         0.00
DISCCART        209.00         0.00
DISCCART        210.00         0.00
DISCCART        211.00         0.00
```

```
                                    CHS aermod.out
   DISCCART        212.00         0.00
   DISCCART        213.00         0.00
   DISCCART        214.00         0.00
   DISCCART        215.00         0.00
   DISCCART        216.00         0.00
   DISCCART        217.00         0.00
   DISCCART        218.00         0.00
   DISCCART        219.00         0.00
   DISCCART        220.00         0.00
   DISCCART        221.00         0.00
   DISCCART        222.00         0.00
   DISCCART        223.00         0.00
   DISCCART        224.00         0.00
   DISCCART        225.00         0.00

RE FINISHED

ME STARTING
   SURFFILE  aerscreen_03_01.sfc  FREE
   PROFFILE  aerscreen_03_01.pfl  FREE
   SURFDATA  11111   2010  SCREEN
   UAIRDATA  22222   2010  SCREEN
   PROFBASE  609.6 METERS
ME FINISHED

OU STARTING
   RECTABLE 1  FIRST
   MAXTABLE  ALLAVE  50

   FILEFORM  EXP
   RANKFILE  1 10 AERSCREEN.FIL
   PLOTFILE  1 ALL  FIRST  AERSCREEN.PLT
OU FINISHED

 **********************************
 *** SETUP Finishes Successfully ***
 **********************************

 *** AERMOD - VERSION 16216r ***   *** CHS
                          ***        09/26/17
 *** AERMET - VERSION SCREEN ***   ***
                       ***        09:15:51

                                   PAGE   1
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NOCHKD  SCREEN  RURAL

                                          ***     MODEL SETUP OPTIONS SUMMARY
 ***
```

- -

```
**Model Is Setup For Calculation of Average CONCentration Values.

  --  DEPOSITION LOGIC  --
**NO GAS DEPOSITION Data Provided.
**NO PARTICLE DEPOSITION Data Provided.
**Model Uses NO DRY DEPLETION.  DRYDPLT  =  F
**Model Uses NO WET DEPLETION.  WETDPLT  =  F

**Model Uses RURAL Dispersion Only.

**Model Allows User-Specified Options:
        1. Stack-tip Downwash.
        2. Model Assumes Receptors on FLAT Terrain.
        3. Use Calms Processing Routine.
        4. Use Missing Data Processing Routine.
        5. No Exponential Decay.

**Other Options Specified:
        NOCHKD   - Suppresses checking of date sequence in meteorology files
        SCREEN   - Use screening option
which forces calculation of centerline values

**Model Assumes No FLAGPOLE Receptor Heights.

**The User Specified a Pollutant Type of:  OTHER

**Model Calculates  1 Short Term Average(s) of:   1-HR

**This Run Includes:      1 Source(s);       1 Source Group(s); and     102
Receptor(s)

                with:      1 POINT(s), including
                           0 POINTCAP(s) and      0 POINTHOR(s)
                 and:      0 VOLUME source(s)
                 and:      0 AREA type source(s)
                 and:      0 LINE source(s)
                 and:      0 OPENPIT source(s)
                 and:      0 BUOYANT LINE source(s) with      0 line(s)


**Model Set To Continue RUNning After the Setup Testing.

**The AERMET Input Meteorological Data Version Date: SCREEN

**Output Options Selected:
```

Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE Keyword)
Model Outputs Tables of Overall Maximum Short Term Values (MAXTABLE Keyword)
Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)
Model Outputs External File(s) of Ranked Values (RANKFILE Keyword)

NOTE: Option for EXPonential format used in formatted output result files (FILEFORM Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
m for Missing Hours
b for Both Calm and Missing Hours

**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 609.60 ; Decay Coef. = 0.000 ; Rot. Angle = 0.0
Emission Units = GRAMS/SEC ;
Emission Rate Unit Factor = 0.10000E+07
Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.5 MB of RAM.

*** AERMOD - VERSION 16216r *** *** CHS
*** 09/26/17
*** AERMET - VERSION SCREEN *** ***
*** 09:15:51

*** MODELOPTs: NonDFAULT CONC FLAT NOCHKD SCREEN RURAL

*** POINT SOURCE DATA ***

SOURCE ID	NUMBER EMISSION RATE PART. CATS.	EMISSION RATE (GRAMS/SEC)	BASE X (METERS)	BASE Y (METERS)	BASE ELEV. (METERS)	STACK HEIGHT (METERS)	STACK TEMP. (DEG.K)	STACK EXIT VEL. (M/SEC)	STACK DIAMETER (METERS)	BLDG EXISTS	URBAN SOURCE	CAP/ HOR VARY BY	EMIS RATE SCALAR
SOURCE	0	0.42000E+00	0.0	0.0	609.6	20.00	-0.00	30.04	12.00	NO	NO	NO	

*** AERMOD - VERSION 16216r *** *** CHS
*** 09/16/17

*** AERMET - VERSION SCREEN *** ***
*** 09:15:51

*** MODELOPTs: NonDFAULT CONC FLAT NOCHKD SCREEN RURAL

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs
ALL	SOURCE ,

*** AERMOD - VERSION 16216r *** *** CHS
*** 09/26/17
*** AERMET - VERSION SCREEN *** ***
*** 09:15:51

*** MODELOPTs: NonDFAULT CONC FLAT NOCHKD SCREEN RURAL

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(30.5, 0.0, 609.6, 609.6, 0.0); (125.0, 0.0, 609.6, 609.6, 0.0);
(126.0, 0.0, 609.6, 609.6, 0.0); (127.0, 0.0, 609.6, 609.6, 0.0);
(128.0, 0.0, 609.6, 609.6, 0.0); (129.0, 0.0, 609.6, 609.6, 0.0);
(130.0, 0.0, 609.6, 609.6, 0.0); (131.0, 0.0, 609.6, 609.6, 0.0);
(132.0, 0.0, 609.6, 609.6, 0.0); (133.0, 0.0, 609.6, 609.6, 0.0);
(134.0, 0.0, 609.6, 609.6, 0.0); (135.0, 0.0, 609.6, 609.6, 0.0);
(136.0, 0.0, 609.6, 609.6, 0.0); (137.0, 0.0, 609.6, 609.6, 0.0);
(138.0, 0.0, 609.6, 609.6, 0.0); (139.0, 0.0, 609.6, 609.6, 0.0);
(140.0, 0.0, 609.6, 609.6, 0.0); (141.0, 0.0, 609.6, 609.6, 0.0);
(142.0, 0.0, 609.6, 609.6, 0.0); (143.0, 0.0, 609.6, 609.6, 0.0);
(144.0, 0.0, 609.6, 609.6, 0.0); (145.0, 0.0, 609.6, 609.6, 0.0);

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  (    146.0,       0.0,     609.6,     609.6,       0.0);         (    147.0,
0.0,     609.6,     609.6,       0.0);
  (    148.0,       0.0,     609.6,     609.6,       0.0);         (    149.0,
0.0,     609.6,     609.6,       0.0);
  (    150.0,       0.0,     609.6,     609.6,       0.0);         (    151.0,
0.0,     609.6,     609.6,       0.0);
  (    152.0,       0.0,     609.6,     609.6,       0.0);         (    153.0,
0.0,     609.6,     609.6,       0.0);
  (    154.0,       0.0,     609.6,     609.6,       0.0);         (    155.0,
0.0,     609.6,     609.6,       0.0);
  (    156.0,       0.0,     609.6,     609.6,       0.0);         (    157.0,
0.0,     609.6,     609.6,       0.0);
  (    158.0,       0.0,     609.6,     609.6,       0.0);         (    159.0,
0.0,     609.6,     609.6,       0.0);
  (    160.0,       0.0,     609.6,     609.6,       0.0);         (    161.0,
0.0,     609.6,     609.6,       0.0);
  (    162.0,       0.0,     609.6,     609.6,       0.0);         (    163.0,
0.0,     609.6,     609.6,       0.0);
  (    164.0,       0.0,     609.6,     609.6,       0.0);         (    165.0,
0.0,     609.6,     609.6,       0.0);
  (    166.0,       0.0,     609.6,     609.6,       0.0);         (    167.0,
0.0,     609.6,     609.6,       0.0);
  (    168.0,       0.0,     609.6,     609.6,       0.0);         (    169.0,
0.0,     609.6,     609.6,       0.0);
  (    170.0,       0.0,     609.6,     609.6,       0.0);         (    171.0,
0.0,     609.6,     609.6,       0.0);
  (    172.0,       0.0,     609.6,     609.6,       0.0);         (    173.0,
0.0,     609.6,     609.6,       0.0);
  (    174.0,       0.0,     609.6,     609.6,       0.0);         (    175.0,
0.0,     609.6,     609.6,       0.0);
  (    176.0,       0.0,     609.6,     609.6,       0.0);         (    177.0,
0.0,     609.6,     609.6,       0.0);
  (    178.0,       0.0,     609.6,     609.6,       0.0);         (    179.0,
0.0,     609.6,     609.6,       0.0);
  (    180.0,       0.0,     609.6,     609.6,       0.0);         (    181.0,
0.0,     609.6,     609.6,       0.0);
  (    182.0,       0.0,     609.6,     609.6,       0.0);         (    183.0,
0.0,     609.6,     609.6,       0.0);
  (    184.0,       0.0,     609.6,     609.6,       0.0);         (    185.0,
0.0,     609.6,     609.6,       0.0);
  (    186.0,       0.0,     609.6,     609.6,       0.0);         (    187.0,
0.0,     609.6,     609.6,       0.0);
  (    188.0,       0.0,     609.6,     609.6,       0.0);         (    189.0,
0.0,     609.6,     609.6,       0.0);
  (    190.0,       0.0,     609.6,     609.6,       0.0);         (    191.0,
0.0,     609.6,     609.6,       0.0);
  (    192.0,       0.0,     609.6,     609.6,       0.0);         (    193.0,
0.0,     609.6,     609.6,       0.0);
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     (    194.0,       0.0,     609.6,     609.6,       0.0);         (    195.0,
   0.0,     609.6,     609.6,       0.0);
     (    196.0,       0.0,     609.6,     609.6,       0.0);         (    197.0,
   0.0,     609.6,     609.6,       0.0);
     (    198.0,       0.0,     609.6,     609.6,       0.0);         (    199.0,
   0.0,     609.6,     609.6,       0.0);
     (    200.0,       0.0,     609.6,     609.6,       0.0);         (    201.0,
   0.0,     609.6,     609.6,       0.0);
     (    202.0,       0.0,     609.6,     609.6,       0.0);         (    203.0,
   0.0,     609.6,     609.6,       0.0);
     (    204.0,       0.0,     609.6,     609.6,       0.0);         (    205.0,
   0.0,     609.6,     609.6,       0.0);
     (    206.0,       0.0,     609.6,     609.6,       0.0);         (    207.0,
   0.0,     609.6,     609.6,       0.0);
     (    208.0,       0.0,     609.6,     609.6,       0.0);         (    209.0,
   0.0,     609.6,     609.6,       0.0);
     (    210.0,       0.0,     609.6,     609.6,       0.0);         (    211.0,
   0.0,     609.6,     609.6,       0.0);
     (    212.0,       0.0,     609.6,     609.6,       0.0);         (    213.0,
   0.0,     609.6,     609.6,       0.0);
 *** AERMOD - VERSION 16216r ***   *** CHS
                          ***        09/26/17
 *** AERMET - VERSION SCREEN ***   ***
                          ***        09:15:51

                                     PAGE   5
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NOCHKD  SCREEN  RURAL

                                                *** DISCRETE CARTESIAN RECEPTORS ***
                                               (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                                           (METERS)

     (    214.0,       0.0,     609.6,     609.6,       0.0);         (    215.0,
   0.0,     609.6,     609.6,       0.0);
     (    216.0,       0.0,     609.6,     609.6,       0.0);         (    217.0,
   0.0,     609.6,     609.6,       0.0);
     (    218.0,       0.0,     609.6,     609.6,       0.0);         (    219.0,
   0.0,     609.6,     609.6,       0.0);
     (    220.0,       0.0,     609.6,     609.6,       0.0);         (    221.0,
   0.0,     609.6,     609.6,       0.0);
     (    222.0,       0.0,     609.6,     609.6,       0.0);         (    223.0,
   0.0,     609.6,     609.6,       0.0);
     (    224.0,       0.0,     609.6,     609.6,       0.0);         (    225.0,
   0.0,     609.6,     609.6,       0.0);
 *** AERMOD - VERSION 16216r ***   *** CHS
                          ***        09/16/17
 *** AERMET - VERSION SCREEN ***   ***
                          ***        09:15:51
```

PAGE 6
*** MODELOPTs: NonDFAULT CONC FLAT NOCHKD SCREEN RURAL

*** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***
(1=YES; 0=NO)

```
           1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1
1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
           1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1
1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
           1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1
1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
           1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1
1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
           1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1
1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
           1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1
1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
           1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1
1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1
           1 1 1 1 1 1 1 1 1 1  1 1 1 1 1
```

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

*** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES ***
(METERS/SEC)

1.54, 3.09, 5.14, 8.23, 10.80,

↑ *** AERMOD - VERSION 16216r *** *** CHS *** 09/26/17
*** AERMET - VERSION SCREEN *** *** *** 09:15:51

PAGE 7
*** MODELOPTs: NonDFAULT CONC FLAT NOCHKD SCREEN RURAL

*** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

Surface file: aerscreen_03_01.sfc
Met Version: SCREEN

Profile file: aerscreen_03_01.pfl

Surface format: FREE

Profile format: FREE

Surface station no.: 11111 Upper air station no.: 22222
Name: SCREEN Name: SCREEN

Year: 2010 Year: 2010

First 24 hours of scalar data

YR	MO	DY	JDY	HR	H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS	WD	HT	REF TA	HT
10	01	01	1	01	-8.4	0.102	-9.000	0.020	-999.	75.	9.7	0.20	1.50	0.20	2.00	270.	10.0	249.8	2.0
10	01	02	2	01	-8.4	0.102	-9.000	0.020	-999.	376.	9.7	0.20	1.50	0.20	2.00	270.	10.0	249.8	2.0
10	01	03	3	01	-7.7	0.102	-9.000	0.020	-999.	75.	10.6	0.20	1.50	0.20	2.00	270.	10.0	249.8	2.0
10	01	04	4	01	-7.7	0.102	-9.000	0.020	-999.	376.	10.6	0.20	1.50	0.20	2.00	270.	10.0	249.8	2.0
10	01	05	5	01	-2.1	0.196	-9.000	0.020	-999.	199.	278.9	0.20	1.50	0.20	2.00	270.	10.0	249.8	2.0
10	01	06	6	01	-9.4	0.102	-9.000	0.020	-999.	75.	10.9	0.20	1.50	0.20	2.00	270.	10.0	310.9	2.0
10	01	07	7	01	-9.4	0.102	-9.000	0.020	-999.	376.	10.9	0.20	1.50	0.20	2.00	270.	10.0	310.9	2.0
10	01	08	8	01	-8.6	0.102	-9.000	0.020	-999.	75.	11.9	0.20	1.50	0.20	2.00	270.	10.0	310.9	2.0
10	01	09	9	01	-8.6	0.102	-9.000	0.020	-999.	376.	11.9	0.20	1.50	0.20	2.00	270.	10.0	310.9	2.0
10	01	10	10	01	-2.1	0.197	-9.000	0.020	-999.	202.	353.6	0.20	1.50	0.20	2.00	270.	10.0	310.9	2.0
10	01	11	11	01	-7.6	0.140	-9.000	0.020	-999.	120.	27.7	0.20	1.50	0.20	2.00	270.	10.0	249.8	2.0
10	01	12	12	01	-7.1	0.156	-9.000	0.020	-999.	141.	40.9	0.20	1.50	0.20	2.00	270.	10.0	249.8	2.0
10	01	13	13	01	-1.1	0.200	-9.000	0.020	-999.	206.	581.2	0.20	1.50	0.20	2.00	270.	10.0	249.8	2.0
10	01	14	14	01	-8.6	0.159	-9.000	0.020	-999.	146.	44.4	0.20	1.50	0.20	2.00	270.	10.0	310.9	2.0
10	01	15	15	01	-8.6	0.159	-9.000	0.020	-999.	146.	44.4	0.20	1.50	0.20	2.00	270.	10.0	310.9	2.0
10	01	16	16	01	-8.6	0.159	-9.000	0.020	-999.	146.	44.4	0.20	1.50	0.20	2.00	270.	10.0	310.9	2.0

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 10 01 17  17 01  -13.2  0.128 -9.000  0.020 -999.  105.     12.2  0.20   1.50
0.20    2.50  270.   10.0  249.8    2.0
 10 01 18  18 01  -14.8  0.163 -9.000  0.020 -999.  151.     22.5  0.20   1.50
0.20    2.50  270.   10.0  249.8    2.0
 10 01 19  19 01   -2.6  0.249 -9.000  0.020 -999.  285.    450.7  0.20   1.50
0.20    2.50  270.   10.0  249.8    2.0
 10 01 20  20 01  -18.5  0.171 -9.000  0.020 -999.  163.     26.0  0.20   1.50
0.20    2.50  270.   10.0  310.9    2.0
 10 01 21  21 01  -17.5  0.193 -9.000  0.020 -999.  195.     39.1  0.20   1.50
0.20    2.50  270.   10.0  310.9    2.0
 10 01 22  22 01   -2.6  0.250 -9.000  0.020 -999.  287.    567.4  0.20   1.50
0.20    2.50  270.   10.0  310.9    2.0
 10 01 23  23 01  -11.6  0.213 -9.000  0.020 -999.  227.     64.4  0.20   1.50
0.20    2.50  270.   10.0  249.8    2.0
 10 01 24  24 01  -10.1  0.221 -9.000  0.020 -999.  240.     82.6  0.20   1.50
0.20    2.50  270.   10.0  249.8    2.0


 First hour of profile data
 YR MO DY HR HEIGHT F  WDIR    WSPD AMB_TMP sigmaA  sigmaW  sigmaV
 10 01 01 01   10.0 1  270.    2.00   249.9   99.0  -99.00  -99.00

 F indicates top of profile (=1) or below (=0)
 *** AERMOD - VERSION 16216r ***   *** CHS
                          ***        09/26/17
 *** AERMET - VERSION SCREEN ***   ***
                       ***        09:15:51

                                  PAGE   8
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NOCHKD  SCREEN  RURAL

                               *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     SOURCE      ,

                                                *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                             ** CONC OF OTHER    IN MICROGRAMS/M**3
                  **

      X-COORD (M)  Y-COORD (M)        CONC     (YYMMDDHH)              X-COORD (M)
Y-COORD (M)        CONC     (YYMMDDHH)
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
            30.48         0.00        0.01363  (10011412)                   125.00
      0.00       29.60377  (10011301)
           126.00         0.00       30.41251  (10011301)                   127.00
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0.00       31.21662  (10011301)
     128.00         0.00       32.01524  (10011301)                  129.00
0.00       32.80756  (10011301)
     130.00         0.00       33.59278  (10011301)                  131.00
0.00       34.37013  (10011301)
     132.00         0.00       35.13888  (10011301)                  133.00
0.00       35.89832  (10011301)
     134.00         0.00       36.64902  (10011301)                  135.00
0.00       37.39973  (10011301)
     136.00         0.00       38.15135  (10011301)                  137.00
0.00       38.90274  (10011301)
     138.00         0.00       39.65276  (10011301)                  139.00
0.00       40.40029  (10011301)
     140.00         0.00       41.14415  (10011301)                  141.00
0.00       41.88321  (10011301)
     142.00         0.00       42.61738  (10011301)                  143.00
0.00       43.35224  (10011301)
     144.00         0.00       44.08735  (10011301)                  145.00
0.00       44.82101  (10011301)
     146.00         0.00       45.33916  (10011301)                  147.00
0.00       45.62276  (10011301)
     148.00         0.00       45.89535  (10011301)                  149.00
0.00       46.15710  (10011301)
     150.00         0.00       46.40818  (10011301)                  151.00
0.00       46.64878  (10011301)
     152.00         0.00       46.87906  (10011301)                  153.00
0.00       47.09921  (10011301)
     154.00         0.00       47.30941  (10011301)                  155.00
0.00       47.50984  (10011301)
     156.00         0.00       47.70069  (10011301)                  157.00
0.00       47.88213  (10011301)
     158.00         0.00       48.05436  (10011301)                  159.00
0.00       48.21756  (10011301)
     160.00         0.00       48.37190  (10011301)                  161.00
0.00       48.51758  (10011301)
     162.00         0.00       48.65477  (10011301)                  163.00
0.00       48.78365  (10011301)
     164.00         0.00       48.90442  (10011301)                  165.00
0.00       49.01723  (10011301)
     166.00         0.00       49.12228  (10011301)                  167.00
0.00       49.21974  (10011301)
     168.00         0.00       49.30977  (10011301)                  169.00
0.00       49.39256  (10011301)
     170.00         0.00       49.46827  (10011301)                  171.00
0.00       49.53708  (10011301)
     172.00         0.00       49.59914  (10011301)                  173.00
0.00       49.65462  (10011301)
     174.00         0.00       49.70368  (10011301)                  175.00
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      0.00       49.74649  (10011301)
           176.00         0.00       49.78320  (10011301)                    177.00
      0.00       49.81396  (10011301)
           178.00         0.00       49.83892  (10011301)                    179.00
      0.00       49.85824  (10011301)
           180.00         0.00       49.87206  (10011301)                    181.00
      0.00       49.88053  (10011301)
           182.00         0.00       49.88379  (10011301)                    183.00
      0.00       49.88198  (10011301)
           184.00         0.00       49.87523  (10011301)                    185.00
      0.00       49.86369  (10011301)
           186.00         0.00       49.84748  (10011301)                    187.00
      0.00       49.82673  (10011301)
           188.00         0.00       49.80157  (10011301)                    189.00
      0.00       49.77213  (10011301)
           190.00         0.00       49.73852  (10011301)                    191.00
      0.00       49.70087  (10011301)
           192.00         0.00       49.65929  (10011301)                    193.00
      0.00       49.61390  (10011301)
           194.00         0.00       49.56480  (10011301)                    195.00
      0.00       49.51213  (10011301)
           196.00         0.00       49.45596  (10011301)                    197.00
      0.00       49.39643  (10011301)
           198.00         0.00       49.33361  (10011301)                    199.00
      0.00       49.26763  (10011301)
           200.00         0.00       49.19857  (10011301)                    201.00
      0.00       49.12653  (10011301)
           202.00         0.00       49.05161  (10011301)                    203.00
      0.00       48.97390  (10011301)
♠ *** AERMOD - VERSION 16216r ***   *** CHS
                          ***        09/26/17
 *** AERMET - VERSION SCREEN ***   ***
                       ***        09:15:51

                                  PAGE   9
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NOCHKD  SCREEN  RURAL

                                *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     SOURCE      ,

                                              *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                           ** CONC OF OTHER    IN MICROGRAMS/M**3
                  **

      X-COORD (M)  Y-COORD (M)        CONC     (YYMMDDHH)              X-COORD (M)
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Y-COORD (M)        CONC     (YYMMDDHH)
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - -
           204.00         0.00       48.89349  (10011301)                 205.00
      0.00       48.81046  (10011301)
           206.00         0.00       48.72490  (10011301)                 207.00
      0.00       48.63690  (10011301)
           208.00         0.00       48.54654  (10011301)                 209.00
      0.00       48.45390  (10011301)
           210.00         0.00       48.35905  (10011301)                 211.00
      0.00       48.26207  (10011301)
           212.00         0.00       48.16303  (10011301)                 213.00
      0.00       48.06202  (10011301)
           214.00         0.00       47.95909  (10011301)                 215.00
      0.00       47.85432  (10011301)
           216.00         0.00       47.74778  (10011301)                 217.00
      0.00       47.63953  (10011301)
           218.00         0.00       47.52963  (10011301)                 219.00
      0.00       47.41815  (10011301)
           220.00         0.00       47.30514  (10011301)                 221.00
      0.00       47.19068  (10011301)
           222.00         0.00       47.07480  (10011301)                 223.00
      0.00       46.95758  (10011301)
           224.00         0.00       46.83907  (10011301)                 225.00
      0.00       46.71931  (10011301)
↑ *** AERMOD - VERSION 16216r ***   *** CHS
                         ***        09/26/17
 *** AERMET - VERSION SCREEN ***   ***
                       ***        09:15:51

                                  PAGE  10
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  NOCHKD  SCREEN  RURAL

                              *** THE MAXIMUM   50   1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     SOURCE      ,

                                        ** CONC OF OTHER    IN MICROGRAMS/M**3
                   **

 RANK        CONC    (YYMMDDHH) AT      RECEPTOR (XR,YR) OF TYPE    RANK        CONC
   (YYMMDDHH) AT      RECEPTOR (XR,YR) OF TYPE
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - -
    1.      49.88379 (10011301) AT (    182.00,       0.00)  DC       26.
49.46827 (10011301) AT (    170.00,       0.00)  DC
    2.      49.88198 (10011301) AT (    183.00,       0.00)  DC       27.
49.45596 (10011301) AT (    196.00,       0.00)  DC
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    3.      49.88053 (10011301) AT (    181.00,       0.00)  DC       28.
49.39643 (10011301) AT (    197.00,       0.00)  DC
    4.      49.87523 (10011301) AT (    184.00,       0.00)  DC       29.
49.39256 (10011301) AT (    169.00,       0.00)  DC
    5.      49.87206 (10011301) AT (    180.00,       0.00)  DC       30.
49.33361 (10011301) AT (    198.00,       0.00)  DC
    6.      49.86369 (10011301) AT (    185.00,       0.00)  DC       31.
49.30977 (10011301) AT (    168.00,       0.00)  DC
    7.      49.85824 (10011301) AT (    179.00,       0.00)  DC       32.
49.26763 (10011301) AT (    199.00,       0.00)  DC
    8.      49.84748 (10011301) AT (    186.00,       0.00)  DC       33.
49.21974 (10011301) AT (    167.00,       0.00)  DC
    9.      49.83892 (10011301) AT (    178.00,       0.00)  DC       34.
49.19857 (10011301) AT (    200.00,       0.00)  DC
   10.      49.82673 (10011301) AT (    187.00,       0.00)  DC       35.
49.12653 (10011301) AT (    201.00,       0.00)  DC
   11.      49.81396 (10011301) AT (    177.00,       0.00)  DC       36.
49.12228 (10011301) AT (    166.00,       0.00)  DC
   12.      49.80157 (10011301) AT (    188.00,       0.00)  DC       37.
49.05161 (10011301) AT (    202.00,       0.00)  DC
   13.      49.78320 (10011301) AT (    176.00,       0.00)  DC       38.
49.01723 (10011301) AT (    165.00,       0.00)  DC
   14.      49.77213 (10011301) AT (    189.00,       0.00)  DC       39.
48.97390 (10011301) AT (    203.00,       0.00)  DC
   15.      49.74649 (10011301) AT (    175.00,       0.00)  DC       40.
48.90442 (10011301) AT (    164.00,       0.00)  DC
   16.      49.73852 (10011301) AT (    190.00,       0.00)  DC       41.
48.89349 (10011301) AT (    204.00,       0.00)  DC
   17.      49.70368 (10011301) AT (    174.00,       0.00)  DC       42.
48.81046 (10011301) AT (    205.00,       0.00)  DC
   18.      49.70087 (10011301) AT (    191.00,       0.00)  DC       43.
48.78365 (10011301) AT (    163.00,       0.00)  DC
   19.      49.65929 (10011301) AT (    192.00,       0.00)  DC       44.
48.72490 (10011301) AT (    206.00,       0.00)  DC
   20.      49.65462 (10011301) AT (    173.00,       0.00)  DC       45.
48.65477 (10011301) AT (    162.00,       0.00)  DC
   21.      49.61390 (10011301) AT (    193.00,       0.00)  DC       46.
48.63690 (10011301) AT (    207.00,       0.00)  DC
   22.      49.59914 (10011301) AT (    172.00,       0.00)  DC       47.
48.54654 (10011301) AT (    208.00,       0.00)  DC
   23.      49.56480 (10011301) AT (    194.00,       0.00)  DC       48.
48.51758 (10011301) AT (    161.00,       0.00)  DC
   24.      49.53708 (10011301) AT (    171.00,       0.00)  DC       49.
48.45390 (10011301) AT (    209.00,       0.00)  DC
   25.      49.51213 (10011301) AT (    195.00,       0.00)  DC       50.
48.37190 (10011301) AT (    160.00,       0.00)  DC

  *** RECEPTOR TYPES:  GC = GRIDCART
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GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
*** AERMOD - VERSION 16216r *** *** CHS
*** 09/26/17
*** AERMET - VERSION SCREEN *** ***
*** 09:15:51

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*** MODELOPTs: NonDFAULT CONC FLAT NOCHKD SCREEN RURAL

*** THE SUMMARY OF HIGHEST 1-HR RESULTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

GROUP ID	AVERAGE CONC	DATE (YYMMDDHH)	NETWORK OF TYPE	GRID-ID	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)
ALL	HIGH 1ST HIGH VALUE IS	49.88379	ON 10011301:		AT (182.00, 0.00, 609.60, 609.60, 0.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
*** AERMOD - VERSION 16216r *** *** CHS
*** 09/26/17
*** AERMET - VERSION SCREEN *** ***
*** 09:15:51

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*** MODELOPTs: NonDFAULT CONC FLAT NOCHKD SCREEN RURAL

*** Message Summary : AERMOD Model Execution ***

--------- Summary of Total Messages --------

A Total of 0 Fatal Error Message(s)
A Total of 0 Warning Message(s)
A Total of 0 Informational Message(s)

A Total of 334 Hours Were Processed

A Total of 0 Calm Hours Identified

A Total of 0 Missing Hours Identified (0.00 Percent)

******** FATAL ERROR MESSAGES ********
*** NONE ***

******** WARNING MESSAGES ********
*** NONE ***

****
*** AERMOD Finishes Successfully ***
****

FORT PECK TRIBES

Assiniboine & Sioux

Tribal NSR Permit Contact
c/o Air Program (8P-AR)
U.S. EPA Region 8
1595 Wynkoop Street
Denver, CO 80202

July 13, 2017

Assiniboine & Sioux Tribes of the
Fort Peck Indian Reservation
P.O. Box 1027
Poplar, MT 59255

Email: R8AirPermitting@epa.gov

Re: Comments on Proposed MNSR Permit No. TMNSR-FP-000010-2015.001
CHS Inc., Farmer's Elevator - Macon

To Whom it May Concern:

The Assiniboine and Sioux Tribes (Tribes) of the Fort Peck Indian Reservation (Reservation) have reviewed and now provide our written comments on U.S. EPA's Proposed Air Quality Permit to Construct #TMNSR-FP-000010.2015.001 (Air Permit) for the CHS Inc., Farmers Elevator located at 6134 Hwy 13 in Macon, MT, within the exterior boundaries of our Reservation. This federal Minor New Source Review (MNSR) permit action allows for the construction of an expansion to the existing country grain elevator facility.

As you are aware, the Tribes, through our Office of Enyironmental Protection (OEP), have been working to develop a tribal Air Quality Program for our Reservation, with the support from U.S. EPA's air quality program support funding. We have previously been granted Treatment as a State (TAS) status and are currently finalizing drafts of the elements of a Tribal Implementation Plan (TIP) (which includes a draft Air Quality Code), and will soon initiate a public outreach, review, comment, and revision effort. U.S. EPA will receive a formal submittal of the TIP with the Tribes' request for approval shortly thereafter.

The draft Air Quality Code includes what will be the Tribes' Minor New Source Review (MNSR) Permit Program, to be implemented by OEP, has been developed to be largely

consistent (and certainly not in conflict with) U.S. EPA's MNSR Permit Program. The fundamental objectives of the Tribes' MNSR Permit Program will be to enable the Tribes to achieve the Purposes stipulated in Section 602 of the draft Code:

- (A) To maintain the quality of the air of the Reservation, so as to protect and enhance human health, welfare, and safety.
- (B) To protect and enhance the aesthetic and environmental quality of the Reservation. This includes protection ambient air quality standard increments associated with the Prevention of Significant Deterioration program and protecting Air Quality Related Values (including visibility conditions). (40 CR 52.21)
- (C) Consistent with the [federal] Clean Air Act, to encourage or otherwise promote reasonable actions for pollution prevention. (42 U.S.C. Sec 7401(b)(4))
- (D) To foster economic development on the Reservation in a manner consistent with the preservation of the Reservation's air quality.

The Air Code and the other elements of the TIP reflect the Tribes' interest in and dedication to protecting air quality on the Reservation and to appropriately regulate sources of air pollution on the Reservation.

The Tribes anticipate U.S EPA's approval of both our TIP and MNSR Permit Program. The Tribes then expect that U.S. EPA will transfer all federal MNSR permits that have been issued for sources on the Reservation to the Tribes for administration. As such, OEP will assume the authority to administer the provisions of those MNSR Permits previously issued by U.S. EPA, including the permit currently under review here. The Tribes' interest, therefore, in providing comment on the CHS Inc. Air Permit is to: 1) encourage and promote reasonable actions for pollution prevention; 2) adequately safeguard air quality and human health; and 3) support U.S. EPA to include adequate and enforceable conditions in the proposed MNSR Permit that will one day be transferred to the Tribes and OEP to administer.

The OEP has reviewed the information made available for public review and comment (dated May 26, 2017), namely the proposed Permit and the corresponding Technical Support Document (TSD). The Permit, as proposed, would approve an expansion of the existing facility, accommodating an increase in grain production from 14.5 million bushels of grain per year (MMBY) to 18 MMBY. Based on the information provided in the public review package, it is not possible to provide a quality assurance/quality control review of EPA's emission calculations for the existing facility or the proposed expansion. OEP has developed a rudimentary emission inventory and the particulate emissions estimates in the TSD are in general agreement with the estimates prepared by the OEP.

The Tribes provide these written comments with supporting arguments on several reasonably ascertainable issues:

1. Emission Limits. U.S. EPA's "Public Notice: Request for Comments" includes the following description of Proposed Permit Requirements: "CHS has requested that emission limits on the elevator legs, truck unloading pit, and grain cleaning area be put in place to reduce emissions of particulate matter (PM, PM_{10}, and $PM_{2.5}$)." The proposed permit does include Maximum Permitted Throughputs for approved emissions units and/or activities. However, the proposed Permit DOES NOT include emission limits (in tons per day or tons per year) for particulate matter (PM, PM_{10}, and $PM_{2.5}$). The Tribes request that, at a minimum, the annual emission values included in Table 2 – Estimated Facility-Wide Emissions in the Proposed Allowable Emissions column be included in an enforceable condition in the permit. The annual emission limits should be enforceable on a 12-month rolling average basis.

   Further, the Tribes request that U.S. EPA provide its rationale for NOT including in the proposed permit 24-hour emission limits on PM_{10} and $PM_{2.5}$ emissions. These 24-hour emission limits are necessary to prohibit the facility from causing or contributing to exceedances of the 24-hour National Ambient Air Quality Standards (NAAQS) at the facility's limit of public access.

2. Best Practices for Emissions Reduction. In addition to the baghouse controls that will be required for the new elevator leg(s), truck unloading pit(s), and grain cleaning system, the Tribes request that U.S. EPA include Operational Requirements in the Permit that reflect "best practices" for country grain elevators to minimize particulate emissions and reduce potential impacts to air quality. These best practices could include:
   - Installing doors and/or adjusting the orientation of truck unloading station to reduce wind-tunnel effect at the unloading station;
   - Implementing choke-flow practices and or dead-box spouts to reduce grain fall distances and grain velocities and thereby reducing the generation of particulate emissions from truck unloading and truck/rail loading;
   - Reducing conveyor speeds to minimize emissions from transfers in the handling and cleaning operations.

   Including enforceable conditions in the MNSR Air Permit that require implementation of these "best practices" upstream of the cartridge style baghouse systems required in proposed condition D.3 will directly support the Purposes stipulated in the Tribes' draft Air Code and be consistent with the Tribes' interest in requiring Best Available Control Technology for all emission units at non-major sources on the Reservation. (See Section 602 Air Pollution Emission Standard for Non-Major Sources in the Tribes' draft Air Code.)

3. NSPS for Grain Elevators. It appears that the New Source Performance Standards (NSPS) requirements in 40 CFR Part 60 Subpart DD – Standards of Performance for Grain Elevators apply to the existing and proposed fugitive and process emissions sources at the CHS facility. Examples of opacity limitations in Subpart DD are: process

sources (e.g., emissions from the baghouse controlling emissions from the grain elevators cleaning and processing operations) = 0%; truck unloading = 5%; railcar loading = 5%; grain handling operation = 0%; truck loading = 10%.

However, the only opacity limit listed in the proposed permit is 20% (*see* I.D.2 of proposed Permit) from each cartridge style baghouse installed for the new enclosed elevator leg, truck unloading pit, and grain cleaning system. The Tribes request that U.S. EPA provide its rationale for not including in the proposed Permit the 0% opacity NSPS standards for process sources nor the other applicable NSPS opacity requirements for other particulate sources at this facility.

The Tribes request that U.S. EPA consider the MNSR Air Permit for the CHS facility to be the single document to include enforceable conditions that adequately address all applicable requirements of local and federal air rules and regulations, including applicable NSPS standards.

4. Air Quality Review. U.S. EPA has provided in the TSD a brief justification that an air quality review to demonstrate compliance with the NAAQS is not required for this modification. (See Section IV. Air Quality Review in the TSD.) In summary, U.S EPA cites proposed emission increases (17.9 tons per year of PM_{10} and 3 tons per year $PM_{2.5}$) at the CHS facility that are less than PSD significant emission rates and particulate concentrations monitored at the Fort Peck Monitor (AQS No. 30-085-9000) located north east of Poplar, MT that are below the NAAQS as the reasons that "there is expected to be very little effect on localized NAAQS values." (See TSD Section IV. Air Quality Review p. 8)

The Tribes do not consider the data presented in the TSD to be sufficient to justify U.S. EPA's conclusion that an air quality review is not warranted for the CHS facility. The proposed MNSR Air Permit for this source will allow up to 60-tons per year of PM_{10} emissions and 10 tons per year of $PM_{2.5}$. The proposed permit places no limitations on short-term (24-hour) particulate emissions, even though there are 24-hour health-based ambient air quality standards for PM_{10} and $PM_{2.5}$. The source is located near other known sources of particulate emissions (e.g., other country grain elevators; the BNSF railroad line; US Hwy 2), therefore, existing ambient levels of particulate concentrations proximate to the CHS facility may be higher than the concentrations monitored at the comparatively remote Fort Peck Monitor. From the limited emissions and air quality information presented in the TSD, the Tribes cannot concur with U.S. EPA that the particulate emissions from the expanded CHS facility will have very little effect on localized NAAQS values at the fence line of the facility.

The Tribes request that either U.S. EPA supplement the TSD to include information that more rigorously supports U.S. EPA's conclusion that an air quality review is not warranted or that U.S. EPA conducts a more technical air quality review (e.g., dispersion modeling) of the potential air quality impacts associated with emissions from the CHS facility. Further, the Fort Peck Indian Reservation is a designated Class I area for air quality planning purposes. The Purposes in Section 602 of the Tribes draft Air Code include the protection of air quality increment standards and Air Quality Related Values (AQRV) on the Reservation. The Tribes request that EPA include in its air quality review an assessment of the CHS facility's potential impact to applicable PSD increments and AQRVs given the Reservation's unique status as a Class I area.

The Tribes appreciate U.S EPA's efforts to implement the Minor New Source Review program in Indian Country. Thank you for considering the Tribes' comments on this proposed MNSR Air Permit and Technical Support Document. The Tribes' comments are intended to support U.S. EPA to approve a MNSR Permit for the proposed expanded CHS facility that adequately address all applicable federal air quality standards and NSPS emission standards. A MNSR Permit that adequately addresses the Tribes' comments should result in a well-designed, efficiently controlled, and properly permitted facility that will comply with applicable emissions and ambient air quality standards and afford adequate protection of human health and the air resources of the Reservation.

Please do not hesitate to contact Deb Madison, Director of OEP (office phone: (406) 768-2389; email: 2horses@nemontel.net) or me should you have questions or requests for additional information.

Regards,

For Vice-Chairman

Mr. Floyd Azure, Chairman

Assiniboine & Sioux Tribes of the Fort Peck Indian Reservation

Cc Deb Madison, OEP

Ashleigh Weeks, OEP

Samantha Azure, Tribal Attorney

5500 Cenex Drive
Inver Grove Heights, MN
55077-1721

651-355-6000
chsinc.com

VIA UPS DELIVERY

July 11, 2017

US EPA Region 8 Air Program, 8P-AR
1595 Wynkoop Street
Denver, CO 80202
Attn: Stuart Siffring

RE: CHS Comments on EPA Proposed Air Pollution Control Minor Source Permit to Construct #TMNSR-FP-000010-2015.001
CHS Farmers Elevator - Macon
6134 Hwy 13, Wolf Point, MT 59201
Fort Peck Indian Reservation

Dear Mr. Siffring:

CHS Inc. has reviewed the U.S. Environmental Protection Agency's proposed Air Pollution Control Minor Source Permit to Construct (#TMNSR-FP-000010-2015.001) for its' Farmers Elevator - Macon country grain elevator located at 6134 Highway 13, Wolf Point, Montana. The following comments and minor change requests are provided for the Agency's review and consideration.

1. Section C.1, Table 1; CHS wishes to clarify the Maximum Permitted Throughput limits for grain receiving activities. As written, it is CHS' understanding that the annual throughput limit for grain received by hopper trucks is 18,000,000 bushels and 1,800,000 bushels for straight trucks for a total of 19.8 million bushels. Does the allowable annual throughput limit for hopper trucks need to be offset by the quantity of bushels that is received annually by straight trucks up to 1.8 million bushels?
2. Section C.1, Table 1; CHS wishes to clarify the Maximum Permitted Throughput limits for grain loadout activities. As written, it is CHS' understanding that the annual throughput limit for grain loaded out by railcars is 18,000,000 bushels and 360,000 bushels by trucks for a total of 18.360 million bushels. Does the allowable annual throughput limit for railcars need to be offset by the quantity of bushels loaded out annually by trucks up to 360,000 bushels.
3. Section C.1, Table 1; Pursuant to our previous correspondence and discussion, CHS wishes to confirm our understanding that the Maximum Permitted Throughput limit for Storage Bin Venting is based upon the Maximum Permitted Throughput limit associated with grain received regardless of whether any of the grain received at the facility is moved to/from its storage bin more than once prior to shipment off-site, that the limit is all inclusive.
4. Section E, Item 3; Please advise if the initial performance testing required in Item 3 may be conducted by a trained and certified CHS representative or if a certified third party is required to conduct the respective opacity readings.

5. Section E, Item 3(a)(i); Please clarify if the required Method 9 testing must consist of three individual 30 minute runs or just one 30 minute run.
6. Section D.3; Please note that in a previous correspondence to the Agency, dated May 16, 2016, CHS indicated that the cartridge style baghouses would utilize the Donaldson Company's Ultra-Web MERV 15 filtering media. Due to performance/manufacturing issues this specific filtering media is no longer being manufactured and is not available for use. The Donaldson Company has substituted the Ultra-Web MERV 15 filtering media with the Ultra-Web MERV 13 filtering media. Product and technical information in respect to this substituted filtering media is attached for your review and reference. Based upon the information provided to CHS by the Donaldson Company, it is CHS' understanding that the substituted UltraWeb-MERV 13 filtering media will meet a control efficiency for filterable PM emissions of 99% and a control efficiency for filterable PM_{10} emissions of 93%. Please advise us if you have any concerns with this filtering media substitution.

If you have any questions or need any additional information in respect to CHS Inc.'s comments on the proposed Air Pollution Control Minor Source Permit to Construct for the Macon, Montana grain handling and storage facility, please contact me directly at 800-210-9324 or email at pete.mutschler@chsinc.com.

Thank you for your consideration of these comments.

Sincerely,

Pete Mutschler, CHS Inc.
Director of Environment and Safety, Country Operations

Attachments:

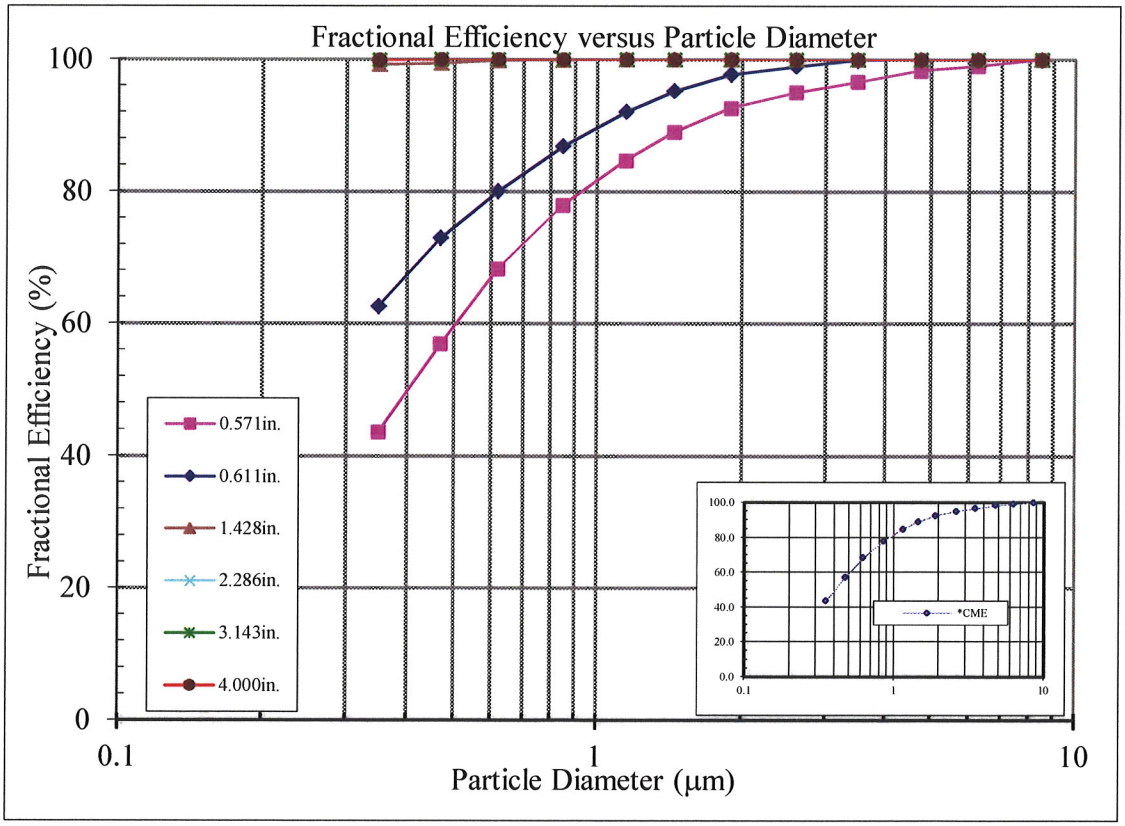
Cc: Deb Madison – Fort Peck Tribes Office of Environmental Protection
Mark Dreesen (CHS)
Jeff Schaefer (CHS)
Brian Duffy (CHS)

LMS Technologies, Inc.
6423 Cecilia Circle
Bloomington, MN 55439
(612) 918-9060, Fax: (612) 918-9061

Date :	August 18, 2011	Requested by :
Filter ID :	P033069-016-340	Donaldson Co.
Test Type :	52.2-2007 **REP# 2496**	Manufacturer :
Test Aerosol :	KCl, Neutralized	Donaldson Co.

ΔP (" H_2O)	0.571in.	0.611in.	1.428in.	2.286in.	3.143in.	4.000in.	*CME
Size Range (µm)	Fractional Efficiency (%)						
0.3-0.4	43.6	62.6	99.2	99.9	99.9	99.9	43.6
0.4-0.55	56.9	72.9	99.4	100.0	100.0	100.0	56.9
0.55-0.7	68.3	80.0	99.8	100.0	100.0	100.0	68.3
0.7-1.0	77.9	86.8	99.9	100.0	100.0	100.0	77.9
1.0-1.3	84.7	92.0	100.0	100.0	100.0	100.0	84.7
1.3-1.6	89.0	95.2	100.0	100.0	100.0	100.0	89.0
1.6-2.2	92.6	97.7	100.0	100.0	100.0	100.0	92.6
2.2-3.0	95.0	98.9	100.0	100.0	100.0	100.0	95.0
3.0-4.0	96.6	99.9	100.0	100.0	100.0	100.0	96.6
4.0-5.5	98.3	100.0	100.0	100.0	100.0	100.0	98.3
5.5-7.0	99.0	100.0	100.0	100.0	100.0	100.0	99.0
7.0-10.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

*** Composite Minimum Efficiency**



ENGINEERING APPROVAL
K.C. KWOK, PH.D._____

Donaldson
Filtration Solutions

Donaldson Company, Inc.
Industrial Air Filtration
1400 West 94th Street
Bloomington, MN
55431-2370

Mailing Address:
P.O. Box 1299
Minneapolis, MN
55440-1299 U.S.A.

Tel 952-887-3847
Fax 952-698-2479
www.Donaldson.com
www.donaldsontorit.com

Donaldson Company, Inc. Emissions Statement for Industrial Dust Collectors with Ultra-Web® Filter Media

Donaldson Company, Inc. offers an extensive variety of dust collectors and filter media designs to the market to address the wide variety of dust control applications and project needs.

Because dust control projects sometimes demand unique collector selection or location strategies or may involve complex filter media performance considerations it is difficult to make general statements of emission performance. However, Donaldson generally expects total (filterable) particulate emissions from Continuous-Duty Cartridge Collectors using Donaldson Ultra-Web filter media to be capable of achieving average emission levels of no more than 0.002 grains per dry standard cubic foot. This level of performance expectation excludes any contributions to emissions from condensable materials (*which will pass through filter media in a vapor state*), and it assumes filters are installed properly and are operated and maintained in accordance with industry best practice and in accordance with the manufacturer's Installation, Operation, and Maintenance manuals for the collector.

Factors which may contribute to unexpected collector emissions include: misuse, accident, abuse, modification, improper installation or operation, inadequate maintenance, and operation beyond recommended selection/sizing guidance or useful life. Emissions may also occur as a result of damage to collectors or filters due to accidents, fires, corrosion, abrasion, or other physical abuse.

Emission performance is also influenced by the style or size of collector selected, by the selection of filter media, and by choices in accessories or features for collectors.

Important Notice: Many factors beyond the control of Donaldson can affect the use and performance of Donaldson products in a particular application, including the conditions under which the product is used. Since these factors are uniquely within the user's knowledge and control, it is essential the user evaluate the Donaldson products to determine whether the product is fit for the particular purpose and suitable for the user's application. This Emissions Statement shall not be construed as or relied upon as a health and safety statement. Donaldson does not require or recommend exhausting emissions into the indoor environment without consultation with a qualified professional to evaluate and address all attendant health and safety risks. It shall be the end user's continued and sole responsibility to provide a safe and healthful environment for its employees.

Donaldson's terms and conditions of sale, as stated in our current quotation, contain the sole obligation and exclusive remedy for any issues that arise regarding information that Donaldson provides in this statement.

LMS TECHNOLOGIES, INC.

6423 Cecilia Circle
Bloomington, MN 55439
(952) 918-9060, Fax: (952) 918-9061

Test Report-ASHRAE Test Standard 52.2-2007

Report #: **1962**
Test Date: **12/30/2009**

Test Requested By:	**Donaldson Company**
Manufacturer:	**Donaldson Company**
Product Name:	**PowerCore**
Model Number:	**N/A**
Dimensions:	**8" x 22" Oblong**
Number of Pleats:	**Minipleat**
Filter Description:	**Blue, Synthetic Minipleat Filter**
How Filter Obtained:	**Provided by Donaldson**

Test Results

Test Air Flow Rate(CFM)/Velocity (FPM)	**600 cfm**
Initial Resistance (in. WG)	**0.602"**
Final Resistance (in. WG)	**1.400"**
Minimum Efficiency Rating Value **(MERV)**	**MERV 13 @ 600 cfm**
Minimum Average Efficiency 0.3 to 1.0 Microns **(E1)**	**60.5**
Minimum Average Efficiency 1.0 to 3.0 Microns **(E2)**	**91.4**
Minimum Average Efficiency 3.0 to 10 Microns **(E3)**	**99.6**
Dust Fed to Final Resistance (grams)	**97.7 grams**
Dust Holding Capacity (grams)	**97.2 grams**
Arrestance:	**99.5%**

Test Description

Temp & Humidity:	**71 @ 30%**
Particle Analysis:	**Hiac/Royco FE-80**
Test Dust:	**ASHRAE 52.1 Dust**
Test Aerosol:	**KCl, Neutralized**

Test Engineer :	**Mick Flom/Emile Tadros/Kian Imani/Pat Best**
Approved By:	**K. C. Kwok, Ph.D.**

LMS TECHNOLOGIES, INC.

6423 Cecilia Circle
Bloomington, MN 55439
(952) 918-9060, Fax: (952) 918-9061

Test Report-ASHRAE Test Standard 52.2-2007

Report #: **2496**
Test Date: **8/18/2011**

Test Requested By:	**Donaldson Co.**
Manufacturer:	**Donaldson Co.**
Filter ID:	**P033069-016-340**
Model Number:	**N/A**
Dimensions:	**30x20**
Number of Pleats:	**Mini-Pleats**
Filter Description:	**Blue synthetic mini pleat panel**
How Filter Obtained:	**Provided by Doanldson Co.**

Test Results

Test Air Flow Rate(CFM)/Velocity (FPM)	**1545 cfm/374fpm**
Initial Resistance (in. WG)	**0.571"**
Final Resistance (in. WG)	**4.00"**
Minimum Efficiency Rating Value **(MERV)**	**MERV 13 @ 1545 cfm**
Minimum Average Efficiency 0.3 to 1.0 Microns **(E1)**	**61.7**
Minimum Average Efficiency 1.0 to 3.0 Microns **(E2)**	**90.3**
Minimum Average Efficiency 3.0 to 10 Microns **(E3)**	**98.5**
Dust Fed to Final Resistance (grams)	**682.7 grams**
Dust Holding Capacity (grams)	**680.6 grams**
Arrestance:	**99.70%**

Test Description

Temp & Humidity:	**71° F @ 33%**
Particle Analysis:	**Hiac/Royco FE-80**
Test Dust:	**ASHRAE 52.1 Dust**
Test Aerosol:	**KCl, Neutralized**
LMS#:	**#1407**

Test Engineer :	**Al Vatine/Emile Tadros/Pat Best/Jose Tizcareno/Neima Mehran**
Approved By:	**K. C. Kwok, Ph.D.**

Data verified by LMS Calibration filter* Patent Pending

Donaldson
Torit®

THE ULTRA-WEB ADVANTAGE
MERV COMPARISON TABLE

Group	Std 52.2 MERV Ratings	Composite Avg. Particle Size Efficiency (PSE) (E_1) 0.3–1.0µ	(E_2) 1.0–3.0µ	(E_3) 3.0–10.0µ	Particle Size Ranges	Average Dust Spot Efficiency Std 52.1	Average Arrestance by ASHRAE 52.1 Method	Typical Filter Type	Typical Control Contaminant
5	20				≤ 0.30 µm	N/A	N/A	**HEPA/ULPA Filters** ≥ 99.999% efficiency on 0.10-0.20 µm particles, IEST Type F	**≤ 0.30 µm Particle Size** Virus (unattached) Carbon dust Sea salt All combustion smoke Radon progeny
	19							≥ 99.999% efficiency on 0.30 µm particles, IEST Type D	
	18							≥ 99.99% efficiency on 0.30 µm particles, IEST Type C	
	17							≥ 99.97% efficiency on 0.30 µm particles, IEST Type A	
4	16	≥ 95%	≥ 95%	≥ 95%	0.30–10 µm	80–95%+	> 98–99%	Membrane Technologies Nanofiber Technologies Ultra-Web	**0.30-1.0 µm Particle Size** All bacteria Most tobacco smoke Droplet nuclei (sneeze) Cooking oil Most smoke Insecticide dust Copier toner Most face powder Most paint pigments
	15	85%–94.9%	≥ 90%	≥ 90%					
	14	75%–84.9%	≥ 90%	≥ 90%					
	13	**≤ 75%**	**≥ 90%**	**≥ 90%**	**0.30-10 µm**	**80-95%+**	**>98-99%**		
3	12	—	80%–89.9%	≥ 85%	1.0–3.0 µm	40–75%	> 95–98%	Spunbonds (10-12) Fiber Blends (8-10) Cellulose (8-10)	**1.3-3.0 µm Particle Size** Legionella Humidifier dust Lead dust Milled flour Coal dust Auto emissions Nebulizer drops Welding fumes
	11	—	65%–79.9%	≥ 85%					
	10	—	50%–64.9%	≥ 85%					
	9	—	< 50%	≥ 85%					
2	8	—	—	70%–84.9%	3.0–10.0 µm	< 20–35%	80–95%	Fiber Blends Cellulose Panel Filters Dust and pollen Filters Furnace filters	**3.0-10.0 µm Particle Size** Mold Spores Hair spray Fabric protector Dusting aids Cement dust Pudding mix Snuff Powdered milk
	7	—	—	50%–69.9%					
	6	—	—	35%–49.9%					
	5	—	—	20%–34.9%					
1	4	—	—	< 20%	> 10.0 µm	< 20%	60–80%	Metal Foam Panel Filters Fiberglass	**> 10.0 µm Particle Size** Pollen Spanish moss Dust mites Sanding dust Spray paint dust Textile fibers Carpet fibers
	3	—	—	< 20%					
	2	—	—	< 20%					
	1	—	—	< 20%					

Donaldson Company, Inc.
Torit
P.O. Box 1299
Minneapolis, MN
55440-1299 U.S.A.

Tel 800-365-1331 (USA)
Tel 800-343-3639 (within Mexico)

donaldsontorit@donaldson.com
donaldsontorit.com

Siffring, Stuart

Subject: Notice of Public Comment Period – Proposed Permit to Construct on the Fort Peck Indian Reservation

Hello,

In accordance with the regulations at 40 CFR 49.157, the EPA is hereby providing notification of the availability for public comment of the proposed Clean Air Act minor New Source Review permit for the following source located on the Fort Peck Indian Reservation:

CHS Inc. Farmers Elevator - Macon

Electronic copies of the proposed permit, technical support document, application and other supporting permit information may be viewed online at http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8.

Paper copies of the proposed permit, technical support document, application, and other supporting permit information may be reviewed by contacting the Federal and/or Tribal contacts identified on the attached public notice bulletin.

Comments may be sent by mail to:

US EPA Region 8
Air Program Office
1595 Wynkoop Street, 8P-AR
Denver, CO 80202
Attn: Tribal NSR Coordinator

or

Electronically to R8AirPermitting@epa.gov

In accordance with the regulations at 40 CFR 49.157, the Agency is providing a 30-day period from June 12, 2017 to July 13, 2017 for public comment on this proposed permit. Comments must be received by 5:00pm MST July 13, 2017, to be considered in the issuance of the final permit. If a public hearing is held regarding this permit, you will be sent a copy of the public hearing notice at least 30 days in advance of the hearing date.

Thanks,

Stuart Siffring, P.E.
Tribal Air Permitting
US EPA Region 8 Air Program
Phone: (303) 312-6478
Fax: (303) 312-6064
https://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region

Siffring, Stuart

To: Kubler, Charley; Duffy, Brian
Cc: 2horses@nemont.net; Smith, Claudia; Fallon, Gail
Subject: Proposed Synthetic Minor NSR Permit for Farmers Elevator - Macon

Mr. Kubler,

I have attached the requested proposed permit, the accompanying technical support document, and the bulletin board notice for the Farmers Elevator - Macon. We will also be posting the application, proposed permit, technical support document, and other supporting information in PDF format on our website at https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8 by the start of the public comment period.

In accordance with the regulations at 40 CFR 49.157, we are providing a 30-day period from June 12, 2017 to July 13, 2017 for public comment on this proposed permit. Comments must be received by 5:00pm MST July 13, 2017, to be considered in the issuance of the final permit.

Please submit any written comments you may have concerning the terms and conditions of this permit. You can send them directly to me at Siffring.Stuart@epa.gov, or to r8airpermitting@epa.gov. Should the EPA not accept any or all of these comments, you will be notified in writing and will be provided with the reasons for not accepting them.
Thank you,

Stuart Siffring, P.E.
Tribal Air Permitting
US EPA Region 8 Air Program
Phone: (303) 312-6478
Fax: (303) 312-6064
https://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region

Public Notice: Request For Comments

Proposed Air Quality Permit to Construct
CHS Inc.
Farmers Elevator - Macon

Notice issued: June 12, 2017

Written comments due:
5 p.m., July 13, 2017

Where is the proposed facility location?
Fort Peck Indian Reservation
CHS Inc.
Farmers Elevator - Macon
6134 Hwy 13
Wolf Point, MT 59201
Latitude 48.10972N
Longitude 105.51833W

What is being proposed?
This permit action will apply to an existing facility operating on the Fort Peck Indian Reservation in Montana.

The facility is designed to store, clean, and transfer grain from local farms and is also known as a country grain elevator.

This MNSR permit action allows construction of an expansion to the existing grain elevator facility.

Proposed Permit Requirements:
CHS has requested that emission limits on the elevator legs, truck unloading pit, and grain cleaning area be put in place to reduce emissions of particulate matter (PM, PM_{10}, and $PM_{2.5}$).

What are the effects on air quality?
The impacts to local air quality from the proposed project are not expected to be significant and should not have an adverse impact on attainment of the NAAQS or cause or contribute to PSD increment violation.

Where can I send comments?
EPA accepts comments by mail, fax and e-mail.

US EPA Region 8 Air Program, 8P-AR
Attn: Federal Minor NSR Coordinator
1595 Wynkoop Street,
Denver, CO 80202
R8AirPermitting@epa.gov
Fax: 303-312-6064

How can I review documents?
You can review an electronic copy of the proposed permits and related documents at the following locations:

Assiniboine and Sioux Tribes
Environmental Programs Office
P.O. Box 1027
Poplar, Montana 59255-1027
Attn: Deb Madison, Environmental Programs Director
(406) 768-2300

and

US EPA Region 8 Office:
1595 Wynkoop Street, Denver, CO 80202
(Please call Stuart Siffring at 303-312-6478 in advance of your visit.)

US EPA Region 8 Website:
https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8-region-8

Permit number:
CHS Inc. Farmers Elevator - Macon
TMNSR-FP-000010-2015.001

What happens next?
EPA will review and consider all comments received during the comment period. Following this review, the EPA may issue the permit as proposed, issue a modified permit based on comments, or deny the permit

Tribal Minor New Source Review in Indian Country

United States Environmental Protection Agency

Region 8
Air Program
1595 Wynkoop Street
Denver, CO 80202
Phone 800-227-8917

United States Environmental Protection Agency
Region 8 Air Program
1595 Wynkoop Street
Denver, CO 80202

Air Pollution Control
Minor Source Permit to Construct

40 CFR 49.151

 # TMNSR-FP-000010-2015.001

Permit to construct to establish legally and practically enforceable limitations and requirements for new emissions sources at an existing facility

Permittee:

CHS, Inc.

Permitted Facility:

Farmers Elevator - Macon
Fort Peck Indian Reservation
Roosevelt County, Montana

Summary

On July 29, 2015, the EPA received an application from CHS Inc. (CHS) requesting a permit for a true minor new source of air pollutant emissions in accordance with the requirements of the Federal Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR part 49.

Through this permit action, the EPA is approving construction of a modification to an existing true minor country grain elevator on Indian country lands within the Fort Peck Indian Reservation, in Roosevelt County, Montana. The proposed modification is estimated to be a true minor source of criteria pollutants with respect to the MNSR Permit Program.

This permit contains production limits, emission control requirements, and associated monitoring, recordkeeping, and reporting requirements, for the modification project and/or certain pollutant emission-generating units or activities that are approved for construction and installation.

The EPA determined that this approval will not cause or contribute to violations of the National Ambient Air Quality Standards (NAAQS), or have potentially adverse effects on ambient air.

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I. Conditional Permit to Construct

A. General Information

Facility:	Farmers Elevator - Macon
Permit number:	TMNSR-FP-000010-2015.001
SIC Code and SIC Description:	5153 – Grain and Field Beans

Site Location:	Corporate Office Location:
Farmers Elevator - Macon	CHS, Inc
6134 Hwy 13, Wolf Point, MT 59201	5500 Cenex Drive
SENE ¼ Sec 9, T27N, R48E	Inver Grove Heights, MN 55077-1721
Latitude 48.10972N, Longitude 105.51833W	
Fort Peck Indian Reservation	
Roosevelt County, Montana	

The equipment listed in this permit may only be operated by CHS, Inc. (CHS) at the location described above.

B. Applicability

1. This Conditional Permit to Construct is being issued under authority of the MNSR Permit Program at 40 CFR part 49.

2. Any conditions for this facility or any specific pollutant emission-generating units or activities at this facility established pursuant to any permit to construct issued under the authority of the Prevention of Significant Deterioration Permit Program at 40 CFR Part 52 (PSD) or the MNSR Permit Program shall continue to apply.

3. By issuing this permit, the EPA does not assume any risk of loss which may occur as a result of the operation of the permitted facility by the Permittee, Owner, and/or Operator, if the conditions of this permit are not met by the Permittee, Owner, and/or Operator.

C. Construction and Operational Requirements

1. The Permittee is approved to install and operate the emissions-generating units or activities identified in Table 1, at up to the maximum permitted throughput.

Table 1. Approved Emissions Units and/or Activities and Maximum Permitted Throughput

Emission Unit/Activity Description	Maximum Permitted Throughput
Truck Receiving Area – Hopper truck	18,000,000 bushels of grain per year
Truck Receiving Area – Straight truck	1,800,000 bushels of grain per year
Grain Loadout Area - Truck	360,000 bushels of grain per year
Grain Loadout Area – Railcar	18,000,000 bushels of grain per year
Grain Handling	54,000,000 bushels of grain per year
Grain Cleaning	18,000,000 bushels of grain per year
Storage Bin venting	18,000,000 bushels of grain per year
Truck Traffic	20,000 vehicle trips per year

2. The Permittee shall maintain and operate each approved emission unit or activity, including any associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions of MNSR-regulated pollutants and considering the manufacturer's recommended operating procedures at all times, including periods of startup, shutdown, maintenance, and malfunction. The EPA will determine whether the Permittee is using acceptable operating and maintenance procedures based on information available, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the facility.

3. Only the emission units and activities that are operated and controlled as specified in this permit are approved for installation under this permit.

D. Grain Handling Emissions Control Requirements

1. The Permittee shall install, operate, and maintain:

   (a) One (1) cartridge style baghouse to control particulate emissions from each new enclosed elevator leg, and;
   (b) One (1) cartridge style baghouse to control particulate emissions from each new truck unloading pit, and;
   (c) One (1) cartridge style baghouse to control particulate emissions from the grain cleaning system.

2. Emissions shall not exceed 20 percent opacity from each cartridge style baghouse used to control emissions from each new enclosed elevator leg, truck unloading pit, and grain cleaning system.

3. Each cartridge style baghouse system shall be operated at a control efficiency for PM emissions of 99% or greater, and a control efficiency for PM_{10} emissions of 93% or greater.

E. Monitoring Requirements

1. *Baghouse Fabric and Cartridge Filter Inspections*: At least once per calendar month in which the permitted source operates, beginning with the first calendar month of operation after the effective date of this permit, the Permittee shall inspect the interior and exterior of each fabric cartridge/filter on each baghouse for evidence of leaking, damaged and/or missing filters, and take appropriate corrective actions to restore filters to proper operation before resuming normal operations.

2. *Baghouse Pressure Drop Monitoring:* The Permittee shall install, operate and maintain a device for measuring pressure drop across the baghouse system, with an operating range between 0.2 and 8 inches of water gauge. In addition, the permittee shall measure and keep records of the pressure drop across each baghouse system at least once per week for any week in which the baghouse is operated. If the pressure drop exceeds the specified operating range, the permittee shall take appropriate corrective action so that within 24 hours the filters are restored to proper operation.

3. *Initial Performance Test*: Within 60 days after achieving the maximum production rate at which the facility will operate the affected emissions units or activities, but not later than 180 days after the first day of operation after the effective date of this permit, the Permittee shall conduct an initial performance test to verify compliance with the applicable opacity limits in Condition D.2

of this permit. Performance tests shall meet the following requirements:

(a) Performance tests shall be conducted according to a test plan submitted to the EPA at least 45 days prior to the performance test;

(b) Performance tests shall be conducted while the facility is operating under typical operating conditions;

(c) Performance tests shall be conducted using EPA test Method 9 from 40 CFR part 60, appendix A with the following modifications:

(i) The duration of each Method 9 test shall be at least 30 minutes; and
(ii) Compliance with each opacity limit shall be determined based on the average of at least five six-minute averages.

4. *Additional Performance Tests*: Subsequent performance tests meeting the criteria of the initial performance test in Condition E.3 of this permit shall be performed whenever required by the EPA.

F. Recordkeeping Requirements

1. The Permittee shall maintain the permit application and all documentation supporting that application, including manufacturer or vendor specifications, for the duration of time that the affected emissions unit(s) is covered under this permit.

2. The Permittee shall retain all records required by this permit for a period of at least 5 years from the date the record was created.

3. Records shall be kept at the facility or the location that has day-to-day operational control over the facility.

4. The Permittee shall maintain records of the following:

(a) The amounts of grain loaded in and out of the facility (bushels) each month and consecutive 12-month periods;

(b) Daily hours of operation of the facility;

(c) The dates and results of each baghouse system pressure drop measurement performed pursuant to Condition E.2 of this permit, any corrective action taken as a result of each survey, and the result of any corrective action taken; and

(d) The results of each performance test conducted pursuant to Conditions E.3 and E.4 of this permit. At a minimum, the Permittee shall maintain records of:

(i) The date of each test;
(ii) Each test plan;
(iii) Any documentation required to approve an alternate test method;
(iv) Test conditions, including the amounts and types of products produced and the operating parameters of any control equipment;

(v) The results of each test; and
(vi) The name of the company or entity conducting the analysis.

(e) The dates and results of each cartridge/filter inspection performed pursuant to Condition E.1 of this permit. At a minimum, records shall include:

(i) The name of the person, company or entity conducting the survey;
(ii) Whether visible emissions were detected from any affected emissions unit;
(iii) Any corrective action taken; and
(iv) The result of the corrective action.

G. Notification and Reporting Requirements

1. *Notification of construction or modification, and operations*: The Permittee shall submit to the EPA a written or electronic notice within 30 days from when the Permittee begins actual construction of the new emissions units and/or activities approved for installation under this permit, and when the Permittee begins operations of new emissions units or activities or resumes operation of existing emissions units and/or activities.

2. *Annual Reports*

(a) The Permittee shall submit to the EPA an annual report no later than April 1 of each calendar year. The annual report shall cover the period from January 1 to December 31 of the previous calendar year. All reports shall be certified to truth and accuracy by the person primarily responsible for Clean Air Act compliance for the Permittee.

(b) The report shall include:

(i) An evaluation of the permitted source's compliance status with the requirements in this permit, including the actual annual emissions of PM, PM_{10} and $PM_{2.5}$;
(ii) Summaries of the required monitoring and recordkeeping in this permit; and
(iii) Summaries of deviation reports submitted pursuant to this permit.

3. *Notification of Change in Ownership or Operator*: If the permitted source changes ownership or operator, then the Permittee shall submit to the EPA a written or electronic notice within 90 days after the change in ownership or operator is effective. In the report, the Permittee shall provide the reviewing authority a written agreement containing a specific date for the transfer of ownership or operator, and an effective date on which the new owner or operator assumes partial and/or full coverage and liability under this permit. The submittal shall identify the previous owner or operator, and update the name, street address, mailing address, contact information, and any other information about the permitted source if it would change as a result of the change of ownership or operator. The Permittee shall ensure that the permitted source remains in compliance with this permit during any such transfer of ownership.

4. *Notification of closure*: The Permittee shall submit to the EPA a report of any permanent or indefinite closure in writing within 90 days after the cessation of all operations at the permitted source. The notification shall identify the owner, the current location, and the last operating location of the permitted source. It is not necessary to submit a report of closure for regular seasonal closures.

[Note: to help meet notification requirements, the EPA has developed forms "OWN" (for notifications of change in ownership) and "CLOSURE" (for notifications of facility closure). The forms may be found on the EPA's website at: https://www.epa.gov/caa-permitting/tribal-nsr-permits-region-8.]

5. Any documents required to be submitted under this permit, shall be submitted to:

   U.S. Environmental Protection Agency, Region 8
   Office of Enforcement, Compliance & Environmental Justice
   Air Toxics and Technical Enforcement Program, 8ENF-AT
   1595 Wynkoop Street
   Denver, Colorado 80202

   Documents may be submitted electronically to R8AirReportEnforcement@epa.gov.

6. *Deviation Reports*: The Permittee shall promptly submit to the EPA a written report of any deviations of permit requirements, including deviations attributable to upset conditions.

   (a) The deviation report shall include: the identity of the affected emissions unit or activity where the deviation occurred; the nature, duration, and probable cause of the deviation; and any corrective actions or preventative measures taken to minimize emissions from the deviation and to prevent future deviations.

   (b) A "prompt" deviation report is one that is post marked or submitted via electronic mail to R8AirReportEnforcement@epa.gov as follows:

      (i) Within 72 hours of the discovery of deviations from any control efficiency in this permit; and
      (ii) By April 1 for the discovery of a deviation of recordkeeping or other permit conditions during the preceding calendar year that do not affect the Permittee's ability to meet the emissions limitations in this permit.

7. The Permittee shall submit a report for any required performance test to the EPA within 60 days after completing the tests, in accordance with the performance test recordkeeping requirements in this permit.

8. The Permittee shall submit any record or report required by this permit upon EPA request.

II. General Provisions

A. Conditional Approval:

Pursuant to the authority of 40 CFR 49.151, the EPA hereby conditionally grants this permit to construct. This authorization is expressly conditioned as follows:

1. *Document Retention and Availability:* This permit and any required attachments shall be retained and made available for inspection upon request at the location set forth herein.

2. *Permit Application:* The Permittee shall abide by all representations, statements of intent and agreements contained in the application submitted by the Permittee. The EPA shall be notified 10 days in advance of any significant deviation from this permit application as well as any plans,

specifications or supporting data furnished.

3. *Permit Deviations:* The issuance of this permit may be suspended or revoked if the EPA determines that a significant deviation from the permit application, specifications, and supporting data furnished has been or is to be made. If the proposed source is constructed, operated, or modified not in accordance with the terms of this permit, the Permittee will be subject to appropriate enforcement action.

4. *Compliance with Permit:* The Permittee shall comply with all conditions of this permit, including emission limitations that apply to the affected emissions units at the permitted facility/source. Noncompliance with any permit term or condition is a violation of this permit and may constitute a violation of the Clean Air Act and is grounds for enforcement action and for a permit termination or revocation.

5. *Fugitive Emissions:* The Permittee shall take all reasonable precautions to prevent and/or minimize fugitive emissions during the construction period.

6. *NAAQS and PSD Increment:* The permitted source shall not cause or contribute to a National Ambient Air Quality Standard violation or a PSD Increment violation.

7. *Compliance with Federal and Tribal Rules, Regulations, and Orders:* Issuance of this permit does not relieve the Permittee of the responsibility to comply fully with all other applicable federal and tribal rules, regulations, and orders now or hereafter in effect.

8. *Enforcement:* It is not a defense, for the Permittee, in an enforcement action, to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

9. *Modifications of Existing Emissions Units/Limits:* For proposed modifications, as defined at 40 CFR 49.152(d), that would increase an emissions unit allowable emissions of pollutants above its existing permitted annual allowable emissions limit, the Permittee shall first obtain a permit modification pursuant to the MNSR regulations approving the increase. For a proposed modification that is not otherwise subject to review under the PSD or MNSR regulations, such proposed increase in the annual allowable emissions limit shall be approved through an administrative permit revision as provided at 40 CFR 49.159(f).

10. *Relaxation of Legally and Practically Enforceable Limits:* At such time that a new or modified source within this permitted facility/source or modification of this permitted facility/source becomes a major stationary source or major modification solely by virtue of a relaxation in any legally and practically enforceable limitation which was established after August 7, 1980, on the capacity of the permitted facility/source to otherwise emit a pollutant, such as a restriction on hours of operation, then the requirements of the PSD regulations shall apply to the source or modification as though construction had not yet commenced on the source or modification.

11. *Revise, Reopen, Revoke and Reissue, or Terminate for Cause:* This permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee, for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. The EPA may reopen this permit for a cause on its own initiative, e.g., if this permit contains a material mistake or the Permittee fails to assure compliance with the applicable requirements.

12. *Severability Clause:* The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

13. *Property Rights:* This permit does not convey any property rights of any sort or any exclusive privilege.

14. *Information Requests:* The Permittee shall furnish to the EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating this permit or to determine compliance with this permit. For any such information claimed to be confidential, you shall also submit a claim of confidentiality in accordance with 40 CFR part 2, subpart B.

15. *Inspection and Entry:* The EPA or its authorized representatives may inspect this permitted facility/source during normal business hours for the purpose of ascertaining compliance with all conditions of this permit. Upon presentation of proper credentials, the Permittee shall allow the EPA or its authorized representative to:

    (a) Enter upon the premises where this permitted facility/source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of this permit;

    (b) Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of this permit;

    (c) Inspect, during normal business hours or while this permitted facility/source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

    (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements; and

    (e) Record any inspection by use of written, electronic, magnetic and photographic media.

16. *Permit Effective Date:* This permit is effective immediately upon issuance unless comments resulted in a change in the proposed permit, in which case the permit is effective 30 days after issuance. The Permittee may notify the EPA, in writing, that this permit or a term or condition of it is rejected. Such notice should be made within 30 days of receipt of this permit and should include the reason or reasons for rejection.

17. *Permit Transfers:* Permit transfers shall be made in accordance with 40 CFR 49.159(f). The Air Program Director shall be notified in writing at the address shown below if the company is sold or changes its name.

    U.S. Environmental Protection Agency, Region 8
    Office of Partnerships and Regulatory Assistance
    Tribal Air Permitting Program, 8P-AR
    1595 Wynkoop Street
    Denver, Colorado 80202

18. *Invalidation of Permit:* This permit becomes invalid if construction is not commenced within 18 months after the effective date of this permit, construction is discontinued for 18 months or more, or construction is not completed within a reasonable time. The EPA may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between the construction of the approved phases of a phased construction project. The Permittee shall commence construction of each such phase within 18 months of the projected and approved commencement date.

19. *Notification of Start-Up:* The Permittee shall submit a notification of the anticipated date of initial start-up of this permitted source to the EPA within 60 days of such date, unless this permitted source is an existing source.

B. Authorization:

Authorized by the United States Environmental Protection Agency, Region 8

_____

Scott Jackson, Acting Director Date
Air Program

United States Environmental Protection Agency
Region 8 Air Program
Air Pollution Control Minor Source Permit to Construct
Technical Support Document for
Proposed Permit No. TMNSR-FP-000010-2015.001

CHS Inc.
Farmers Elevator
Fort Peck Indian Reservation
Roosevelt County, Montana

In accordance with the requirements of the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR part 49, this federal permit to construct is being issued under authority of the Clean Air Act (CAA). The EPA has prepared this technical support document describing the conditions of this permit and is presenting information that is germane to this permit action.

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I. Introduction

On July 29, 2015, the EPA received an application from CHS Inc. (CHS) requesting a permit for a true minor new source of air pollutant emissions in accordance with the requirements of the MNSR Permit Program.

On April 14, 2016, the EPA published for public comment an earlier proposed version of this permit. The comments received led to multiple changes to the testing and monitoring permit conditions. It was determined that in order for the new permit language to have the input of the public, a new public comment period of 30 days would be reopened.

Through this permit action, the EPA is proposing to approve construction of a modification to an existing country grain elevator[1] on Indian country lands within the Fort Peck Indian Reservation, in Roosevelt County, Montana. The proposed modification is estimated to be a true minor new source of criteria pollutants with respect to the MNSR Permit Program.

This proposed permit contains production limits, emission control requirements, and associated monitoring, recordkeeping, and reporting requirements, for the modification project and/or certain pollutant emission-generating units or activities approved for construction and installation.

II. Facility Description

The CHS Farmers Elevator is located on Indian country lands within the Fort Peck Indian Reservation in the SENE ¼ of Section 9, Township 27 North, Range 48 East, Roosevelt County, Montana, at latitude 48.10972N and longitude 105.51833W.

This enclosed grain handling and storage facility, with an existing permanent storage capacity of 996,000 bushels, currently receives, cleans and stores various grains from local farmers for storage until shipment to a variety of markets via rail car. Area grain is hauled to the facility from local farmers via hopper trucks (approximately 98%) and straight trucks (approximately 2%) and routed to the receiving area of the grain elevator, where grain is gravity fed into a receiving pit for placement into storage. Grain is transferred through the grain elevator from the receiving pit(s) to storage bins by means of various conveyors and elevator legs, typical of country grain elevators across the United States.

When ready for shipment, the shipping conveyors and elevator legs distribute grain to the bulk weighing system prior to load-out into railcars. A very small portion (less than 1%) of grain products is transported via hopper truck for transfer to other CHS Inc. operations. The grain received at the elevator is cleaned by moving over a grate at the same time it is being physically transferred from the receiving area and placed into the storage bins. A minor portion of grain is cleaned as a separate operation due to limited storage. The existing receiving pit, the elevator legs and the cleaning system are, and will continue to be, equipped with a total of three cyclone systems for the control of particulate matter (PM, PM_{10} and $PM_{2.5}$).

The facility does not currently combust either natural gas, propane or fuel oil for either grain drying or convenience heating purposes. There are no temporary grain storage areas (i.e. outside bunkers) onsite.

[1] A country grain elevator is defined as a facility that receives more than 50 percent of its grain from farmers in the immediate vicinity during the harvest season.

Fumigation is not performed at the elevator.

CHS Farmers Elevator is proposing to expand the overall receiving, storing, cleaning and shipping capacities of the existing facility. This expansion would include: two additional truck receiving pits with baghouses for control of particulate matter; 14 additional silos and bins that would increase the permanent storage capacity for the facility to approximately 1,920,000 bushels; a new railcar receiving hopper (pit); a new grain moving and handling system; an additional cleaning system with a baghouse for control of particulate matter; additional grain load-out capacity for railcars, and associated conveyors and elevator legs with baghouses for control of particulate matter. With the expansion, the maximum throughput capacity of the facility is estimated at around 18,000,000 bushels per year.

Table 1, Existing and Proposed Emissions Units and/or Activities and Maximum Operational Design, shows the emission-generating units and activities that are currently installed and operating at the existing facility, as well as those that are proposed to be approved for installation and operation at the existing facility. Table 2, Estimated Facility-Wide Emissions provides an accounting of uncontrolled and controlled emissions in tons per year (tpy) for the current and proposed configuration of the existing facility.

Table 1 – Existing and Proposed Approved Emissions Units and/or Activities and Maximum Operational Design

Description	**Maximum Operational Design**	**Maximum for Potential Emissions Calculations (1.2xMax)**
Existing Emission Units/Activities (Maximum of last 5 years)		
Truck Receiving Area – Hopper truck	12,093,000 bushels of grain per year	14,511,606 bushels of grain per year
Truck Receiving Area – Straight truck	246,805 bushels of grain per year	296,166 bushels of grain per year
Grain Loadout Area - Truck	61,694 bushels of grain per year	74,033 bushels of grain per year
Grain Loadout Area – Railcar	12,278,111 bushels of grain per year	14,733,739 bushels of grain per year
Grain Handling	26,530,582 bushels of grain per year	31,834,713 bushels of grain per year
Grain Cleaning	12,339,805 bushels of grain per year	14,807,773 bushels of grain per year
Storage Bin venting	12,339,805 bushels of grain per year	14,807,773 bushels of grain per year
Truck Traffic	10,577 vehicle trips per year	12,692 vehicle trips per year
New Proposed Emission Units/Activities with expansion		
Truck Receiving Area – Hopper truck	15,000,000 bushels of grain per year	18,000,000 bushels of grain per year
Truck Receiving Area – Straight truck	1,500,000 bushels of grain per year	1,800,000 bushels of grain per year
Grain Loadout Area - Truck	300,000 bushels of grain per year	360,000 bushels of grain per year
Grain Loadout Area – Railcar	15,000,000 bushels of grain per year	18,000,000 bushels of grain per year
Grain Handling	45,000,000 bushels of grain per year	54,000,000 bushels of grain per year
Grain Cleaning	15,000,000 bushels of grain per year	18,000,000 bushels of grain per year
Storage Bin venting	15,000,000 bushels of grain per year	18,000,000 bushels of grain per year
Truck Traffic	16,667 vehicle trips per year	20,000 vehicle trips per year

Table 2 – Estimated Facility-Wide Emissions

Pollutant	Current Allowable Emissions (tpy)*	Post-Change Potential Emissions (tpy)*	Proposed Allowable Emissions (tpy)*	Proposed Change in Allowable Emissions (tpy)
PM	132.46	178.38	178.38	45.92
PM_{10}	41.22	59.12	59.12	17.9
$PM_{2.5}$	6.98	10.03	10.03	3.05
SO_2	NA	NA	NA	NA
NO_X	NA	NA	NA	NA
CO	NA	NA	NA	NA
VOC	NA	NA	NA	NA
Pb	NA	NA	NA	NA
Fluorides	NA	NA	NA	NA
H_2SO_4	NA	NA	NA	NA
H_2S	NA	NA	NA	NA
TRS	NA	NA	NA	NA
RSC	NA	NA	NA	NA
Greenhouse Gases				
CO_2e (Total)	NA	NA	NA	NA
Hazardous Air Pollutants (HAP)				
Formaldehyde	NA	NA	NA	NA
Benzene	NA	NA	NA	NA
Toluene	NA	NA	NA	NA
Ethylbenzene	NA	NA	NA	NA
Xylene	NA	NA	NA	NA
Total HAP's	**0**	**0**	**0**	**0**

PM - Particulate Matter
PM_{10} – Particulate Matter less than 10 microns in size
$PM_{2.5}$ – Particulate Matter less than 2.5 microns in size
SO_2 - Sulfur Dioxide
NO_X - Nitrogen Oxides
CO - Carbon Monoxide
VOC - Volatile Organic Compound
Pb - Lead and lead compounds
Fluorides - Gaseous and particulates
H_2SO_4 - Sulfuric Acid Mist
H_2S - Hydrogen Sulfide
TRS - Total Reduced Sulfur
RSC - Reduced Sulfur Compounds
CO_2e – Equivalent carbon dioxide (CO_2). A measure used to compare the emissions from various greenhouse gases based upon their global warming potential

* The current allowable emissions represent the current facility configuration and account for existing legally and practically enforceable restrictions. The post-change potential emissions include the potential uncontrolled emissions from the proposed modification project. The proposed allowable emissions represent the controlled emissions of the proposed modification project.

III. Proposed MNSR Permit Emission Limits and Controls

According to the requirements at 40 CFR 49.154(c), the EPA must determine the emission limitations required in a true minor source site-specific MNSR permit by conducting a case-by-case control technology review to determine the appropriate level of control, if any, to assure that the National Ambient Air Quality Standard (NAAQS) are achieved. In carrying out this case-by case control technology review, the EPA must consider the following factors: 1) local air quality conditions; 2) typical control technology or other emission reduction measures used by similar sources in surrounding areas; 3) anticipated economic growth; and 4) cost effective emission reduction alternatives. For this permit, the EPA considered regulations that apply to the equipment at grain elevator facilities. The Standards of Performance for Grain Handling Facilities at 40 CFR part 60, subpart A and DD contain requirements for what the EPA has determined is the best systems of emissions reductions (BSER) adequately demonstrated[2] for the relevant process equipment for certain new grain elevators and the associated cleaning and screening operations. We also reviewed other federal and state air pollution control permits for the sources to determine typical control requirements.

[2] BSER is determined in New Source Performance Standards by taking into account such factors as the cost, availability, level of use among existing sources, non-air quality health and environmental impact, energy requirements, amount of air pollution reduced, and technological innovation.

Based on our review of existing relevant regulations and existing federal and state permits for grain handling operations, especially similar grain elevator permits from Montana Department of Environmental Quality, we agree with CHS's proposal to install and operate the following control devices to reduce emissions from the new equipment:

1. One (1) cartridge style baghouse to control particulate emissions from each new enclosed elevator leg;
2. One (1) cartridge style baghouse to control particulate emissions from each new truck unloading pit, and
3. One (1) new bag house to control particulate emissions from the new grain cleaning system.

EPA guidance[3] suggests multiplying the maximum capacity of the facility by 1.2 to account for the possibility of record harvests. Therefore, the emission and throughput limits are based a throughput of 18,000,000 bushels per year. The grain handling operation takes that limit and multiplies it by 3 to account for grain being moved around the facility multiple times before being loaded onto the train or truck.

We are proposing monitoring, recordkeeping, and reporting requirements to ensure compliance with the production limits, and emission control requirements, including:

1. Monthly fabric/cartridge filter inspections;
2. Monitoring of the baghouse pressure drop;
3. Monthly visual emission surveys;
4. Records of the amounts of grain received and transferred (monthly and annual);
5. Records of grain production (daily, monthly, and annual);
6. Records of daily hours of operation for each controlled piece of equipment;
7. Notifications of beginning construction and operations;
8. Annual reports certifying compliance with the permit; and
9. Reports of permit deviations.

The proposed permit establishes emission control requirements that are consistent with what is required of country grain elevator operations across the country in attainment areas. As such, the proposed control technologies are considered widely available; and after considering anticipated economic growth in the area and more cost-effective alternatives, we determined that it was not necessary to make any additional changes to the proposal at this time.

IV. Air Quality Review

The Federal Minor New Source Review Regulations at 40 CFR 49.154(d) require that an Air Quality Impact Assessment (AQIA) modeling analysis be performed if there is reason to be concerned that new construction would cause or contribute to a NAAQS or Prevention of Significant Deterioration (PSD) increment violation. If an AQIA reveals that the proposed construction could cause or contribute to a NAAQS or PSD increment violation, such impacts must be addressed before a pre-construction permit can be issued.

[3] Guidance on calculating PTE of Country Grain Elevators can be found at www.epa.gov/region07/air/title5/t5memos/grainfnl.pdf

The area surrounding the project area is currently considered to attain the NAAQS for all criteria pollutants. Data was collected and reviewed from the EPA's Air Quality System (AQS) database for air monitors in Roosevelt County for 2014-2016. These data confirmed that the air quality in Roosevelt County has not exceeded the NAAQS standards for criteria pollutants being emitted from this facility ($PM_{2.5}$ and PM_{10}) for the most recent available 3 years of data. The available data for pollutants is summarized in Table 3.

Table 3. 2014-2016 Air Quality Data for Roosevelt County

Site Name and AQS Number	NAAQS Pollutant & Standard Criteria	2014*	2015*	2016*#	2015 Design Value	2016 Design Value	Current NAAQS Standard
Fort Peck 30-085-9000 (non-regulatory monitor)	$PM_{2.5}$ – 98th Percentile, 24-hr (µg/m^3)	12	39.6	11.4	23	21	35
	$PM_{2.5}$ – Weighted Mean, annual (µg/m^3)	3.57	4.94	2.34	5	4	12
	PM 10 – Highest Value, 24-hr (µg/m^3)	34.7	82.6	15.3	-	-	150 µg/m^3, not to be exceeded more than once per year

Incomplete data year

* The AQS database, located online at http://www.epa.gov/aqs, is updated by state, local, and tribal organizations who generate, review and submit the data. Compliance with the NAAQS is determined by comparison to a "design value" that is calculated based on a three-year average of the annual standard criteria values for each NAAQS pollutant. Regulatory design value data is available online at http://www3.epa.gov/airtrends/values.html.The values in this table represent data reported as accessed on April 20, 2017. Exceptional Events are excluded, which should not be used to determine background air quality or NAAQS compliance.

CHS Farmers Elevator - Macon Proposed Modification Characteristics and Estimated Emissions

The CHS Farmers Elevator is located at an elevation of 2,090 feet above mean sea level. The area immediately surrounding the site is predominately agricultural and rural in nature. The annual average precipitation for 2014-2016 was 13.11 inches, with the highest annual precipitation of 15.83 inches occurring in 2016. The average highest temperature during this timeframe was 102.3 degrees Fahrenheit, while the average lowest temperature was -28.3 degrees Fahrenheit. The highest temperatures were measured during the months of July and August, while the lowest temperatures were measured in January and December.[4]

The CHS Farmers Elevator is an existing minor source for the purposes of the PSD Permit Program at 40 CFR part 52. The proposed project is not a major modification, as defined under the PSD Permit Program, as the potential to emit all NSR-regulated pollutants for the project is less than 250 tpy and

[4] 2014-2016 data accessed from the National Centers for Environmental Information, National Oceanic and Atmospheric Administration, Climate Data Online website at http://www.ncdc.noaa.gov/cdo-web/, for the Wolf Point International Airport Station (Latitude: 48.09444° N, Longitude: 105.57444°W).

the proposed increase in allowable emissions for all NSR regulated pollutants for the project are less than the respective significant emission rates for major PSD sources at 40 CFR 52.21(b)(23)(i). The proposed project is estimated to result in an increase in allowable emissions of 17.9 tpy PM_{10}, and 3.05 tpy $PM_{2.5}$ emissions. Since the background concentration of PM_{10} and $PM_{2.5}$ in Roosevelt County is low in comparison to the NAAQS, there is expected to be very little effect on localized NAAQS values. Therefore, the impacts to local air quality from the proposed project are not expected to be significant and should not have an adverse impact on attainment of the NAAQS or cause or contribute to PSD increment violation. We have determined that an AQIA modeling analysis is not required for this permit action.

V. Tribal Consultations and Communications

All minor source applications (synthetic minor, modification to an existing major source, new true minor or general permit) are submitted to both the Tribes and the EPA per the application instructions (see http://www.epa.gov/caa-permitting/tribal-nsr-permitting-region-8). The Tribes are asked to respond to us with questions and comments on the application within 10 business days of receiving it. In the event an AQIA is triggered, we email a copy of that document to the Tribes as soon as we receive it.

Additionally, we notify the Assiniboine and Sioux Indian Tribes of the public comment period for the draft permit and provide copies of the notice of public comment opportunity to post in various locations of their choosing on the Reservation. We also notify the Tribes of the issuance of the final permit.

VI. Environmental Justice

On February 11, 1994, the President issued Executive Order 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." The Executive Order calls on each federal agency to make environmental justice a part of its mission by "identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations."

The EPA defines "Environmental Justice" as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and polices. The EPA's goal with respect to Environmental Justice in permitting is to enable overburdened communities to have full and meaningful access to the permitting process and to develop permits that address environmental justice issues to the greatest extent practicable under existing environmental laws. *Overburdened* is used to describe the minority, low-income, tribal and indigenous populations or communities in the United States that potentially experience disproportionate environmental harms and risks as a result of greater vulnerability to environmental hazards.

This discussion describes our efforts to identify overburdened communities and assess potential effects in connection with issuing this permit in Roosevelt County on Indian country lands within the Fort Peck Indian Reservation.

A. Environmental Impacts to Potentially Overburdened Communities

This permit action authorizes the construction of new air emission sources at an existing facility with

the potential to emit air pollutants at minor source levels under the MNSR Permit Program. The existing facility is located in a rural area primarily used for livestock grazing and other agricultural uses. The total net emissions increases for this project are below the major source PSD thresholds for all criteria pollutants. The ambient air measurements show existing air quality in the project area currently meets the NAAQS. The new emission sources would be controlled using baghouses with 93% - 99% particulate matter control efficiency. Therefore, the impacts to local air quality from the proposed project are not expected to be significant.

For purposes of Executive Order 12898 on environmental justice, the EPA has recognized that compliance with the NAAQS is "emblematic of achieving a level of public health protection that, based on the level of protection afforded by a primary NAAQS, demonstrates that minority or low-income populations will not experience disproportionately high and adverse human health or environmental effects due to the exposure to relevant criteria pollutants." (*In re Shell Gulf of Mexico, Inc. & Shell Offshore, Inc.*, 15 E.A.D., slip op. at 74 (EAB 2010)). This is because the NAAQS are health-based standards, designed to protect public health with an adequate margin of safety, including sensitive populations such as children, the elderly, and asthmatics.

Based on the findings described above, the EPA has concluded that issuance of the permit is not expected to have disproportionately high or adverse human health effects on overburdened communities in the vicinity of the facility on the Fort Peck Indian Reservation.

B. Enhanced Public Participation

Given the presence of potentially overburdened communities in the vicinity of the facility, we are providing an enhanced public participation process for this permit.

1. Interested parties can subscribe to an EPA listserve that notifies them of public comment opportunities on the Fort Peck Indian Reservation for proposed air pollution control permits via email at http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8.

2. All minor source applications (synthetic minor, modification to an existing facility, new true minor or general permit) are submitted to both the Tribes and the EPA per the application instructions (see http://www.epa.gov/caa-permitting/tribal-nsr-permitting-region-8).

3. The Tribes are asked to respond to the EPA with questions and comments on the application within 10 business days of receiving it.

4. In the event an AQIA is triggered, we email a copy of that document to the Tribes within 5 business days from the date we receive it.

5. We notify the Tribes of the public comment period for the proposed permit and provide copies of the notice of public comment opportunity to post in various locations of their choosing on the Reservation. We also notify the Tribes of the issuance of the final permit.

VII. Authority

Requirements under 40 CFR 49.151 to obtain a MNSR permit apply to new and modified minor stationary sources, and minor modifications at existing major stationary sources ("major" as defined in

40 CFR 52.21). In addition, the MNSR program provides a mechanism for an otherwise major stationary source to voluntarily accept restrictions on its potential to emit to become a synthetic minor source. The EPA is charged with direct implementation of these provisions where there is no approved Tribal implementation plan for implementation of the MNSR regulations. Pursuant to Section 301(d)(4) of the CAA (42 USC 7601(d)), the EPA is authorized to implement the MNSR regulations at 40 CFR 49.151 in Indian country. The CHS Farmers Elevator modification project is proposed to be located within the exterior boundaries of the Fort Peck Indian Reservation in the eastern part of the State of Montana. The exact location is latitude 48.10972N and longitude 105.51833W, in Roosevelt County, Montana.

VIII. Public Notice & Comment, Hearing, and Appeals

A. Public Notice

In accordance with 40 CFR 49.157, we must provide public notice and a 30-day public comment period to ensure that the affected community and the general public have reasonable access to the application and proposed permit information. The application, the proposed permit, this technical support document, and all supporting materials for the proposed permit are available at:

Assiniboine and Sioux Tribes
Environmental Programs Office
P.O. Box 1027
Poplar, Montana 59255-1027
Contact: Deb Madison at (406) 768-2300 or 2horses@nemont.net

and

US EPA Region 8
Air Program Office
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202-1129
Contact: Stuart Siffring at (303) 312-6478 or siffring.stuart@epa.gov

All documents are available for review at our office Monday through Friday from 8:00 a.m. to 4:00 p.m. (excluding Federal holidays). Additionally, the proposed permit, technical support document, and other supporting documents can be reviewed on our website at http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8.

Any person may submit written comments on the proposed permit and may request a public hearing during the public comment period. These comments must raise any reasonably ascertainable issue with supporting arguments by the close of the public comment period (including any public hearing). Comments may be sent to us at the address above, or sent via an email to r8airpermitting@epa.gov, with the topic "Comments on MNSR Permit for CHS Farmers Elevator."

B. Public Hearing

A request for a public hearing must be in writing and must state the nature of the issues proposed to be raised at the hearing. We will hold a hearing whenever there is, on the basis of requests, a significant degree of public interest in a proposed permit. We may also hold a public hearing at our discretion,

whenever, for instance, such a hearing might clarify one or more issues involved in the permit decision.

C. Final MNSR Permit Action

In accordance with 40 CFR 49.159, a final permit becomes effective 30 days after permit issuance, unless: (1) a later effective date is specified in the permit; or (2) appeal of the final permit is made as detailed in the next section; or (3) we may make the permit effective immediately upon issuance if no comments resulted in a change in the proposed permit or a denial of the permit. We will send notice of the final permit action to any individual who commented on the proposed permit during the public comment period. In addition, we will add the source to a list of final NSR permit actions which is posted on our website at http://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8. Anyone may request a copy of the final MNSR permit at any time by contacting the Region 8 Tribal Air Permit Program at (800) 227-8917 or sending an email to r8airpermitting@epa.gov.

D. Appeals to the Environmental Appeals Board (EAB)

In accordance with 40 CFR 49.159, within 30 days after a final permit decision has been issued, any person who filed comments on the proposed permit or participated in the public hearing may petition the Board to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when the Region has fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is, under section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we deny or issue a final permit and agency review procedures are exhausted.

Siffring, Stuart

To: Kubler, Charley; Duffy, Brian
Cc: 2horses@nemont.net; Smith, Claudia; Fallon, Gail
Subject: Proposed Synthetic Minor NSR Permit for Farmers Elevator - Macon

Mr. Kubler,

I have attached the requested proposed permit, the accompanying technical support document, and the bulletin board notice for the Farmers Elevator - Macon. We will also be posting the application, proposed permit, technical support document, and other supporting information in PDF format on our website at https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8 by the start of the public comment period.

In accordance with the regulations at 40 CFR 49.157, we are providing a 30-day period from June 12, 2017 to July 13, 2017 for public comment on this proposed permit. Comments must be received by 5:00pm MST July 13, 2017, to be considered in the issuance of the final permit.

Please submit any written comments you may have concerning the terms and conditions of this permit. You can send them directly to me at Siffring.Stuart@epa.gov, or to r8airpermitting@epa.gov. Should the EPA not accept any or all of these comments, you will be notified in writing and will be provided with the reasons for not accepting them.
Thank you,

Stuart Siffring, P.E.
Tribal Air Permitting
US EPA Region 8 Air Program
Phone: (303) 312-6478
Fax: (303) 312-6064
https://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region

Siffring, Stuart

Subject: Notice of Public Comment Period – Proposed Permit to Construct on the Fort Peck Indian Reservation

Hello,

In accordance with the regulations at 40 CFR 49.157, the EPA is hereby providing notification of the availability for public comment of the proposed Clean Air Act minor New Source Review permit for the following source located on the Fort Peck Indian Reservation:

CHS Inc. Farmers Elevator - Macon

Electronic copies of the proposed permit, technical support document, application and other supporting permit information may be viewed online at http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8.

Paper copies of the proposed permit, technical support document, application, and other supporting permit information may be reviewed by contacting the Federal and/or Tribal contacts identified on the attached public notice bulletin.

Comments may be sent by mail to:

US EPA Region 8
Air Program Office
1595 Wynkoop Street, 8P-AR
Denver, CO 80202
Attn: Tribal NSR Coordinator

or

Electronically to R8AirPermitting@epa.gov

In accordance with the regulations at 40 CFR 49.157, the Agency is providing a 30-day period from June 12, 2017 to July 13, 2017 for public comment on this proposed permit. Comments must be received by 5:00pm MST July 13, 2017, to be considered in the issuance of the final permit. If a public hearing is held regarding this permit, you will be sent a copy of the public hearing notice at least 30 days in advance of the hearing date.

Thanks,

Stuart Siffring, P.E.
Tribal Air Permitting
US EPA Region 8 Air Program
Phone: (303) 312-6478
Fax: (303) 312-6064
https://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region

Siffring, Stuart

From: Kubler, Charley <Charley.Kubler@chsinc.com>
Sent: Friday, March 10, 2017 1:33 PM
To: Siffring, Stuart
Cc: CO-Circle, Mark Dreesen; CO-Wolf Point, Brandon Holmes; CO-Wolf Point, Jeffrey Schaefer; Gales, Jim; Mutschler, Pete; Pearson, Chad; Mcgrath, Stephanie; Duffy, Brian
Subject: FW: CHS Farmers Elevator - Macon discussion follow up
Attachments: removed.txt; CHS Macon - Potential to Emit Emissions Calculations Fugitves from Haul Road at 30mph 170310.xlsx; CHS Macon - Potential to Emit Emissions Calculations Grain Elevator 170310.xlsx

Good afternoon Stuart,
Thanks again for the opportunity to make this last set of comments regarding EPA's draft air permit for CHS' Macon grain handling facility. As requested, the PTE calculations in the attached worksheets have been revised in accordance with our recent conversations, and the emails below, to reflect CHS' requested permit application changes (allowable increases) in the following areas:

- Haul roads (truck traffic from 18,000 to 20,000 truck trips);
- Annual truck shipment of screenings/and some grain (from 180,000 to 360,000 bushels); and,
- Facility Truck receiving area (grain received by straight trucks from 900,000 to 1,800,000 bushels).

Also, the following comments related to draft permit language are presented for consideration by EPA – Region 8:

1. Under Monitoring Requirements in the proposed permit, please consider substituting the proposed requirement for using EPA Methods 22 and 9 with the following requirement: *"The permittee shall maintain a measuring device for monitoring and/or measurement of pressure drop across the baghouse system, with an operating range between 0.2 to 8 inches (water gauge). The permittee shall keep records of weekly pressure drop measurements for any week the bag house is operated."*

2. Maximum Permitted Throughput - Truck Receiving Area – Straight Truck: please consider increasing the maximum permitted throughput for grain delivered by straight trucks from 900,000 bushels per year to 1,800,000 bushels per year (i.e., grain received annually by straight truck would then be allowed to represent up to 10% of the total permitted grain received), with a provision that the total volume of grain received by hopper truck per year would be reduced by a corresponding amount, such that the maximum facility limit of 1,800,000 bushels per year would not be exceeded. *The updated emissions calculations in the attached spreadsheet for facility PTE already reflect this requested change.*

3. Maximum Permitted Throughput - Truck Traffic: please consider increasing the number of vehicle trips allowed per year from 18,000 trips to 20,000 trips. This change reflects the number of truck trips required to deliver 18,000,000 bushels of grain from the field to the grain elevator, using an average volume capacity of approximately 900 bushels per truck instead of 1,000 bushels per truck. A number of grain trucks in this region have capacities smaller than 1,000 bushels. We further request that this limit be based upon a 12-month rolling average. *The updated emissions calculations in the attached spreadsheets already reflect this requested change.*

4. Maximum Permitted Throughput – Truck Shipping: please consider increasing the maximum permitted annual throughput for shipping grain by truck from 180,000 bushels to 360,000 bushels, with a provision that the volume of grain shipped per year by rail would be reduced by a corresponding amount, such that the maximum allowable annual volume of grain shipped would not be exceeded. This is requested to account for the shipment by truck of screenings (grain byproducts) and some grain for alternative end-use or disposal. *The updated emissions calculations in the attached spreadsheet for facility PTE already reflect this requested change.*

Thanks again. Please call with any questions or comments.

Sincerely,
charley

Charley Kubler, CHMM
Environment Manager
EHS Systems Manager
Country Operations Division
(952) 334-0024


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CHS, Inc.
Mail Station 305
5500 Cenex Drive
Inver Grove Heights, MN 55077-1733

From: Siffring, Stuart [mailto:Siffring.Stuart@epa.gov]
Sent: Tuesday, February 28, 2017 10:27 AM
To: Kubler, Charley <Charley.Kubler@chsinc.com>
Cc: Duffy, Brian <Brian.Duffy@chsinc.com>; Mcgrath, Stephanie <Stephanie.Mcgrath@chsinc.com>
Subject: RE: CHS Farmers Elevator - Macon discussion follow up

Hi Charley,

Thanks for the questions, they all seem like reasonable requests that I am happy to incorporate into the permit. I would appreciate getting updated PTE calculations from you as soon as you are able, to ensure the permit accurately reflects the estimated emissions from the facility. I have included my answers below in red.

Feel free to contact me to discuss this further if needed. Thanks again,

-Stuart

Stuart Siffring
Environmental Engineer
US EPA Region 8 Air Program
Phone: (303) 312-6478
Fax: (303) 312-6064
https://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region

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From: Kubler, Charley [mailto:Charley.Kubler@chsinc.com]
Sent: Thursday, February 23, 2017 1:48 PM
To: Siffring, Stuart <Siffring.Stuart@epa.gov>
Cc: Duffy, Brian <Brian.Duffy@chsinc.com>; Mcgrath, Stephanie <Stephanie.Mcgrath@chsinc.com>
Subject: RE: CHS Farmers Elevator - Macon discussion follow up

Stuart,

Thanks for providing CHS the opportunity to make final comments on the draft permit for our Macon Junction grain elevator. We have comments on four topics, which are elaborated below:

- All-Inclusive AP-42 Emission Factor: Is our understanding correct? *Yes, that is how I understand the use of the emission factors in this section of AP-42. If that changes your facility's PTE, please send updated calculations as soon as you are able.*
- Monitoring Requirements: May we monitor baghouse pressure drop instead of opacity? *Yes I think that would be just as enforceable as an opacity limit. I would need some exact numbers of pressure drop limits that would require corrective action to include in the permit. (4.00"w.c. or similar?)*
- Maximum Permitted Throughput - Truck Traffic: May we increase allowable receiving truck traffic to better align with allowable grain throughput? *Yes as long as the facility PTE is updated to reflect that increase.*
- Maximum Permitted Throughput - Truck Receiving Area – Straight Truck: May we increase the allowable portion of total truck traffic represented by straight trucks? *Yes, just update calcs.*

All-Inclusive AP-42 Emission Factor

Pursuant to your recent email regarding the "all -inclusive" nature of the respective emission factors found in AP-42 , *Chapter 9.9.1 – Grain Elevators and Processes*, we now understand that the AP-42 emission factor is only applied once to the volume of grain received at the facility, regardless of whether any of the grain received at the facility is moved to/from its storage bin more than once prior to shipment off-site (for example, recirculated to a cleaning process after initial storage and then returned to the bin).

Also, pursuant to the "all-inclusive" nature of the grain elevator emission factors, and using *Example 1 (page 20; AP-42, Chapter 9.9.1.3(5)),* it is our understanding that *total grain handling activity* for the Macon grain facility would consist of the amount of grain received, shipped and cleaned (i.e., three separate grain handling activities requiring elevation). At a maximum, this would be 18,000,000 bushels received annually at our Macon facility, plus 18,000,000 bushels cleaned and 18,000,000 bushels shipped, for a facility total of 54,000,000 bushels handled, even though during the grain cleaning process some of the grain could be elevated from a storage bin to a cleaning bin more than once.

Please advise if our understanding of calculating emissions from these grain activities is correct. We want to make sure that CHS is accurately calculating the PM emissions from the grain handling facility.

Monitoring Requirements

Please consider substituting the proposed requirement for using EPA Method 22 and 9 with the following requirement:

> *The permittee shall maintain a measuring device for monitoring and/or measurement of pressure drop across the baghouse system. In addition, the permittee shall keep records of weekly pressure drop measurements for any week in which the bag house is operated.*

Maximum Permitted Throughput - Truck Traffic

We wish to request an increase in the vehicle trips allowed per year from 18,000 trips to 20,000 trips. This change reflects the number of truck trips required to deliver 18,000,000 bushels of grain from the field to the grain elevator using an average volume capacity of approximately 900 bushels instead of 1,000 bushels per truck. A number of grain trucks have capacities smaller than 1,000 bushels. We are requesting that this limit be based upon a 12-month rolling average.

Maximum Permitted Throughput - Truck Receiving Area – Straight Truck

We are requesting an increase in the maximum permitted throughput for straight trucks to 1,800,000 bushels of grain per year from 900,000 bushels of grain per year (i.e., grain received annually by straight truck allowed to represent up to 10% of the total permitted grain received).

We appreciate your consideration of each of these comments. We'd be happy to speak with you directly about these, if that would be helpful. Please let us know your thoughts, and whether we might schedule a teleconference to discuss this further.

Sincerely,
charley

Charley Kubler, CHMM
Environment Manager
EHS Systems Manager
Country Operations Division
(952) 334-0024

Farmer-owned with global connections

CHS, Inc.
Mail Station 305
5500 Cenex Drive
Inver Grove Heights, MN 55077-1733

From: Siffring, Stuart [mailto:Siffring.Stuart@epa.gov]
Sent: Tuesday, February 21, 2017 9:07 AM
To: Kubler, Charley <Charley.Kubler@chsinc.com>
Cc: Duffy, Brian <Brian.Duffy@chsinc.com>; Mcgrath, Stephanie <Stephanie.Mcgrath@chsinc.com>
Subject: RE: CHS Farmers Elevator - Macon discussion follow up

Hi Charley,

Thanks for the update, I am happy to talk through any other edits you had in mind. Let me know when you are available to discuss them and I will make sure we have a permit that works for your operation. Thanks,

-Stuart

From: Kubler, Charley [mailto:Charley.Kubler@chsinc.com]
Sent: Thursday, February 16, 2017 8:30 AM
To: Siffring, Stuart <Siffring.Stuart@epa.gov>
Cc: Duffy, Brian <Brian.Duffy@chsinc.com>; Mcgrath, Stephanie <Stephanie.Mcgrath@chsinc.com>
Subject: Re: CHS Farmers Elevator - Macon discussion follow up

Stuart,
Thanks so much for keeping this moving forward. Our discussion with you led to further internal discussions at CHS, and there are two areas for which we are still exploring the possibility of requesting permit language edits:
1) maximum allowable throughput; and,
2) alternative method for monitoring PCE performance.
We plan to complete our review and consideration of these items within 2-4 more workdays. Could we plan on speaking with you on these two items in the next few days before publishing the proposed permit for public comment?

RSVP.
Thanks,
Charley
(952) 334-0024

On Feb 14, 2017, at 11:29 AM, Siffring, Stuart <Siffring.Stuart@epa.gov> wrote:

Hello,

I have gone through the meeting notes you prepared and have a few answers to share.

- All the performance testing required by the permit can be performed by CHS staff
- The AP-42 factors are “all-inclusive” and rely only on throughput
- The visual emission surveys are able to be done every month
- I also changed the description of the grain cleaning system and control efficiency requirements.

I am in the process of moving the permit through the channels here and should be in touch when the public comment period is beginning. Thanks again for the chance to talk this through!

-Stuart

Stuart Siffring
Environmental Engineer
US EPA Region 8 Air Program
Phone: (303) 312-6478
Fax: (303) 312-6064
https://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region

Air Emissions for Grain Elevators				**CHS Farmers Elevator - Macon, MT**							
Potential Emissions									Source unless otherwise noted: EPA AP-42 Chapter 9.9.1		
a			b	c	d	e	f	g	h	i	j
Activity			**Maximum Capacity**	**PM Control Efficiency[2]**	**PM Emission Factor**	**PM Emissions**	**PM 10 Control Efficiency[2]**	**PM10 Emission factor**	**PM10 Emissions**	**PM2.5 Emission factor**	**PM2.5 Emissions**
Each activity type (receiving, loadout, etc, except drying) must total the max capacity. If you use multiple methods within an activty, use the method with the higher emission factor for max capacity =			(tons/year)	(% control)	(lb/ton)	(tons/year)	(% control)	(lb/ton)	(ton/year)	(lb/ton)	(ton/year)
			540,000			b * d * (1-c) / 2000			b * f * (1-c) / 2000		
Receiving	Hopper truck	0.9	486,000	0%	0.035	8.51	0%	0.0078	1.90	0.0013	0.32
	Straight truck	0.1	54,000	0%	0.18	4.86	0%	0.059	1.59	0.01	0.27
	Rail			0%	0.032	0.00	0%	0.0078	0.00	0.0013	0.00
	Barge - continuous unloader			0%	0.029	0.00	0%	0.0073	0.00	0.0019	0.00
	Barge - marine leg			0%	0.15	0.00	0%	0.038	0.00	0.005	0.00
	Ships			0%	0.15	0.00	0%	0.038	0.00	0.005	0.00
Grain Loadout	Truck	0.02	10,800	0%	0.086	0.46	0%	0.029	0.16	0.0049	0.03
	Railcar	0.98	529,200	0%	0.027	7.14	0%	0.0022	0.58	0.00037	0.10
	Barge			0%	0.016	0.00	0%	0.004	0.00	0.00055	0.00
	Ship			0%	0.048	0.00	0%	0.012	0.00	0.0022	0.00
Headhouse and Grain Handling (legs, conveyors, belts, distributor, scale, enclosed cleaners, etc.)		3	1,620,000	0%	0.061	49.41	0%	0.034	27.54	0.0058	4.70
Grain Cleaning (internal vibrating[1])		1	540,000	0%	0.375	101.25	0%	0.095	25.65	0.016	4.32
Storage Bin (vent)		1	540,000	0%	0.025	6.75	0%	0.0063	1.70	0.0011	0.30
If the max capacity of your grain dryer is smaller than the max capacity of the elevator, you may use the max capacity of the dryer.											0.00
Grain Drying	Rack		0	0%	3	0.00	0%	0.75	0.00	0.13	0.00
	Rack - self-cleaning screen (<50mesh)		0	0%	0.47	0.00	0%	0.12	0.00	0.02	0.00
	Column		0	0%	0.22	0.00	0%	0.055	0.00	0.0094	0.00
Total Emissions						**178.38**			**59.12**		**10.03**

Estimated Fugitive Particulate Emissions fron Haul Roads - Based on 18,000,000 Bushels per Year

Throughput (max capacity) =	540,000	tons/year
Throughput (actual) =		tons/year
Throughput (actual hauled) =		tons/year

Unpaved road Source: AP-42 13.2.2 (11/2006)

k = PM particle size multiplier	4.9				
k_{10} = PM_{10} particle size multiplier	1.5				
$k_{2.5}$ = $PM_{2.5}$ particle size multiplier	0.15				
s = silt content of road (%)	6		**Vehicle 1**	**Vehicle 2**	
W = mean vehicle weight (ton)	27.0		100%		**% of total trips**
$V_{potential}$ = # vehicle trips / yr	20,000		15		**Empty weight (tons)**
V_{actual} = # vehicle trips / yr			42		**Full weight (tons)**
M = miles of unpaved roads	0.52				
Potential Vehicle Miles Traveled (VMT) = $V_{potential}$ x M		10400			
Actual Vehicle Miles Traveled (VMT) = V_{actual} x M		0			
PM emission factor (lb/VMT) = $k(s / 12)^{0.7} (W / 3)^{0.45}$		8.11			
PM_{10} emission factor (lb/VMT) = $k(s / 12)^{0.9} (W / 3)^{0.45}$		2.16			
PM_{10} emission factor (lb/VMT) = $k(s / 12)^{0.9} (W / 3)^{0.45}$		0.22			

Note: these emission factors are based upon a formula speed of 30 miles per hour. Actual average on-site speed is less than 15 mph.

Totals

a	b	c	d	e	f
Source	**Emission Factor**	**Potential Activity**	**Potential Emissions** b * c / 2000	**Actual Activity**	**Actual Emissions** b * e / 2000
Unpaved road	(lb/VMT)	(Vehicle miles traveled)	(ton/year)	(Vehicle miles traveled)	(ton/year)
PM	8.11	10400	42.16	0	0.00
PM10	2.16	10400	11.24	0	0.00
PM2.5	0.22	10400	1.12	0	0.00
Material handling	(lb/ton)	(tons)		(tons)	
PM	0.00		0.00		0.00
PM10	0.00		0.00		0.00
Ground pile	(lb/d*acre)	(d*acre)		(d*acre)	
PM	0.00	0	0.00	0.00	0.00
PM10	0.00	0	0.00	0.00	0.00
Total					
PM			**42.16**		**0.00**
PM10			**11.24**		**0.00**
PM2.5			**1.12**		**0.00**

Siffring, Stuart

From: Siffring, Stuart
Sent: Monday, February 06, 2017 12:21 PM
To: Kubler, Charley
Cc: Brian.Duffy@chsinc.com
Subject: CHS Farmers Elevator - Macon permit language and issuance
Attachments: CHS language comparison.docx

Hi Charley,

I am contacting you to discuss the CHS Farmers Elevator – Macon permit and to inform you of the need for an additional public comment period due to changes in certain permit conditions.

After making your requested changes to throughput limits and in preparation for final issuance, my supervisor brought up some concerns with enforceability of the emission limits and suggested a change to an opacity limit instead. This being one of our first True Minor NSR construction permits put it under an extra amount of scrutiny and, in an abundance of caution, it was decided that the new language should be put out for public comment.

I am sure you are anxious to receive the final permit, and am more than happy to talk through the language changes with you before the start of the public comment period in order to issue this as soon as possible. If no public comments are received it shaves 30 days off from the permit's effective date.

Thanks for the understanding, and I look forward to hearing from you.

-Stuart

Stuart Siffring
Environmental Engineer
US EPA Region 8 Air Program
Phone: (303) 312-6478
Fax: (303) 312-6064
https://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region

Public Notice: Request For Comments

Proposed Air Quality Permit to Construct
CHS Inc.
Farmers Elevator - Macon

Notice issued: April 14, 2016

Written comments due:
5 p.m., May 16, 2016

Where is the proposed facility location?
Fort Peck Indian Reservation
CHS Inc.
Farmers Elevator - Macon
6134 Hwy 13
Wolf Point, MT 59201
Latitude 48.10972N
Longitude 105.51833W

What is being proposed?
This permit action will apply to an existing facility operating on the Fort Peck Indian Reservation in Montana.

The facility is designed to store, clean, and transfer grain from local farms and is also known as a country grain elevator.

This MNSR permit action allows construction of an expansion to the existing grain elevator facility.

Proposed Permit Requirements:
CHS has requested that emission limits on the elevator legs, truck unloading pit, and grain cleaning area be put in place to reduce emissions of particulate matter (PM, PM_{10}, and $PM_{2.5}$).

What are the effects on air quality?
The impacts to local air quality from the proposed project are not expected to be significant and should not have an adverse impact on attainment of the NAAQS or cause or contribute to PSD increment violation.

Where can I send comments?
EPA accepts comments by mail, fax and e-mail.

US EPA Region 8 Air Program, 8P-AR
Attn: Federal Minor NSR Coordinator
1595 Wynkoop Street,
Denver, CO 80202
R8AirPermitting@epa.gov
Fax: 303-312-6064

How can I review documents?
You can review an electronic copy of the proposed permits and related documents at the following locations:

Assiniboine and Sioux Tribes
Environmental Programs Office
P.O. Box 1027
Poplar, Montana 59255-1027
Attn: Deb Madison, Environmental Programs Director
(406) 768-2300

and

US EPA Region 8 Office:
1595 Wynkoop Street, Denver, CO 80202
(Please call Stuart Siffring at 303-312-6478 in advance of your visit.)

US EPA Region 8 Website:
https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8-region-8

Permit number:
CHS Inc. Farmers Elevator - Macon
TMNSR-FP-000010-2015.001

What happens next?
EPA will review and consider all comments received during the comment period. Following this review, the EPA may issue the permit as proposed, issue a modified permit based on comments, or deny the permit

Tribal Minor New Source Review in Indian Country

United States Environmental Protection Agency

Region 8
Air Program
1595 Wynkoop Street
Denver, CO 80202
Phone 800-227-8917

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

Ref: 8P-AR

Mr. Charley Kubler
Division Environmental Manager
CHS, Inc.
5500 Cenex Drive
Inver Grove Heights, MN 55077-1721

Re: CHS Inc., Farmers Elevator - Macon
Permit # TMNSR-FP-000010-2015.001, Proposed Minor New Source Review Permit

Dear Mr. Kubler:

The U.S. Environmental Protection Agency Region 8 has completed its review of CHS Inc.'s application requesting a minor new source review permit pursuant to the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR Part 49 for the Farmers Elevator – Macon facility, located on the Fort Peck Indian Reservation in Montana.

Enclosed are the proposed permit and the corresponding technical support document. The regulations at 40 CFR 49.157 require that the affected community and the general public have the opportunity to submit written comments on any proposed MNSR permit. All written comments submitted within 30 calendar days after the public notice is published will be considered by the EPA in making its final permit decision. Enclosed is a copy of the public notice which will be published on the EPA's website located at: https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8, on Thursday, April 14, 2016. The public comment period will end at 5:00 p.m. on Monday, May 16, 2016.

The conditions contained in the proposed permit will become effective and enforceable by the EPA if the permit is issued final. If you are unable to accept any term or condition of the draft permit, please submit your written comments, along with the reason(s) for non-acceptance to:

Tribal NSR Permit Contact
c/o Air Program (8P-AR)
U.S. EPA, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

or

R8AirPermitting@epa.gov

If you have any questions concerning the enclosed proposed permit or technical support document, please contact Stuart Siffring of my staff at (303) 312-6478.

Sincerely,

Carl Daly, Director
Air Program

Enclosures (2)

cc: Deb Madison, Fort Peck Tribes Office of Environmental Protection
Brian Duffy, Senior Environmental Professional, CHS Inc.
James Hardy, Manager, CHS Inc.

United States Environmental Protection Agency
Region 8 Air Program
1595 Wynkoop Street
Denver, CO 80202

Air Pollution Control
Minor Source Permit to Construct

40 CFR 49.151

 # TMNSR-FP-000010-2015.001

Permit to construct to establish legally and practically enforceable limitations and requirements for emissions sources at a new facility

Permittee:

CHS, Inc.

Permitted Facility:

Farmers Elevator - Macon
Fort Peck Indian Reservation
Roosevelt County, Montana

Summary

On July 29, 2015, the EPA received an application from CHS Inc. (CHS) requesting a permit for a true minor new source of air pollutant emissions in accordance with the requirements of the Federal Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR Part 49.

Through this permit action, the EPA is approving construction of a modification of an existing country grain elevator on Indian country lands within the Fort Peck Indian Reservation in Roosevelt County, Montana. The proposed modification is estimated to be a true minor source of criteria pollutants with respect to the MNSR Permit Program.

This permit contains production limits, emission control requirements, and associated monitoring, recordkeeping, and reporting requirements, for the modification project and/or certain pollutant emission-generating units or activities that are existing and approved for construction and installation.

The EPA determined that this approval will not contribute to violations of the National Ambient Air Quality Standards (NAAQS), or have potentially adverse effects on ambient air.

Table of Contents

I. Conditional Permit to Construct

A. General Information

Facility:	Farmers Elevator - Macon
Permit number:	TMNSR-FP-000010-2015.001
SIC Code and SIC Description:	5153 – Grain and Field Beans

Site Location:
Farmers Elevator - Macon
6134 Hwy 13, Wolf Point, MT 59201
SENE ¼ Sec 9, T27N, R48E
Latitude 48.10972N, Longitude 105.51833W
Fort Peck Indian Reservation
Roosevelt County, Montana

Corporate Office Location:
CHS, Inc
5500 Cenex Drive
Inver Grove Heights, MN 55077-1721

The equipment listed in this permit may only be operated by CHS, Inc. (CHS) at the location described above.

B. Applicability

1. This Conditional Permit to Construct is being issued under authority of the MNSR Permit Program at 40 CFR Part 49.

2. Any conditions for this facility or any specific pollutant emission-generating units or activities at this facility established pursuant to any permit to construct issued under the authority of the Prevention of Significant Deterioration Permit Program at 40 CFR Part 52 (PSD) or the MNSR Permit Program shall continue to apply.

3. By issuing this permit, the EPA does not assume any risk of loss which may occur as a result of the operation of the permitted facility by the Permittee, Owner, and/or Operator, if the conditions of this permit are not met by the Permittee, Owner, and/or Operator.

C. Construction and Operational Requirements

1. The Permittee is approved to install and operate the emissions-generating units or activities identified in Table 1, at up to the maximum permitted throughput (if listed).

Table 1. Approved Emissions Units and/or Activities and Maximum Permitted Throughput

Emission Unit/Activity Description	Maximum Permitted Throughput
Truck Receiving Area – Hopper truck	17,640,000 bushels of grain per year
Truck Receiving Area – Straight truck	360,000 bushels of grain per year
Grain Loadout Area - Truck	90,000 bushels of grain per year
Grain Loadout Area – Railcar	17,910,000 bushels of grain per year
Grain Handling	38,700,000 bushels of grain per year
Grain Cleaning	18,000,000 bushels of grain per year
Storage Bin venting	18,000,000 bushels of grain per year
Truck Traffic	15,429 vehicle trips per year

2. The Permittee shall maintain and operate each approved emission unit or activity, including any associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions of MNSR regulated pollutants and considering the manufacturer's recommended operating procedures at all times, including periods of startup, shutdown, maintenance, and malfunction. The EPA will determine whether the Permittee is using acceptable operating and maintenance procedures based on information available, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the facility.

3. Only the emission units and activities that are operated and controlled as specified in this permit are approved for installation under this permit.

D. Grain Handling Emissions Control Requirements

1. Emissions from the facility shall not exceed;

   (a) 161.1 tons per year of particulate matter (PM)

   (b) 50.1 tons per year of particulate matter less than 10 microns in size (PM_{10})

   (c) 8.5 tons per year of particulate matter less than 2.5 microns in size ($PM_{2.5}$)

2. *Receiving Area, Elevator Legs, and Cleaning System Controls (Baghouses)* :

   (a) The Permittee shall install, operate, and maintain: Two (2) cartridge style baghouses to control particulate emissions from each elevator leg, Two (2) bag houses to control particulate emissions from each truck unloading pit, and One (1) bag house to control particulate emissions from the grain cleaning area.

   (b) Each baghouse shall meet a minimum control efficiency of 99% for PM, and 93% for PM_{10}.

E. Monitoring Requirements

1. *Baghouse Fabric and Cartridge Filter Inspections*: At least once per calendar month in which the permitted source operates, beginning with the first calendar month of operation after the effective date of this permit, the Permittee shall inspect the interior and exterior of each fabric cartridge/filter on each baghouse for evidence of leaking, damaged and/or missing filters, and take appropriate corrective actions to restore filters to proper operation before resuming normal operations.

F. Recordkeeping Requirements

1. The Permittee shall maintain the permit application and all documentation supporting that application, including manufacturer or vendor specifications, for the duration of time that the affected emissions unit(s) is covered under this permit.

2. The Permittee shall retain all records required by this permit for a period of at least 5 years from the date the record was created.

3. Records shall be kept at the facility or the location that has day-to-day operational control over the facility.

4. The Permittee shall maintain records of the following:

   (a) The amounts of grain loaded in and out of the facility (bushels) each month and consecutive 12-month periods;

   (b) Daily hours of operation of the facility;

   (c) The dates and results of each cartridge/filter inspection performed pursuant to Condition E.1 of this permit. At a minimum, records shall include:

      (i) The name of the person, company or entity conducting the survey;
      (ii) Whether visible emissions were detected from any affected emissions unit;
      (iii) Any corrective action taken; and
      (iv) The result of the corrective action.

G. Notification and Reporting Requirements

1. *Notification of construction or modification, and operations*: The Permittee shall submit to the EPA a written or electronic notice within 30 days from when the Permittee begins actual construction of the new emissions units and/or activities approved for installation under this permit, and when the Permittee begins operations of new emissions units or activities or resumes operation of existing emissions units and/or activities.

2. *Annual Reports*

   (a) The Permittee shall submit to the EPA an annual report no later than April 1 of each calendar year. The annual report shall cover the period from January 1 to December 31 of the previous calendar year. All reports shall be certified to truth and accuracy by the person primarily responsible for Clean Air Act compliance for the Permittee.

   (b) The report shall include:

      (i) An evaluation of the permitted source's compliance status with the requirements in this permit;
      (ii) Summaries of the required monitoring and recordkeeping in this permit; and
      (iii) Summaries of deviation reports submitted pursuant to this permit.

3. *Notification of Change in Ownership or Operator*: If the permitted source changes ownership or operator, then the Permittee shall submit to the EPA a written or electronic notice within 90 days before or after the change in ownership or operator is effective. In the report, the Permittee shall provide the reviewing authority a written agreement containing a specific date for the transfer of ownership or operator, and an effective date on which the new owner or operator assumes partial and/or full coverage and liability under this permit. The submittal shall identify the previous owner or operator, and update the name, street address, mailing address, contact information, and any other information about the permitted source if it would change as a result of the change of ownership or operator. The Permittee shall ensure that the permitted source remains in compliance with this permit during any such transfer of ownership.

4. *Notification of closure*: The Permittee shall submit to the EPA a report of any permanent or indefinite closure in writing within 90 days after the cessation of all operations at the permitted source. The notification shall identify the owner, the current location, and the last operating location of the permitted source. It is not necessary to submit a report of closure for regular seasonal closures.

[Note: to help meet notification requirements, the EPA has developed forms "OWN" (for notifications of change in ownership) and "CLOSURE" (for notifications of facility closure). The forms may be found on the EPA's website at: http://www2.epa.gov/region8/tribal-minor-new-source-review-permitting.]

5. Any documents required to be submitted under this permit, shall be submitted to:

U.S. Environmental Protection Agency, Region 8
Office of Enforcement, Compliance & Environmental Justice
Air Toxics and Technical Enforcement Program, 8ENF-AT
1595 Wynkoop Street
Denver, Colorado 80202

Documents may be submitted electronically to R8AirReportEnforcement@epa.gov.

6. *Deviation Reports*: The Permittee shall promptly submit to the EPA a written report of any deviations of permit requirements, including deviations attributable to upset conditions.

(a) The deviation report shall include: the identity of the affected emissions unit or activity where the deviation occurred; the nature, duration, and probable cause of the deviation; and any corrective actions or preventative measures taken to minimize emissions from the deviation and to prevent future deviations.

(b) A "prompt" deviation report is one that is post marked or submitted via electronic mail to R8AirReportEnforcement@epa.gov as follows:

(i) Within 72 hours of the discovery of deviations from any control efficiency in this permit; and
(ii) By April 1 for the discovery of a deviation of recordkeeping or other permit conditions during the preceding calendar year that do not affect the Permittee's ability to meet the emissions limitations in this permit.

7. The Permittee shall submit a report for any required performance test to the EPA within 60 days after completing the tests, in accordance with the performance test recordkeeping requirements in this permit.

8. The Permittee shall submit any record or report required by this permit upon EPA request.

II. General Provisions

A. Conditional Approval:

Pursuant to the authority of 40 CFR 49.151, the EPA hereby conditionally grants this permit to construct. This authorization is expressly conditioned as follows:

1. *Document Retention and Availability:* This permit and any required attachments shall be retained and made available for inspection upon request at the location set forth herein.

2. *Permit Application:* The Permittee shall abide by all representations, statements of intent and agreements contained in the application submitted by the Permittee. The EPA shall be notified 10 days in advance of any significant deviation from this permit application as well as any plans, specifications or supporting data furnished.

3. *Permit Deviations:* The issuance of this permit may be suspended or revoked if the EPA determines that a significant deviation from the permit application, specifications, and supporting data furnished has been or is to be made. If the proposed source is constructed, operated, or modified not in accordance with the terms of this permit, the Permittee will be subject to appropriate enforcement action.

4. *Compliance with Permit:* The Permittee shall comply with all conditions of this permit, including emission limitations that apply to the affected emissions units at the permitted facility/source. Noncompliance with any permit term or condition is a violation of this permit and may constitute a violation of the Clean Air Act and is grounds for enforcement action and for a permit termination or revocation.

5. *Fugitive Emissions:* The Permittee shall take all reasonable precautions to prevent and/or minimize fugitive emissions during the construction period.

6. *NAAQS and PSD Increment:* The permitted source shall not cause or contribute to a National Ambient Air Quality Standard violation or a PSD Increment violation.

7. *Compliance with Federal and Tribal Rules, Regulations, and Orders:* Issuance of this permit does not relieve the Permittee of the responsibility to comply fully with all other applicable federal and tribal rules, regulations, and orders now or hereafter in effect.

8. *Enforcement:* It is not a defense, for the Permittee, in an enforcement action, to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

9. *Modifications of Existing Emissions Units/Limits:* For proposed modifications, as defined at 40 CFR 49.152(d), that would increase an emissions unit allowable emissions of pollutants above its existing permitted annual allowable emissions limit, the Permittee shall first obtain a permit modification pursuant to the MNSR regulations approving the increase. For a proposed modification that is not otherwise subject to review under the PSD or MNSR regulations, such proposed increase in the annual allowable emissions limit shall be approved through an administrative permit revision as provided at 40 CFR 49.159(f).

10. *Relaxation of Legally and Practically Enforceable Limits:* At such time that a new or modified source within this permitted facility/source or modification of this permitted facility/source becomes a major stationary source or major modification solely by virtue of a relaxation in any legally and practically enforceable limitation which was established after August 7, 1980, on the capacity of the permitted facility/source to otherwise emit a pollutant, such as a restriction on hours of operation, then the requirements of the PSD regulations shall apply to the source or modification as though construction had not yet commenced on the source or modification.

11. *Revise, Reopen, Revoke and Reissue, or Terminate for Cause:* This permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee, for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. The EPA may reopen this permit for a cause on its own initiative, e.g., if this permit contains a material mistake or the Permittee fails to assure compliance with the applicable requirements.

12. *Severability Clause:* The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

13. *Property Rights:* This permit does not convey any property rights of any sort or any exclusive privilege.

14. *Information Requests:* The Permittee shall furnish to the EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating this permit or to determine compliance with this permit. For any such information claimed to be confidential, you shall also submit a claim of confidentiality in accordance with 40 CFR Part 2, Subpart B.

15. *Inspection and Entry:* The EPA or its authorized representatives may inspect this permitted facility/source during normal business hours for the purpose of ascertaining compliance with all conditions of this permit. Upon presentation of proper credentials, the Permittee shall allow the EPA or its authorized representative to:

    (a) Enter upon the premises where this permitted facility/source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of this permit;

    (b) Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of this permit;

    (c) Inspect, during normal business hours or while this permitted facility/source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

    (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements; and

    (e) Record any inspection by use of written, electronic, magnetic and photographic media.

16. *Permit Effective Date:* This permit is effective immediately upon issuance unless comments resulted in a change in the proposed permit, in which case the permit is effective 30 days after issuance. The Permittee may notify the EPA, in writing, that this permit or a term or condition of it is rejected. Such notice should be made within 30 days of receipt of this permit and should include the reason or reasons for rejection.

17. *Permit Transfers:* Permit transfers shall be made in accordance with 40 CFR 49.159(f). The Air Program Director shall be notified in writing at the address shown below if the company is sold

or changes its name.

U.S. Environmental Protection Agency, Region 8
Office of Partnerships and Regulatory Assistance
Tribal Air Permitting Program, 8P-AR
1595 Wynkoop Street
Denver, Colorado 80202

18. *Invalidation of Permit:* This permit becomes invalid if construction is not commenced within 18 months after the effective date of this permit, construction is discontinued for 18 months or more, or construction is not completed within a reasonable time. The EPA may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between the construction of the approved phases of a phased construction project. The Permittee shall commence construction of each such phase within 18 months of the projected and approved commencement date.

19. *Notification of Start-Up:* The Permittee shall submit a notification of the anticipated date of initial start-up of this permitted source to the EPA within 60 days of such date, unless this permitted source is an existing source.

B. Authorization:

Authorized by the United States Environmental Protection Agency, Region 8

_____

Carl Daly, Director — Date
Air Program

United States Environmental Protection Agency
Region 8 Air Program
Air Pollution Control Minor Source Permit to Construct
Technical Support Document for
Proposed Permit No. TMNSR-FP-000010-2015.001

CHS Inc.
Farmers Elevator
Fort Peck Indian Reservation
Roosevelt County, Montana

In accordance with the requirements of the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR Part 49, this federal permit to construct is being issued under authority of the Clean Air Act (CAA). The EPA has prepared this technical support document describing the conditions of this permit and is presenting information that is germane to this permit action.

Table of Contents

I. Introduction

On July 29, 2015, the EPA received an application from CHS Inc. (CHS) requesting a permit for a true minor new source of air pollutant emissions in accordance with the requirements of the MNSR Permit Program.

Through this permit action, the EPA is proposing to approve construction of a modification to an existing country[1] grain elevator on Indian country lands within the Fort Peck Indian Reservation in Roosevelt County, Montana. The proposed modification is estimated to be a true minor new source of criteria pollutants with respect to the MNSR Permit Program.

This proposed permit contains production limits, emission control requirements, and associated monitoring, recordkeeping, and reporting requirements, for the modification project and/or certain pollutant emission-generating units or activities approved for construction and installation.

II. Facility Description

The CHS Farmers Elevator is located on Indian country lands within the Fort Peck Indian Reservation in the SENE ¼ of Section 9, Township 27 North, Range 48 East, Roosevelt County, Montana, at latitude 48.10972N and longitude 105.51833W.

This enclosed grain handling and storage facility, with an existing permanent storage capacity of 996,000 bushels, currently receives, cleans and stores various grains from local farmers for storage until shipment to a variety of markets via rail car. Area grain is hauled to the facility from local farmers via hopper trucks (approximately 98%) and straight trucks (approximately 2%) and routed to the receiving area of the grain elevator, where grain is gravity fed into a receiving pit for placement into storage. Grain is transferred through the grain elevator from the receiving pit(s) to storage bins by means of various conveyors and elevator legs, typical of country grain elevators across the United States.

When ready for shipment, the shipping conveyors and elevator legs distribute grain to the bulk weighing system prior to load-out into railcars. A very small portion (less than 1%) of grain products is transported via hopper truck for transfer to other CHS Inc. operations. The grain received at the elevator is cleaned by moving over a grate at the same time it is being physically transferred from the receiving area and placed into the storage bins. A minor portion of grain is cleaned as a separate operation due to limited storage. The existing receiving pit, the elevator legs and the cleaning system are, and will continue to be, equipped with a total of three cyclone systems for the control of particulate matter (PM, PM_{10} and $PM_{2.5}$).

The facility does not currently combust either natural gas, propane or fuel oil for either grain drying or convenience heating purposes. There are no temporary grain storage areas (i.e. outside bunkers) onsite. Fumigation is not performed at the elevator.

CHS Farmers Elevator is proposing to expand the overall receiving, storing, cleaning and shipping capacities of the existing facility. This expansion would include: two additional truck receiving pits with baghouses for control of particulate matter; 14 additional silos and bins that would increase the

[1] A country grain elevator is defined as a facility that receives more than 50 percent of its grain from farmers in the immediate vicinity during the harvest season.

permanent storage capacity for the facility to approximately 1.92 million bushels; a new railcar receiving hopper (pit); a new grain moving and handling system; an additional cleaning system with a baghouse for control of particulate matter; additional grain load-out capacity for railcars, and associated conveyors and elevator legs with baghouses for control of particulate matter. With the expansion the maximum throughput capacity of the facility is estimated at around 15,000,000 or more bushels per year.

Table 1, Existing and Proposed Emissions Units and/or Activities and Maximum Operational Design, shows the emission-generating units and activities that are currently installed and operating at the existing facility, as well as those that are proposed to be approved for installation and operation at the existing facility. Table 2, Estimated Facility-Wide Emissions provides an accounting of uncontrolled and controlled emissions in tons per year (tpy) for the current and proposed configuration of the existing facility.

Table 1 – Existing and Proposed Approved Emissions Units and/or Activities and Maximum Operational Design

Description	**Maximum Operational Design**	**Maximum for PTE calculations (1.2xMax)**
Existing Emission Units/Activities (Maximum of last 5 years)		
Truck Receiving Area – Hopper truck	12,093,000 bushels of grain per year	14,511,606 bushels of grain per year
Truck Receiving Area – Straight truck	246,805 bushels of grain per year	296,166 bushels of grain per year
Grain Loadout Area - Truck	61,694 bushels of grain per year	74,033 bushels of grain per year
Grain Loadout Area – Railcar	12,278,111 bushels of grain per year	14,733,739 bushels of grain per year
Grain Handling	26,530,582 bushels of grain per year	31,834,713 bushels of grain per year
Grain Cleaning	12,339,805 bushels of grain per year	14,807,773 bushels of grain per year
Storage Bin venting	12,339,805 bushels of grain per year	14,807,773 bushels of grain per year
Truck Traffic	10,577 vehicle trips per year	12,692 vehicle trips per year
New Proposed Emission Units/Activities with expansion		
Truck Receiving Area – Hopper truck	14,700,000 bushels of grain per year	17,640,000 bushels of grain per year
Truck Receiving Area – Straight truck	300,000 bushels of grain per year	360,000 bushels of grain per year
Grain Loadout Area - Truck	75,000 bushels of grain per year	90,000 bushels of grain per year
Grain Loadout Area – Railcar	14,925,000 bushels of grain per year	17,910,000 bushels of grain per year
Grain Handling	32,250,000 bushels of grain per year	38,700,000 bushels of grain per year
Grain Cleaning	15,000,000 bushels of grain per year	18,000,000 bushels of grain per year
Storage Bin venting	15,000,000 bushels of grain per year	18,000,000 bushels of grain per year
Truck Traffic	12,857 vehicle trips per year	15,429 vehicle trips per year

Table 2 – Estimated Facility-Wide Emissions

Pollutant	Current Allowable Emissions (tpy)*	Post-Change Potential Emissions (tpy)*	Proposed Allowable Emissions (tpy)*	Proposed Change in Allowable Emissions (tpy)
PM	132.46	161.01	161.01	28.55
PM_{10}	41.22	50.1	50.1	8.88
$PM_{2.5}$	6.98	8.49	8.49	1.51
SO_2	NA	NA	NA	NA
NO_X	NA	NA	NA	NA
CO	NA	NA	NA	NA
VOC	NA	NA	NA	NA
Pb	NA	NA	NA	NA
Fluorides	NA	NA	NA	NA
H_2SO_4	NA	NA	NA	NA
H_2S	NA	NA	NA	NA
TRS	NA	NA	NA	NA
RSC	NA	NA	NA	NA
Greenhouse Gases				
CO_2e (Total)	NA	NA	NA	NA
Hazardous Air Pollutants (HAP)				
Formaldehyde	NA	NA	NA	NA
Benzene	NA	NA	NA	NA
Toluene	NA	NA	NA	NA
Ethylbenzene	NA	NA	NA	NA
Xylene	NA	NA	NA	NA
Total HAP's	**0**	**0**	**0**	**0**

PM - Particulate Matter
PM_{10} – Particulate Matter less than 10 microns in size
$PM_{2.5}$ – Particulate Matter less than 2.5 microns in size
SO_2 - Sulfur Dioxide
NO_X - Nitrogen Oxides
CO - Carbon Monoxide
VOC - Volatile Organic Compound
Pb - Lead and lead compounds
Fluorides - Gaseous and particulates
H_2SO_4 - Sulfuric Acid Mist
H_2S - Hydrogen Sulfide
TRS - Total Reduced Sulfur
RSC - Reduced Sulfur Compounds
CO_2e – Equivalent carbon dioxide (CO_2). A measure used to compare the emissions from various greenhouse gases based upon their global warming potential

* The current allowable emissions represent the current facility configuration and account for existing legally and practically enforceable restrictions. The post-change potential emissions include the potential uncontrolled emissions from the proposed modification project. The proposed allowable emissions represent the controlled emissions of the proposed modification project.

III. Proposed MNSR Permit Emission Limits and Controls

According to the requirements at 40 CFR 49.154(c), the EPA must determine the emission limitations required in a true minor source site-specific MNSR permit by conducting a case-by-case control technology review to determine the appropriate level of control, if any, to assure that the National Ambient Air Quality Standard (NAAQS) are achieved. In carrying out this case-by case control technology review, the EPA must consider the following factors: 1) local air quality conditions; 2) typical control technology or other emission reduction measures used by similar sources in surrounding areas; 3) anticipated economic growth; and 4) cost effective emission reduction alternatives. For this permit, the EPA considered regulations that apply to the equipment at grain elevator facilities. The Standards of Performance for Grain Handling Facilities at 40 CFR Part 60, Subpart A and DD contain requirements for what the EPA has determined is the best systems of emissions reductions (BSER) adequately demonstrated[2] for the relevant process equipment for certain new grain elevators and the associated cleaning and screening operations. We also reviewed other federal and state air pollution control permits for the sources to determine typical control requirements.

[2] BSER is determined in New Source Performance Standards by taking into account such factors as the cost, availability, level of use among existing sources, non-air quality health and environmental impact, energy requirements, amount of air pollution reduced, and technological innovation.

Based on our review of existing relevant regulations and existing federal and state permits for grain handling operations, especially similar grain elevator permits from Montana Department of Environmental Quality, we agree with CHS's proposal to install and operate the following control devices to complement the existing cyclone particulate control devices:

1. Two (2) new cartridge style bag houses to control particulate emissions from each new elevator leg;
2. Two (2) new bag houses to control particulate emissions from each new truck unloading pit; and
3. One (1) new bag house to control particulate emissions from the new cleaning area.

EPA guidance[3] suggests multiplying the maximum capacity of the facility by 1.2 to account for the possibility of record harvests. Therefore the emission and throughput limits are based a throughput of 18,000,000 bushels per year. The grain handling operation takes that limit and multiplies it by 2.15 to account for grain being moved around the facility multiple times before being loaded onto the train or truck.

We are proposing monitoring, recordkeeping, and reporting requirements to ensure compliance with the production limits, and emission control requirements, including:

1. Monthly fabric/cartridge filter inspections;
2. Records of the amounts of grain received and transferred (monthly and annual);
3. Records of grain production (daily, monthly, and annual);
4. Records of daily hours of operation for each controlled piece of equipment;
5. Notifications of beginning construction and operations;
6. Annual reports certifying compliance with the permit; and
7. Reports of permit deviations.

The proposed permit establishes emission control requirements that are consistent with what is required of country grain elevator operations across the country in attainment areas. As such, the proposed control technologies are considered widely available; and after considering anticipated economic growth in the area and more cost-effective alternatives, we determined that it was not necessary to make any additional changes to the proposal at this time.

IV. Air Quality Review

The Federal Minor New Source Review Regulations at 40 CFR 49.154(d) require that an Air Quality Impact Assessment (AQIA) modeling analysis be performed if there is reason to be concerned that new construction would cause or contribute to a NAAQS or Prevention of Significant Deterioration (PSD) increment violation. If an AQIA reveals that the proposed construction could cause or contribute to a NAAQS or PSD increment violation, such impacts must be addressed before a pre-construction permit can be issued.

The area surrounding the project area is currently considered to attain the NAAQS for all criteria pollutants. Data was collected and reviewed from the EPA's Air Quality Statistics (AQS) database for

3 Guidance on calculating PTE of Country Grain Elevators can be found at www.epa.gov/region07/air/title5/t5memos/grainfnl.pdf

air monitors in Roosevelt County for 2012-2014. These data confirmed that the air quality in Roosevelt County has not exceeded the NAAQS standards for criteria pollutants being emitted from this facility ($PM_{2.5}$ and PM_{10}) for the most recent available 3 years of data. The available data for pollutants is summarized in Table 3.

Table 3. 2012-2014 Air Quality Data for Roosevelt County

Site Name and AQS Number	NAAQS Pollutant & Standard Criteria	2012*	2013*	2014*	Current NAAQS Standard
Fort Peck 30-085-9000	$PM_{2.5}$ – 98th Percentile, 24-hr (µg/m^3)	13.6	16.8	16.8	35
Fort Peck 30-085-9000	$PM_{2.5}$ – Weighted Mean, annual (µg/m^3)	4.1	4.3	4.17	12
Fort Peck 30-085-9000	PM 10 - 98th Percentile, 24-hr (µg/m^3) Yearly max value	15.5	21.2	18.1	150 µg/m^3, not to be exceeded more than once per year

* The AQS database, located online at http://www.epa.gov/aqs, is updated by state, local, and tribal organizations who generate, review and submit the data. Compliance with the NAAQS is determined by comparison to a "design value" that is calculated based on a three-year average of the annual standard criteria values for each NAAQS pollutant. Regulatory design value data is available online at http://www3.epa.gov/airtrends/values.html.The values in this table represent data reported as accessed on March 10, 2016. Exceptional Events are excluded, which should not be used to determine background air quality or NAAQS compliance.

CHS Farmers Elevator - Macon Proposed Modification Characteristics and Estimated Emissions

The CHS Farmers Elevator is located at an elevation of 2,090 feet above mean sea level. The area immediately surrounding the site is predominately agricultural and rural in nature. The annual average precipitation for 2012-2014 was 13.13 inches, with the highest annual precipitation of 21.28 inches occurring in 2013. The average highest temperature during this timeframe was 92 degrees Fahrenheit, while the average lowest temperature was -17.2 degrees Fahrenheit. The highest temperatures were measured during the months of June, July, and August, while the lowest temperatures were measured in January and December.[4]

The CHS Farmers Elevator is an existing minor source for the purposes of the PSD Permit Program at 40 CFR Part 52. The proposed project is not a major modification, as defined under the PSD Permit Program, as the potential to emit all NSR-regulated pollutants for the project is less than 250 tpy and the proposed increase in allowable emissions for all NSR regulated pollutants for the project are less

[4] 2010-2014 data accessed from the National Centers for Environmental Information, National Oceanic and Atmospheric Administration, Climate Data Online website at http://www.ncdc.noaa.gov/cdo-web/, for the Ignacio 8E Station (Latitude: 37.086° N, Longitude: 107.533° W).

than the respective significant emission rates for major PSD sources at 40 CFR 52.21(b)(23)(i). The proposed project is estimated to result in an increase in allowable emissions of 28.55 tpy PM, 8.88 tpy PM_{10}, and 1.51 tpy $PM_{2.5}$ emissions. For PM, PM_{10}, and $PM_{2.5}$ the significant emission rates for existing major PSD sources is 25 tpy, 15 tpy, and 3 tpy respectively. Since the background concentration of PM_{10} and $PM_{2.5}$ in Roosevelt County is low in comparison to the NAAQS, a less than 9 tpy increase in PM_{10} emissions and a less than 2 tpy increase in $PM_{2.5}$ emissions is expected to have very little effect on localized NAAQS values, given that both are approximately half of the PSD significance thresholds for a major source. Therefore, the impacts to local air quality from the proposed project are not expected to be significant and should not have an adverse impact on attainment of the NAAQS or cause or contribute to PSD increment violation. We have determined that an AQIA modeling analysis is not required for this permit action.

V. Tribal Consultations and Communications

All minor source applications (synthetic minor, modification to an existing major source, new true minor or general permit) are submitted to both the Tribes and the EPA per the application instructions (see http://www.epa.gov/caa-permitting/tribal-nsr-permitting-region-8). The Tribes have 10 business days to respond to us with questions and comments on the application. In the event an AQIA is triggered, we email a copy of that document to the Tribes as soon as we receive it.

Additionally, we notify the Assiniboine and Sioux Indian Tribes of the public comment period for the draft permit and provide copies of the notice of public comment opportunity to post in various locations of their choosing on the Reservation. We also notify the Tribes of the issuance of the final permit.

VI. Environmental Justice

On February 11, 1994, the President issued Executive Order 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." The Executive Order calls on each federal agency to make environmental justice a part of its mission by "identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations."

The EPA defines "Environmental Justice" as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and polices. The EPA's goal with respect to Environmental Justice in permitting is to enable overburdened communities to have full and meaningful access to the permitting process and to develop permits that address environmental justice issues to the greatest extent practicable under existing environmental laws. *Overburdened* is used to describe the minority, low-income, tribal and indigenous populations or communities in the United States that potentially experience disproportionate environmental harms and risks as a result of greater vulnerability to environmental hazards.

This discussion describes our efforts to identify overburdened communities and assess potential effects in connection with issuing this permit in Roosevelt County on Indian country lands within the Fort Peck Indian Reservation.

A. Environmental Impacts to Potentially Overburdened Communities

This permit action authorizes the construction of new air emission sources at an existing facility with the potential to emit air pollutants at minor source levels under the MNSR Permit Program. The existing facility is located in a rural area primarily used for livestock grazing and other agricultural uses. The total net emissions increases for this project are below the major source PSD thresholds for all criteria pollutants. The ambient air measurements show existing air quality in the project area currently meets the NAAQS. The new emission sources would be controlled using baghouses with 96% - 99% particulate matter control efficiency. Therefore, the impacts to local air quality from the proposed project are not expected to be significant.

For purposes of Executive Order 12898 on environmental justice, the EPA has recognized that compliance with the NAAQS is "emblematic of achieving a level of public health protection that, based on the level of protection afforded by a primary NAAQS, demonstrates that minority or low-income populations will not experience disproportionately high and adverse human health or environmental effects due to the exposure to relevant criteria pollutants." (*In re Shell Gulf of Mexico, Inc. & Shell Offshore, Inc.*, 15 E.A.D., slip op. at 74 (EAB 2010)). This is because the NAAQS are health-based standards, designed to protect public health with an adequate margin of safety, including sensitive populations such as children, the elderly, and asthmatics.

Based on the findings described above, the EPA has concluded that issuance of the permit is not expected to have disproportionately high or adverse human health effects on overburdened communities in the vicinity of the facility on the Fort Peck Indian Reservation.

B. Enhanced Public Participation

Given the presence of potentially overburdened communities in the vicinity of the facility, we are providing an enhanced public participation process for this permit.

1. Interested parties can subscribe to an EPA listserve that notifies them of public comment opportunities on the Fort Peck Indian Reservation for proposed air pollution control permits via email at http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8.

2. All minor source applications (synthetic minor, modification to an existing facility, new true minor or general permit) are submitted to both the Tribes and the EPA per the application instructions (see http://www.epa.gov/caa-permitting/tribal-nsr-permitting-region-8).

3. The Tribes have 10 business days to respond to the EPA with questions and comments on the application.

4. In the event an AQIA is triggered, we email a copy of that document to the Tribes within 5 business days from the date we receive it.

5. We notify the Tribes of the public comment period for the proposed permit and provide copies of the notice of public comment opportunity to post in various locations of their choosing on the Reservation. We also notify the Tribes of the issuance of the final permit.

VII. Authority

Requirements under 40 CFR 49.151 to obtain a MNSR permit apply to new and modified minor stationary sources, and minor modifications at existing major stationary sources ("major" as defined in 40 CFR 52.21). In addition, the MNSR program provides a mechanism for an otherwise major stationary source to voluntarily accept restrictions on its potential to emit to become a synthetic minor source. The EPA is charged with direct implementation of these provisions where there is no approved Tribal implementation plan for implementation of the MNSR regulations. Pursuant to Section 301(d)(4) of the CAA (42 USC 7601(d)), the EPA is authorized to implement the MNSR regulations at 40 CFR 49.151 in Indian country. The CHS Farmers Elevator is proposed to be located within the exterior boundaries of the Fort Peck Indian Reservation in the eastern part of the State of Montana. The exact location is latitude 48.10972N and longitude 105.51833W, in Roosevelt County, Montana.

VIII. Public Notice & Comment, Hearing, and Appeals

A. Public Notice

In accordance with 40 CFR 49.157, we must provide public notice and a 30-day public comment period to ensure that the affected community and the general public have reasonable access to the application and proposed permit information. The application, the proposed permit, this technical support document, and all supporting materials for the proposed permit are available at:

Assiniboine and Sioux Tribes
Environmental Programs Office
P.O. Box 1027
Poplar, Montana 59255-1027
Contact: Deb Madison at (406) 768-2300 or 2horses@nemont.net

and

US EPA Region 8
Air Program Office
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202-1129
Contact: Stuart Siffring at (303) 312-6478 or siffring.stuart@epa.gov

All documents are available for review at our office Monday through Friday from 8:00 a.m. to 4:00 p.m. (excluding Federal holidays). Additionally, the proposed permit, technical support document, and other supporting documents can be reviewed on our website at http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8.

Any person may submit written comments on the proposed permit and may request a public hearing during the public comment period. These comments must raise any reasonably ascertainable issue with supporting arguments by the close of the public comment period (including any public hearing). Comments may be sent to us at the address above, or sent via an email to r8airpermitting@epa.gov, with the topic "Comments on MNSR Permit for CHS Farmers Elevator."

B. Public Hearing

A request for a public hearing must be in writing and must state the nature of the issues proposed to be raised at the hearing. We will hold a hearing whenever there is, on the basis of requests, a significant degree of public interest in a proposed permit. We may also hold a public hearing at our discretion, whenever, for instance, such a hearing might clarify one or more issues involved in the permit decision.

C. Final MNSR Permit Action

In accordance with 40 CFR 49.159, a final permit becomes effective 30 days after permit issuance, unless: (1) a later effective date is specified in the permit; or (2) appeal of the final permit is made as detailed in the next section; or (3) we may make the permit effective immediately upon issuance if no comments resulted in a change in the proposed permit or a denial of the permit. We will send notice of the final permit action to any individual who commented on the proposed permit during the public comment period. In addition, we will add the source to a list of final NSR permit actions which is posted on our website at http://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8. Anyone may request a copy of the final MNSR permit at any time by contacting the Region 8 Tribal Air Permit Program at (800) 227-8917 or sending an email to r8airpermitting@epa.gov.

D. Appeals to the Environmental Appeals Board (EAB)

In accordance with 40 CFR 49.159, within 30 days after a final permit decision has been issued, any person who filed comments on the proposed permit or participated in the public hearing may petition the Board to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when the Region has fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is, under section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we deny or issue a final permit and agency review procedures are exhausted.

MEMO TO FILE

DATE: April 13, 2016

SUBJECT: Fort Peck Indian Reservation; CHS Farmers Elevator, National Historic Preservation Act

FROM: Stuart Siffring, EPA Region 8 Air Program

TO: Source Files:
205c AirTribal FP CHS Farmers Elevator
TMNSR-FP-000010-2015.001
FRED # 108008

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment with regard to such undertakings. Under the ACHP's implementing regulations at 36 C.F.R. Part 800, Section 106 consultation is generally with state and tribal historic preservation officials in the first instance, with opportunities for the ACHP to become directly involved in certain cases. An "undertaking" is "a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval." 36 C.F.R. § 800.16(y).

Under the NHPA Section 106 implementing regulations, if an undertaking is a type of activity that has the potential to cause effects on historic properties, assuming any are present, then federal agencies consult with relevant historic preservation partners to determine the area of potential effect (APE) of the undertaking, to identify historic properties that may exist in that area, and to assess and address any adverse effects that may be caused on historic properties by the undertaking. If an undertaking is a type of activity that does not have the potential to cause effects on historic properties, the federal agency has no further obligations. 36 C.F.R. § 800.3(a)(1).

This memorandum describes EPA's efforts to assess potential effects on historic properties in connection with issuing a draft Federal Tribal True Minor New Source Review (TMNSR) permit to CHS Farmers Elevator (CHS), located within the exterior boundaries of the Fort Peck Indian Reservation in Roosevelt County, Montana. As explained further below, EPA is finding that the proposed action does not have the potential to cause effects on historic properties, even assuming such historic properties are present.

Permit Request

The EPA received an application from the CHS Farmers Elevator (CHS), requesting a true minor permit in accordance with the requirements of the minor NSR Permit Program at 40 CFR Part 49. The permit action, as requested in the permit application from CHS, incorporates emission limits due to control devices installed on new equipment at the facility. Farmers Elevator is an existing facility located on a

rail line located within the federally-recognized exterior boundaries of the Fort Peck Indian Reservation. The facility location is given below:

SENE ¼, Sec 9 T27N R48E
Latitude: 48.10972N
Longitude: -105.51833W

Although, the emissions at this existing facility are increasing due to this permit action, the new emission sources will be controlled using baghouses with 96% - 99% particulate matter control efficiency. Therefore, the impacts to local air quality from the proposed project are not expected to be significant. In addition, this permit action only authorizes the construction of new emission sources entirely within the existing footprint of the facility.

Finding of No Potential to Cause Effects

The EPA has reviewed the proposed action for potential impacts on historic properties. Because the activities authorized by the EPA permit are entirely within the existing footprint of the facility, the Agency finds that this project does not have the potential to cause effects on historic properties, even assuming any are present.

State and Tribal Consultation

Because this undertaking is a type of activity that does not have the potential to cause effects on historic properties, the EPA has no further obligations under Section 106 of the National Historic Preservation Act or 36 C.F.R. part 800.

MEMO TO FILE

DATE: April 13, 2016

SUBJECT: Fort Peck Indian Reservation; CHS Farmers Elevator, Endangered Species Act

FROM: Stuart Siffring, EPA Region 8 Air Program

TO: Source Files:
205c AirTribal FP CHS Farmers Elevator
TMNSR-FP-000010-2015.001
FRED # 108008

Pursuant to Section 7 of the Endangered Species Act (ESA), 16 U.S.C. §1536, and its implementing regulations at 50 CFR, part 402, the EPA is required to ensure that any action authorized, funded, or carried out by the Agency is not likely to jeopardize the continued existence of any Federally-listed endangered or threatened species or result in the destruction or adverse modification of such species' designated critical habitat. Under ESA, those agencies that authorize, fund, or carry out the federal action are commonly known as "action agencies." If an action agency determines that its federal action "may affect" listed species or critical habitat, it must consult with the U.S. Fish and Wildlife Service (FWS). If an action agency determines that the federal action will have no effect on listed species or critical habitat, the agency will make a "no effect" determination. In that case, the action agency does not initiate consultation with the FWS and its obligations under Section 7 are complete.

In complying with its duty under ESA, the EPA, as the action agency, examined the potential effects on listed species and designated critical habitat relating to issuing this Clean Air Act (CAA) Tribal True Minor New Source Review (TMNSR) permit.

Region 8 Air Program Determination

The EPA has concluded that the proposed TMNSR permit action will have "*No effect"* on listed species or critical habitat.

The CHS Farmers Elevator is an existing minor source for the purposes of the PSD Permit Program at 40 CFR Part 52. The proposed project is not a major modification, as defined under the PSD Permit Program, as the potential to emit all NSR-regulated pollutants for the project is less than 250 tpy and the proposed increase in allowable emissions for all NSR regulated pollutants for the project are less than the respective significant emission rates for major PSD sources at 40 CFR 52.21(b)(23)(i). The proposed project is estimated to result in an increase in allowable emissions of 28.55 tpy PM, 8.88 tpy PM_{10}, and 1.51 tpy $PM_{2.5}$ emissions. For PM, PM_{10}, and $PM_{2.5}$ the significant emission rates for existing major PSD sources is 25 tpy, 15 tpy, and 3 tpy respectively. Since the background concentration of PM10 and PM2.5 in Roosevelt County is low in comparison to the NAAQS, a less than 9 tpy increase in PM_{10} emissions and a less than 2 tpy increase in $PM_{2.5}$ emissions is expected to have very little effect on localized NAAQS values, given that both are approximately half of the PSD significance thresholds for a major source. Therefore, the impacts to local air quality from the proposed project are not expected to be significant and should not have an adverse impact on attainment of the NAAQS or cause or

contribute to PSD increment violation. The new emission sources will also be controlled using baghouses with 96% - 99% particulate matter control efficiency. Therefore, the impacts to local air quality from the proposed project are not expected to be significant. In addition, this permit action only authorizes the construction of new emission sources entirely within the existing footprint of the facility. Because the EPA has determined that the federal action will have no effect, the agency made a *"No effect"* determination, did not initiate consultation with the FWS and its obligations under Section 7 are complete.

Permit Request

The EPA received an application from the CHS Farmers Elevator (CHS), requesting a true minor permit in accordance with the requirements of the minor NSR Permit Program at 40 CFR Part 49. The permit action, as requested in the permit application from CHS, incorporates emission limits due to control devices installed on new equipment at the facility. Farmers Elevator is an existing facility located on a rail line located within the federally-recognized exterior boundaries of the Fort Peck Indian Reservation. The facility location is given below:

SENE ¼, Sec 9 T27N R48E
Latitude: 48.10972N
Longitude: -105.51833W

Although, the emissions at this existing facility are increasing due to this permit action, the new emission sources will be controlled using baghouses with 96% - 99% particulate matter control efficiency. Therefore, the impacts to local air quality from the proposed project are not expected to be significant. In addition, this permit action only authorizes the construction of new emission sources entirely within the existing footprint of the facility.

Conclusion

The EPA has concluded that the proposed true MNSR permit action will have "*No effect"* on listed species or critical habitat for the following reasons:

1. The proposed permit action only authorizes the construction of new emission sources that are contained entirely within the existing footprint of the facility.
2. The emissions, approved at present, from the existing facility will be controlled using baghouses with 96% - 99% particulate matter control efficiency. Therefore, the impacts to local air quality from the proposed project are not expected to be significant.

Because the EPA has determined that the federal action will have no effect, the agency will make a *"No effect"* determination. In that case, the EPA does not initiate consultation with the FWS and its obligations under Section 7 are complete.

MEMO TO FILE

DATE: April 13, 2016

SUBJECT: Fort Peck Indian Reservation; CHS Farmers Elevator, Environmental Justice

FROM: Stuart Siffring, EPA Region 8 Air Program

TO: Source Files:
205c AirTribal FP CHS Farmers Elevator
TMNSR-FP-000010-2015.001
FRED # 108008

On February 11, 1994, the President issued Executive Order 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." The Executive Order calls on each federal agency to make environmental justice a part of its mission by "identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations."

The EPA defines "Environmental Justice" as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and polices. The EPA's goal with respect to Environmental Justice in permitting is to enable overburdened communities to have full and meaningful access to the permitting process and to develop permits that address environmental justice issues to the greatest extent practicable under existing environmental laws. *Overburdened* is used to describe the minority, low-income, tribal and indigenous populations or communities in the United States that potentially experience disproportionate environmental harms and risks as a result of greater vulnerability to environmental hazards.

This discussion describes our efforts to identify environmental justice communities and assess potential effects in connection with issuing this permit in Roosevelt County, within the exterior boundaries of the Fort Peck Indian Reservation.

Region 8 Air Program Determination

Based on the findings described in the following sections of this memorandum, we conclude that issuance of the aforementioned permits are not expected to have disproportionately high or adverse human health effects on overburdened communities in the vicinity of the facility on the Fort Peck Indian Reservation.

Permit Request

The EPA received an application from the CHS Farmers Elevator (CHS), requesting a true minor permit in accordance with the requirements of the minor NSR Permit Program at 40 CFR Part 49. The permit action, as requested in the permit application from CHS, incorporates emission limits due to control devices installed on new equipment at the facility. Farmers Elevator is an existing facility located on a

rail line located within the federally-recognized exterior boundaries of the Fort Peck Indian Reservation. The facility location is given below:

SENE ¼, Sec 9 T27N R48E
Latitude: 48.10972N
Longitude: -105.51833W

Although, the emissions at this existing facility are increasing due to this permit action, the new emissions will be well controlled at all times. In addition, this permit action only authorizes the construction of new emission sources entirely within the existing footprint of the facility.

Air Quality Review

The minor NSR regulations at 40 CFR 49.154(d) require that an Air Quality Impact Assessment (AQIA) modeling analysis be performed if there is reason to be concerned that new construction would cause or contribute to a National Ambient Air Quality Standard (NAAQS) or PSD increment violation. If an AQIA reveals that the proposed construction could cause or contribute to a NAAQS or PSD increment violation, such impacts must be addressed before a pre-construction permit can be issued. The ambient air concentrations measured at the station nearest the facility, show that concentrations for the various NSR regulated pollutants in the project area are in attainment with the NAAQS. Impacts to local air quality from the proposed project are not expected to be significant and should not have an adverse impact on attainment of the NAAQS. We have determined that an AQIA modeling analysis is not required for this permit action.

For purposes of Executive Order 12898 on environmental justice, the EPA has recognized that compliance with the NAAQS is "emblematic of achieving a level of public health protection that, based on the level of protection afforded by a primary NAAQS, demonstrates that minority or low-income populations will not experience disproportionately high and adverse human health or environmental effects due to the exposure to relevant criteria pollutants." *In re Shell Gulf of Mexico, Inc. & Shell Offshore, Inc.*, 15 E.A.D., slip op. at 74 (EAB 2010). This is because the NAAQS are health-based standards, designed to protect public health with an adequate margin of safety, including sensitive populations such as children, the elderly, and asthmatics.

Environmental Impacts to Potentially Overburdened Communities

The permit action, as requested in the permit application from CHS, incorporates emission limits due to control devices installed on new equipment at the facility. A map of the area surrounding the facility showing total population based on the U.S. Census Bureau 2010 demographic data is attached to this memorandum.

Furthermore, the permit contains a provision stating, "*The permitted source shall not cause or contribute to a National Ambient Air Quality Standard violation or a PSD increment violation.*" Noncompliance with this permit provision is a violation of the permit and is grounds for enforcement action and for permit termination or revocation. As a result, we conclude that issuance of the aforementioned permit will not have disproportionately high or adverse human health effects on communities in the vicinity of the Fort Peck Indian Reservation.

Tribal Consultation and Enhanced Public Participation

The EPA offers Tribal Government Leaders an opportunity to consult on each permit action. Tribal Government Leaders are asked to respond to our offer to consult within 30 days. The Chairman of the Assiniboine and Sioux Tribes was offered an opportunity to consult on this permit action via a letter dated June 11, 2014.

Given the presence of potentially overburdened communities in the vicinity of the facility, we are providing an enhanced public participation process for this permit.

1. Interested parties can subscribe to an EPA listserve that notifies them of public comment opportunities on the Fort Peck Indian Reservation for proposed air pollution control permits via email at http://www2.epa.gov/region8/air-permit-public-comment-opportunities.

2. All minor source applications (synthetic minor, modification to an existing facility, new true minor or general permit) are submitted to both the Tribe and us per the application instructions (see http://www2.epa.gov/region8/tribal-minor-new-source-review-permitting).

3. The Tribe has 10 business days to respond to us with questions and comments on the application.

4. In the event an AQIA is triggered, we email a copy of that document to the Tribe within 5 business days from the date we receive it.

5. We notify the Tribe of the public comment period for the proposed permit and provide copies of the notice of public comment opportunity to post in various locations of their choosing on the Reservation. We also notify the Tribe of the issuance of the final permit.

EJSCREEN Census 2010 Summary Report

Location: User-specified point center at 48.109720, -105.518330
Ring (buffer): 5-mile radius
Description: CHS Farmers Elevator

Summary	Census 2010
Population	465
Population Density (per sq. mile)	7
Minority Population	201
% Minority	43%
Households	165
Housing Units	195
Land Area (sq. miles)	63.54
% Land Area	100%
Water Area (sq. miles)	0.30
% Water Area	0%

Population by Race	Number	Percent
Total	465	-------
Population Reporting One Race	446	96%
White	265	57%
Black	1	0%
American Indian	175	38%
Asian	3	1%
Pacific Islander	0	0%
Some Other Race	0	0%
Population Reporting Two or More Races	19	4%
Total Hispanic Population	5	1%
Total Non-Hispanic Population	460	99%
White Alone	264	57%
Black Alone	1	0%
American Indian Alone	174	37%
Non-Hispanic Asian Alone	3	1%
Pacific Islander Alone	0	0%
Other Race Alone	0	0%
Two or More Races Alone	18	4%

Population by Sex	Number	Percent
Male	239	51%
Female	226	49%

Population by Age	Number	Percent
Age 0-4	28	6%
Age 0-17	114	25%
Age 18+	351	75%
Age 65+	72	15%

Households by Tenure	Number	Percent
Total	165	
Owner Occupied	127	77%
Renter Occupied	38	23%

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.
Source: U.S. Census Bureau, Census 2010 Summary File 1.

U.S. Fish & Wildlife Service

CHS Farmers Elevator; TMNSR-FP-000010-2015.001

IPaC Trust Resource Report

Generated September 11, 2015 01:59 PM MDT

US Fish & Wildlife Service

IPaC Trust Resource Report

Project Description

NAME

CHS Farmers Elevator;
TMNSR-FP-000010-2015.001

PROJECT CODE

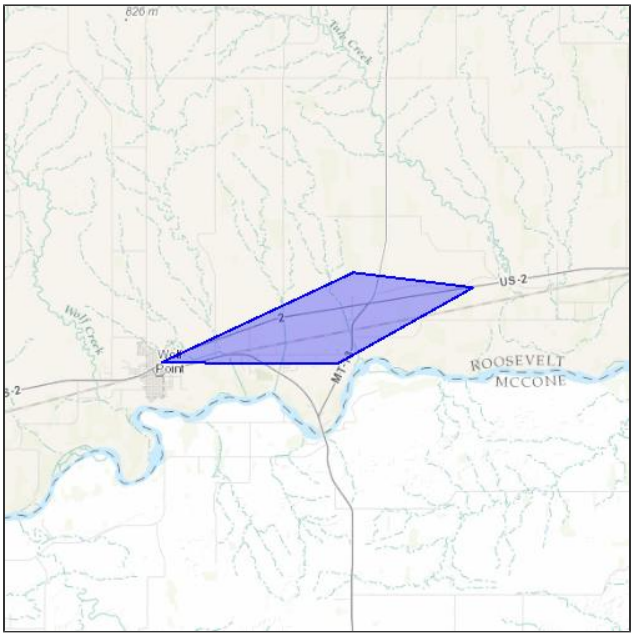
QOPJH-CUZKN-AW7PG-FCJHO-TXVEIM

LOCATION

Roosevelt County, Montana

DESCRIPTION

CAA true minor NSR permit application on the Ft Peck Indian Reservation



U.S. Fish & Wildlife Contact Information

Species in this report are managed by:

Montana Ecological Services Field Office
585 Shepard Way, Suite 1
Helena, MT 59601-6287
(406) 449-5225

Endangered Species

Proposed, candidate, threatened, and endangered species that are managed by the Endangered Species Program and should be considered as part of an effect analysis for this project.

This unofficial species list is for informational purposes only and does not fulfill the requirements under Section 7 of the Endangered Species Act, which states that Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action." This requirement applies to projects which are conducted, permitted or licensed by any Federal agency.

A letter from the local office and a species list which fulfills this requirement can be obtained by returning to this project on the IPaC website and requesting an Official Species List from the regulatory documents section.

Birds

Least Tern Sterna antillarum — **Endangered**

CRITICAL HABITAT
No critical habitat has been designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B07N

Piping Plover Charadrius melodus — **Threatened**

CRITICAL HABITAT
There is **final** critical habitat designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B079

Red Knot Calidris canutus rufa — **Threatened**

CRITICAL HABITAT
No critical habitat has been designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0DM

Sprague's Pipit Anthus spragueii — **Candidate**

CRITICAL HABITAT
No critical habitat has been designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0GD

Whooping Crane Grus americana — **Endangered**

CRITICAL HABITAT
There is **final** critical habitat designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B003

Fishes

Pallid Sturgeon Scaphirhynchus albus **Endangered**

CRITICAL HABITAT

No critical habitat has been designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=E06X

Critical Habitats

Potential effects to critical habitat(s) within the project area must be analyzed along with the endangered species themselves.

There is no critical habitat within this project area

Migratory Birds

Birds are protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act.

Any activity which results in the take of migratory birds or eagles is prohibited unless authorized by the U.S. Fish and Wildlife Service (1). There are no provisions for allowing the take of migratory birds that are unintentionally killed or injured.

You are responsible for complying with the appropriate regulations for the protection of birds as part of this project. This involves analyzing potential impacts and implementing appropriate conservation measures for all project activities.

American Bittern Botaurus lentiginosus — **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0F3

Baird's Sparrow Ammodramus bairdii — **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B09B

Bald Eagle Haliaeetus leucocephalus — **Bird of conservation concern**
Year-round
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B008

Black Tern Chlidonias niger — **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B09F

Black-billed Cuckoo Coccyzus erythropthalmus — **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HI

Brewer's Sparrow Spizella breweri — **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HA

Burrowing Owl Athene cunicularia — **Bird of conservation concern**
Season: Breeding

Common Tern Sterna hirundo — **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B09G

Dickcissel Spiza americana — **Bird of conservation concern**
Season: Breeding

Ferruginous Hawk Buteo regalis — **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B06X

Golden Eagle Aquila chrysaetos — **Bird of conservation concern**
Year-round
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0DV

Grasshopper Sparrow Ammodramus savannarum **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0G0

Greater Sage-grouse Centrocercus urophasianus **Bird of conservation concern**
Year-round
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B06W

Loggerhead Shrike Lanius ludovicianus **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0FY

Long-billed Curlew Numenius americanus **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B06S

Marbled Godwit Limosa fedoa **Bird of conservation concern**
Season: Breeding

Mccown's Longspur Calcarius mccownii **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HB

Red-headed Woodpecker Melanerpes erythrocephalus **Bird of conservation concern**
Season: Breeding

Short-eared Owl Asio flammeus **Bird of conservation concern**
Year-round
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HD

Sprague's Pipit Anthus spragueii **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0GD

Swainson's Hawk Buteo swainsoni **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B070

Upland Sandpiper Bartramia longicauda **Bird of conservation concern**
Season: Breeding
https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HC

Yellow Rail Coturnicops noveboracensis **Bird of conservation concern**
Season: Breeding

Refuges

Any activity proposed on National Wildlife Refuge lands must undergo a 'Compatibility Determination' conducted by the Refuge. If your project overlaps or otherwise impacts a Refuge, please contact that Refuge to discuss the authorization process.

There are no refuges within this project area

Wetlands

Impacts to NWI wetlands and other aquatic habitats from your project may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal Statutes.

Project proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate U.S. Army Corps of Engineers District.

DATA LIMITATIONS

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

DATA EXCLUSIONS

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

DATA PRECAUTIONS

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Freshwater Emergent Wetland

PEMA	248.0 acres
PEMC	139.0 acres
PEMB	17.5 acres
PEMF	14.3 acres
PEMCx	1.52 acres
PEMAx	1.41 acres
PEMAh	0.682 acre
PEMFx	0.492 acre
PEMCh	0.316 acre

Freshwater Forested/shrub Wetland

PFOA	8.24 acres

PSSA 1.55 acres

Freshwater Pond

PUBFx 1.64 acres

PABF 0.803 acre

Other

PUSCx 0.433 acre

TMNSR-FP-000010 - ~~TV~~ 2015.001
True Minor NSR Permit

CHS

5500 Cenex Drive
Inver Grove Heights, MN
55077-1721

651-355-6000
chsinc.com

VIA UPS DELIVERY

July 24, 2015

Federal Minor NSR Permit Coordinator
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street, 8P-AR
Denver, CO 80202-1129

Dear Sir or Madam:

Enclosed you will find a completed Form NEW for CHS Farmers Elevator's country grain elevator located at 6134 Highway 13, Wolf Point, Montana. This grain handling facility (SIC 5153) is located in Roosevelt County and within the exterior boundaries of the Fort Peck Indian Reservation, Montana. CHS Farmers Elevator considers its country grain elevator to be a minor source for air emissions.

In accordance with 40 CFR Part 49, this submittal serves as our initial registration with the U.S. Environmental Protection Agency – Region 8 for an affected facility located on a Native American Reservation. In addition, this submittal is intended to notify the Agency of expansion activities at the facility, and serves as an application for construction as an existing minor source.

If you have any questions or need any additional information in respect to this submittal or the information contained within, please contact me at 952-334-0024 or email at charley.kubler@chsinc.com, or Brian Duffy at 651-355-6864 or email at brian.duffy@chsinc.com.

I have reviewed this application and based on information and belief formed after reasonable inquiry, I certify that the statements and information contain in these documents are true, accurate and complete.

Sincerely,

Charley Kubler

Charley Kubler, CHMM
Division Environmental Manager

Attachments: Two copies of Form NEW

Cc: Deb Madison – Fort Peck Tribes Office of Environmental Protection
Mark Dreesen (CHS)
James Hardy (CHS)
Pete Mutschler (CHS
Brian Duffy (CHS)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
FEDERAL MINOR NEW SOURCE REVIEW PROGRAM IN INDIAN COUNTRY
40 CFR 49.151
Application for New Construction
(Form NEW)

Please check all that apply to show how you are using this form:

- **Proposed Construction of a New Source**
- **x Proposed Construction of New Equipment at an Existing Source**
- **Proposed Modification of an Existing Source**
- **Other – Please Explain**

Use of this information request form is voluntary and not yet approved by the Office of Management and Budget. The following is a check list of the type of information that Region 8 will use to process information on your proposed project. While submittal of this form is not required, it does offer details on the information we will use to complete your requested approval and providing the information requested may help expedite the process. Use of application forms for this program is currently under Office of Management and Budget review and these information request forms will be replaced/updated after that review is completed.

Please submit information to following two entities:

Federal Minor NSR Permit Coordinator
U.S. EPA, Region 8
1595 Wynkoop Street, 8P-AR
Denver, CO 80202-1129
R8airpermitting@epa.gov

For more information, visit:
http://www2.epa.gov/region8/tribal-minor-new-source-review-permitting

The Tribal Environmental Contact for the specific reservation:

If you need assistance in identifying the appropriate Tribal Environmental Contact and address, please contact:

R8airpermitting@epa.gov

A. GENERAL SOURCE INFORMATION

1. (a) **Company Name** (Who owns this facility?) CHS Inc. (b) **Operator Name** (Is the company that operates this facility different than the company that owns this facility? What is the name of the company?) No	2. **Facility Name** CHS Farmers Elevator – Macon
	4. Portable Source? Yes x No 5. Temporary Source? Yes x No
6. NAICS Code 424510	7. SIC Code 5153
8. Physical Address (Or, home base for portable sources) 6134 Highway 13, Wolf Point, MT 59201	

9. Reservation* Fort Peck Reservation	10. County* Roosevelt	11a. Latitude (decimal format)* 48.10972	11b. Longitude (decimal format)* -105.51833
12a. Quarter Quarter Section* SENE	12b. Section* 9	12c. Township* T-27-N	12d. Range* R-48-E

*Provide all proposed locations of operation for portable sources

B. PREVIOUS PERMIT ACTIONS (Provide information in this format for each permit that has been issued to this source. Provide as an attachment if additional space is necessary)

Facility Name on the Permit NA
Permit Number (xx-xxx-xxxxx-xxxx.xx)
Date of the Permit Action

Facility Name on the Permit NA
Permit Number (xx-xxx-xxxxx-xxxx.xx)
Date of the Permit Action

Facility Name on the Permit NA
Permit Number (xx-xxx-xxxxx-xxxx.xx)
Date of the Permit Action

Facility Name on the Permit NA
Permit Number (xx-xxx-xxxxx-xxxx.xx)
Date of the Permit Action

Facility Name on the Permit NA
Permit Number (xx-xxx-xxxxx-xxxx.xx)
Date of the Permit Action

C. CONTACT INFORMATION

Company Contact (Who is the primary contact for the company that owns this facility?) James Hardy	Title Manager
Mailing Address 6134 Highway 13, Wolf Point, MT 59201	
Email Address james.hardy@chsinc.com	
Telephone Number 406-525-3413	Facsimile Number 406-525-3415
Operator Contact (Is the company that operates this facility different than the company that owns this facility? Who is the primary contact for the company that operates this facility?) Same as above	Title
Mailing Address	
Email Address	
Telephone Number	Facsimile Number
Permitting Contact (Who is the person primarily responsible for Clean Air Act permitting for the company? We are seeking one main contact for the company. Please do not list consultants.) Brian Duffy	Title Senior Environmental Professional
Mailing Address 5500 Cenex Drive, Inver Grove Heights, MN 55077-1733	
Email Address brian.duffy@chsinc.com	
Telephone Number 651-355-6864	Facsimile Number 651-355-6996
Compliance Contact (Is the person responsible for Clean Air Act compliance for this company different than the person responsible for Clean Air Act permitting? Who is the person primarily responsible for Clean Air Act compliance for the company? We are seeking one main contact for the company. Please do not list consultants.) Charley Kubler, CHMM	Title Division Environment Manager
Mailing Address 5500 Cenex Drive, Inver Grove Heights, MN 55077-1733	
Email Address charley.kubler@chsinc.com	
Telephone Number 952-334-0024	Facsimile Number 651-355-6996

D. ATTACHMENTS

Include all of the following information (see the attached instructions)

*Please do not send Part 71 Operating Permit Application Forms in lieu of the check list below.

FORM SYNMIN - New Source Review Synthetic Minor Limit Request Form, if synthetic minor limits are being requested.

x Narrative description of the proposed production processes. This description should follow the flow of the process flow diagram to be submitted with this application. *(See attached narrative for Section D.)*

x Process flow chart identifying all proposed processing, combustion, handling, storage, and emission control equipment. *(See Appendix A)*

x A list and descriptions of all proposed emission units and air pollution-generating activities. *(See attached narrative for Section D.)*

x Type and quantity of fuels, including sulfur content of fuels, proposed to be used on a daily, annual and maximum hourly basis. *(See attached narrative for Section D.)*

x Type and quantity of raw materials used or final product produced proposed to be used on a daily, annual and maximum hourly basis. *(See attached narrative for Section D and Appendix B)*

x Proposed operating schedule, including number of hours per day, number of days per week and number of weeks per year. *(See attached narrative for Section D.)*

x A list and description of all proposed emission controls, control efficiencies, emission limits, and monitoring for each emission unit and air pollution generating activity. *(See attached narrative for Section D.)*

x **Criteria Pollutant Emissions** - Estimates of Current Actual Emissions, Current Allowable Emissions, Post-Change Uncontrolled Emissions, and Post-Change Allowable Emissions for the following air pollutants: particulate matter, PM_{10}, $PM_{2.5}$, sulfur oxides (SOx), nitrogen oxides (NOx), carbon monoxide (CO), volatile organic compound (VOC), lead (Pb) and lead compounds, fluorides (gaseous and particulate), sulfuric acid mist (H_2SO_4), hydrogen sulfide (H_2S), total reduced sulfur (TRS) and reduced sulfur compounds, including all calculations for the estimates. *(See attached narrative for Section D and Appendix C)*

These estimates are to be made for each emission unit, emission generating activity, and the project/source in total. Note, there are no insignificant emission units or activities in this permitting program, only exempted units and activities. Please see the regulation for a list of exempted units and activities.

x **Air Quality Review** *(See attached narrative for Section D.)*

x **ESA (Endangered Species Act)** *(See attached narrative for Section D.)*

x **NHPA (National Historic Preservation Act)** *(See attached narrative for Section D.)*

E. TABLE OF ESTIMATED EMISSIONS

The following tables provide the total emissions in tons/year for all pollutants from the calculations required in Section D of this form, as appropriate for the use specified at the top of the form.

E(i) – Proposed New Source

Pollutant *Refer to Table E(ii).*	**Potential Emissions (tpy)**	**Proposed Allowable Emissions (tpy)**
PM	-	-
PM_{10}	-	-
$PM_{2.5}$	-	-
SO_2	-	-
NO_x	-	-
CO	-	-
VOC	-	-
Pb	-	-
Fluorides	-	-
H_2SO_4	-	-
H_2S	-	-
TRS	-	-
RSC	-	-

PM - Particulate Matter
PM_{10} - Particulate Matter less than 10 microns in size
$PM_{2.5}$ - Particulate Matter less than 2.5 microns in size
SO_2 - Sulfur Oxides
NOx - Nitrogen Oxides
CO - Carbon Monoxide
VOC - Volatile Organic Compound
Pb - Lead and lead compounds
Fluorides - Gaseous and particulates
H_2SO_4 - Sulfuric Acid Mist
H_2S - Hydrogen Sulfide
TRS - Total Reduced Sulfur
RSC - Reduced Sulfur Compounds

Emissions calculations must include fugitive emissions if the source is one the following listed sources, pursuant to CAA Section 302(j):

(a) Coal cleaning plants (with thermal dryers);
(b) Kraft pulp mills;
(c) Portland cement plants;
(d) Primary zinc smelters;
(e) Iron and steel mills;
(f) Primary aluminum ore reduction plants;
(g) Primary copper smelters;
(h) Municipal incinerators capable of charging more than 250 tons of refuse per day;
(i) Hydrofluoric, sulfuric, or nitric acid plants;
(j) Petroleum refineries;
(k) Lime plants;
(l) Phosphate rock processing plants;
(m) Coke oven batteries;
(n) Sulfur recovery plants;
(o) Carbon black plants (furnace process);
(p) Primary lead smelters;
(q) Fuel conversion plants;
(r) Sintering plants;
(s) Secondary metal production plants;
(t) Chemical process plants
(u) Fossil-fuel boilers (or combination thereof) totaling more than 250 million British thermal units per hour heat input;
(v) Petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels;
(w) Taconite ore processing plants;
(x) Glass fiber processing plants;
(y) Charcoal production plants;
(z) Fossil fuel-fired steam electric plants of more that 250 million British thermal units per hour heat input, and
(aa) Any other stationary source category which, as of August 7, 1980, is being regulated under section 111 or 112 of the Act.

E(ii) – Proposed New Construction at an Existing Source or Modification of an Existing Source

Pollutant	Current Actual Emissions (tpy)	Current Allowable Emissions (tpy)	Post-Change Potential Emissions (tpy)	Post-Change Allowable Emissions (tpy)
PM	73.70	132.46	161.01	161.01
PM_{10}	27.43	41.22	50.10	50.10
$PM_{2.5}$	5.82	6.98	8.49	8.49
SO_2	-	-	-	-
NO_x	-	-	-	-
CO	-	-	-	-
VOC	-	-	-	-
Pb	-	-	-	-
Fluorides	-	-	-	-
H_2SO_4	-	-	-	-
H_2S	-	-	-	-
TRS	-	-	-	-
RSC	-	-	-	-

Note: Current actual emissions and current allowable emissions were estimated using grain elevator throughput for calendar year 2011 (the highest of five years throughput from 2010-2014). Post-change potential emissions and post-change allowable emissions were estimated based upon a maximum throughput of 15,000,000 bushels with the expansion. PTE from fugitives were not included (see attached narrative for Section D).

PM - Particulate Matter
PM_{10} - Particulate Matter less than 10 microns in size
$PM_{2.5}$ - Particulate Matter less than 2.5 microns in size
SO_2 - Sulfur Oxides
NOx - Nitrogen Oxides
CO - Carbon Monoxide
VOC - Volatile Organic Compound
Pb - Lead and lead compounds
Fluorides - Gaseous and particulates
H_2SO_4 - Sulfuric Acid Mist
H_2S - Hydrogen Sulfide
TRS - Total Reduced Sulfur
RSC - Reduced Sulfur Compounds

The public reporting and recordkeeping burden for this collection of information is estimated to average 20 hours per response, unless a modeling analysis is required. If a modeling analysis is required, the public reporting and recordkeeping burden for this collection of information is estimated to average 60 hours per response .Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

CHS Farmers Elevator
SECTION D - ATTACHMENTS

Process Description:

CHS Farmers Elevator operates a country grain elevator located at Macon Junction in Roosevelt County (Fort Peck Reservation), Montana. This grain handling facility, with an existing permanent storage capacity of 996,000 bushels, currently receives, cleans and stores various grains from local farmers for storage until shipment to a variety of markets via rail car. Area grain is hauled to the facility from local farmers via hopper trucks (approximately 98%) and straight trucks (approximately 2%) and routed to the receiving area of the grain elevator, where grain is gravity fed into a receiving pit for placement into storage.

After unloading, grain is transferred to storage bins through the grain elevator by means of a receiving pit(s), various conveyors and elevator legs, typical of country grain elevators across the United States. The receiving conveyors and elevator legs routes the grain to storage bins. When ready for shipment, the shipping conveyors and elevator legs distribute grain to the bulk weighing system prior to load-out into railcars. A very small portion (less than 1 %) of grain products is transported via hopper truck either as screenings or for transfer to other CHS Inc. operations. The grain received at the elevator is cleaned at the same time it is being physically transferred from the receiving area and placed into the storage bins. A minor portion of grain is cleaned as a separate operation due to limited storage. The receiving pit, the elevator legs and the cleaning system are equipped with a total of three cyclone systems for the control of particulate matter (PM, PM_{10} and $PM_{2.5}$).

The facility does not currently combust either natural gas, propane or fuel oil for either grain drying or convenience heating purposes. There are no temporary grain storage areas (i.e. outside bunkers) on-site. Fumigation is not performed at the elevator.

CHS Farmers Elevator is expanding the overall receiving, storing, cleaning and shipping capacities of the existing facility. This expansion includes the following: two additional truck receiving pits with bag-houses; fourteen additional silos and bins that increase the permanent storage capacity for the facility to approximately 1.92 million bushels; a new railcar receiving hopper (pit); a new workhouse grain handling system; an additional cleaning system with a bag-house; additional grain load-out capacity for railcars and associated conveyors, elevator legs with bag-houses, etc. With the expansion, the load-out capacity for railcars is increasing from 36,000 to approximately 90,000 bushels per hour with the potential throughput estimated at around 15,000,000 or more bushels.

This country grain elevator is covered by Standard Industrial Classification (SIC) code 5153, *Grain and Field Bean*; and the North American Industry Classification System (NAICS) code 424510, *Grain and Field Bean Merchant Whole-seller*. As defined by 40 CFR Part 49, this grain elevator facility is considered to be a minor source.

Process Flow Schematics:

Process flow and equipment schematics are attached in Appendix A. Facility site location maps and aerials are attached in Appendix F.

List and Description of all Emissions Units and Air Pollution Generating Activities:

1. Existing Emission Units at the Grain Elevator Facility
    a. Truck receiving pit and conveyor(s)
        i. 6,500 bushels per hour capacity
    b. Internal grain handling (2 receiving/shipping elevator legs and conveyor(s))
        i. 18,000 bushels per hour per leg capacity
    c. Eighteen (18) upright grain storage bins
        i. 996,000 bushels total permanent storage capacity
    d. Railcar grain load-out
        i. 36,000 bushels per hour (using two legs) capacity
        ii. Truck grain load-out only for screenings
    e. Associated grain handling equipment (conveyors, belts, etc.)
    f. Unpaved roadway (fugitive emissions)

2. New Emission Units at the Grain Elevator Facility
    a. Two (2) new truck grain receiving areas including associated hoppers, conveyors, screens, receiving building etc. - 20,000 bushels/hour capacity each
    b. One (1) new railcar grain receiving hopper (pit) and receiving and drag conveyor (rated at 15,000 bushels per hour); and associated tunnel
    c. Two (2) new truck receiving elevator legs – 30,000 bushels per hour capacity each
    d. One (1) concrete workhouse with receiving tower and supporting for legs, distributors and screeners, four Kanal aeration systems
        i. Containing fourteen (14) upright silos and bins
        ii. 555,200 bushels total permanent storage capacity
    e. One (1) upright concrete silo and associated tunnel
        i. 360,000 bushels total permanent storage capacity
    f. Workhouse (headhouse) grain handling system (i.e. legs, conveyors, belts, distributors, spouts, etc.) with individual capacities ranging from 5,000 to 60,000 bushels per hour
    g. One (1) bulk weighing system with a capacity of 80,000 bushels per hour
    h. One (1) cleaning system with associated legs and conveyors (capacities ranging from 5,000 to 15,000 bushels per hour
    i. Grain load-out and shipping (i.e. legs, conveyors, screeners, spouts, tunnel, etc.); railcar load-out capacity – 60,000 bushels per hour
    j. One (1) truck load-out area

Raw Materials:

The grain elevator receives, cleans, stores and ships the following grain commodities:

1. Spring wheat
2. Winter wheat

Refer to Appendix B for a listing of each grain type and the quantities shipped during the past five calendar years.

Operating Schedule:

1. Monday through Friday, 7:30 AM through 5:30 PM, fifty two (52) weeks per year. Variations in the operating schedule could occur during certain seasons due to agricultural activities such as harvesting.

List of Emissions Controls:

1. Description of Existing Particulate Matter Emission Controls
    a. Cyclones
        i. Receiving pit – estimated control efficiency for PM 48%; for PM_{10} 36%
        ii. Elevator legs – estimated control efficiency for PM 48%; for PM_{10} 36%
        iii. Grain cleaning – estimated control efficiency for PM 48%; for PM_{10} 36%

2. Description of New Additional Particulate Matter Emission Controls
    a. Two (2) new cartridge style bag houses for elevator legs – estimated control efficiency 99% for PM and 93% for PM_{10} (Donaldson or similar)
    b. Two (2) new bag-houses for truck receiving areas (Donaldson, New York Blower or similar) – estimated control efficiency 99% for PM and 93% for PM_{10}
    c. One (1) new bag-house for cleaning area (Donaldson, New York Blower or similar) – estimated control efficiency 99% for PM and 93% for PM_{10}

The estimated control efficiencies provided above are from the Minnesota Pollution Control Agency's guidance document "*Facts About Control Equipment Performance Standards*" published April, 2008 and the Minnesota Administrative Rules 7011.0070 "*Listed Control Equipment and Control Equipment Efficiencies*".

Criteria Pollutant Emissions:

Refer to Appendix C for actual and potential emission calculations and spreadsheets. Note that the spreadsheets used in calculating PM and PM_{10} emissions were developed for country grain elevators by the Minnesota Pollution Control Agency (April, 2012 version). They have been modified slightly to include associated emissions for $PM_{2.5}$. The air emission factors for PM, PM_{10} and $PM_{2.5}$ utilized throughout the spreadsheets are based upon those found in EPA - AP 42, Volume 1, Fifth Edition, Chapter 9.9.1, *Grain Elevator Processes,* and Chapter 13.2.2, *Unpaved Roads*.

Referencing Chapters 9.9.1, estimated actual and potential emissions are provided in Appendix C for the following grain elevator processes found at this elevator:

1. Grain receiving
2. Grain cleaning
3. Head-house and grain handling
4. Storage bins
5. Grain shipping

Pursuant to EPA's November 14, 1995 Memorandum "*Calculating Potential to Emit (PTE) and Other Guidance for Grain Handling Facilities*", the PTE for the CHS Inc. - Macon country grain elevator prior to expansion was calculated based upon multiplying the highest throughput of grain during the previous five calendar years (2010 – 2014) by an adjustment factor of 1.2. A review of the annual throughputs for the last five years showed that the facility experienced the highest grain throughput during calendar year 2011. Actual emissions were also calculated based upon 2011 throughputs.

Note fugitive particulate emissions from unpaved roads were not considered in the overall major source PTE assessment as CHS Inc.'s country grain elevator is not subject to the New Source Performance Standard for Grain Elevators, 40 CFR Part 60, Subpart DD, as total aggregated permanent storage capacity remains less than 2.5 million bushels with the expansion. Country grain elevators below the applicable NSPS facility size threshold need not consider fugitive emissions in such PTE determinations (EPA correspondence from Edward Lillis to Thomas O'Connor at the National Grain and Feed Association, October 14, 1994).

Estimated potential emissions for the grain elevator based upon calendar year 2011 throughput were 132.46 tons of PM, 41.22 tons of PM_{10} and 6.98 tons of $PM_{2.5}$. Separately, potential fugitive emissions (from unpaved roadways) were 29.08 tons of PM, 7.75 tons of PM_{10} and 0.78 tons of $PM_{2.5}$.

Estimated actual emissions from the grain elevator for 2011 were 73.70 tons of PM, 27.43 tons of PM_{10}, and 5.82 tons of $PM_{2.5}$. In addition, actual fugitive particulate emissions from the use of unpaved roadway(s) were estimated to be 26.1 tons of PM, 6.96 tons of PM_{10} and 0.70 tons of $PM_{2.5}$. The fugitive emissions were not adjusted for either days of precipitation or vehicle speed considerations.

With the expansion to approximately 15,000,000 bushels or more throughput per year, the projected potential emissions are estimated to be 161.01 tons for PM, 50.10 tons for PM_{10}, and 8.49 tons for $PM_{2.5}$. Potential fugitive particulate emissions from unpaved roadways are estimated at 35.35 tons of PM, 9.42 tons of PM_{10} and 0.79 tons of $PM_{2.5}$. Note pursuant to EPA guidance for calculating a grain elevator's potential to emit, the facility's after expansion PTE estimate is based upon multiplying the projected annual throughput of around 15,000,000 bushels per year by 1.2 (i.e. 18,000,000).

Projected actual emissions from the expansion factoring control are estimated at 42.20 tons of PM, 20.03 tons of PM_{10}, and 7.07 tons of $PM_{2.5}$. In addition, actual fugitive particulate emissions from the use of unpaved roadway(s) were estimated to be 26.1 tons of PM, 6.96 tons of PM_{10} and 0.70 tons of $PM_{2.5}$. The fugitive emissions were not adjusted for either days of precipitation or vehicle speed considerations.

Air Quality Analysis:

The primary pollutant of concern is particulate matter (PM, PM_{10} and $PM_{2.5}$). The CHS Farmers Elevator - Macon truck to rail country grain elevator facility is located in a rural area east of the City of Wolf Point, Montana and is located in Roosevelt County and within the exterior boundaries of the Fort Peck Reservation (Section 9 of Township 27 North and Range 48 East). According to EPA's Green Book,

Roosevelt County is classified as attainment for PM_{10} and $PM_{2.5}$. In addition, Roosevelt County is also classified as attainment for all other criteria pollutants.

The facility does not currently combust either natural gas, propane or fuel oils for either grain drying or convenience heating purposes. As a result there are no criteria pollutants and greenhouse gases generated from these two sources. On-site mobile sources do combust various vehicular fuels. There are no temporary grain storage areas (outside bunkers) on-site. The roadway is unpaved and comprised of gravel. No grain fumigation is performed on-site at the grain elevator.

This grain handling facility is not classified as a major stationary source based upon the following conclusions:

1. The facility's PTE (Potential to Emit) is less than 100 tons per year for all criteria pollutants.
2. The facility's PTE is less than 10 tons per year for any single Hazardous Air Pollutant and less than 25 tons per year for all Hazardous Air Pollutants combined.
3. The facility's PTE for any other pollutant is less than 250 tons per year.
4. The facility is not located in a non-attainment area for PM_{10} and $PM_{2.5}$.
5. The facility is not currently subject to any New Source Performance Standards including 40 CFR, Part 60, Subpart DD as total permanent storage capacity with expansion will be less than 1.95 million bushels.
6. The facility is not subject to any current NESHAP standards.
7. The source is not a designated EPA Title V source.

The area surrounding the grain elevator is predominantly comprised of agricultural and undeveloped lands. Approximately 0.35 miles to the southwest of the facility is a dry/liquid fertilizer facility (SIC 2875), operated by Ag Partners, LLC (a 50/50 partnership with CHS Inc.). This facility utilizes the same looped railroad track used by the grain elevator, but does not interact business-wise with the grain elevator.

The air quality of the area does realize some minor impacts from the operation of the grain elevator as the facility emits the following pollutants: PM, PM_{10} and $PM_{2.5}$. The air concentration of pollutants is relatively small and seasonal. The corresponding deposition of the particulate matter is minor.

ESA (Endangered Species Act):

Under Section 7 of the ESA Act, it must be determined whether facility activities will affect any listed species or critical habitat, and whether the effect, if any, will have an adverse effect on any land species or critical habitat. A review of the U.S. Fish & Wildlife Service's Environmental Conservation Online System (http://ecos.fws.gov/tess_public/reports/species-by-current-range-county?fips+30085) identified eight (8) species of birds, fish and mammals that are listed for Roosevelt County. These are as follows (Appendix D):

Birds:

1. Whooping crane (Grus Americana)
2. Piping Plover (Charadrius melodus)
3. Least tern (Sterna antillarum)

4. Red knot (Calidris canutus rufa)
5. Sprague's pipit (Anthus spragueii)

Fish:

1. Pallid sturgeon (Scaphirhynchus albus)

Mammals:

1. Gray wolf (Canis lupus)
2. Northern Long-Eared Bat (Myotis septentrionalis)

CHS Inc. has contacted the Fort Peck Reservation regarding the presence of any of these listed species relative to the facility site location. We understand that the Fort Peck Reservation is not aware of any endangered, threatened, recovery or candidate species either on or in the immediate vicinity of the facility. In addition, CHS Inc. is not aware of any known critical habitats or the presence of any affected species on or near the facility site. The closest distance from the grain elevator to the Missouri River is approximately 0.63 miles.

National Historical Preservation Act (NHPA):

Section 106 of the NHPA requires EPA, in consultation with State and/or Tribal Historic Preservation Officers, to ensure that the actions it authorizes are not likely to affect cultural resources. CHS Inc. has reviewed the NHPA website (http://nrhp.focus.nps.gov) and found two sites that are on the National Register of Historic Places located within Roosevelt County and the Fort Peck Reservation. These two sites are the Fort Peck Agency located in Poplar, MT and Hale's Filling Station and Grocery, located near Bainville, MT (Appendix E). Both sites are at significant distances from CHS Inc.'s grain elevator facility located at Macon Junction, MT, which is a rural area. As a result, the operation of this facility has no potential effect on these two historic properties.

APPENDIX A

Process Flow and Equipment Schematics

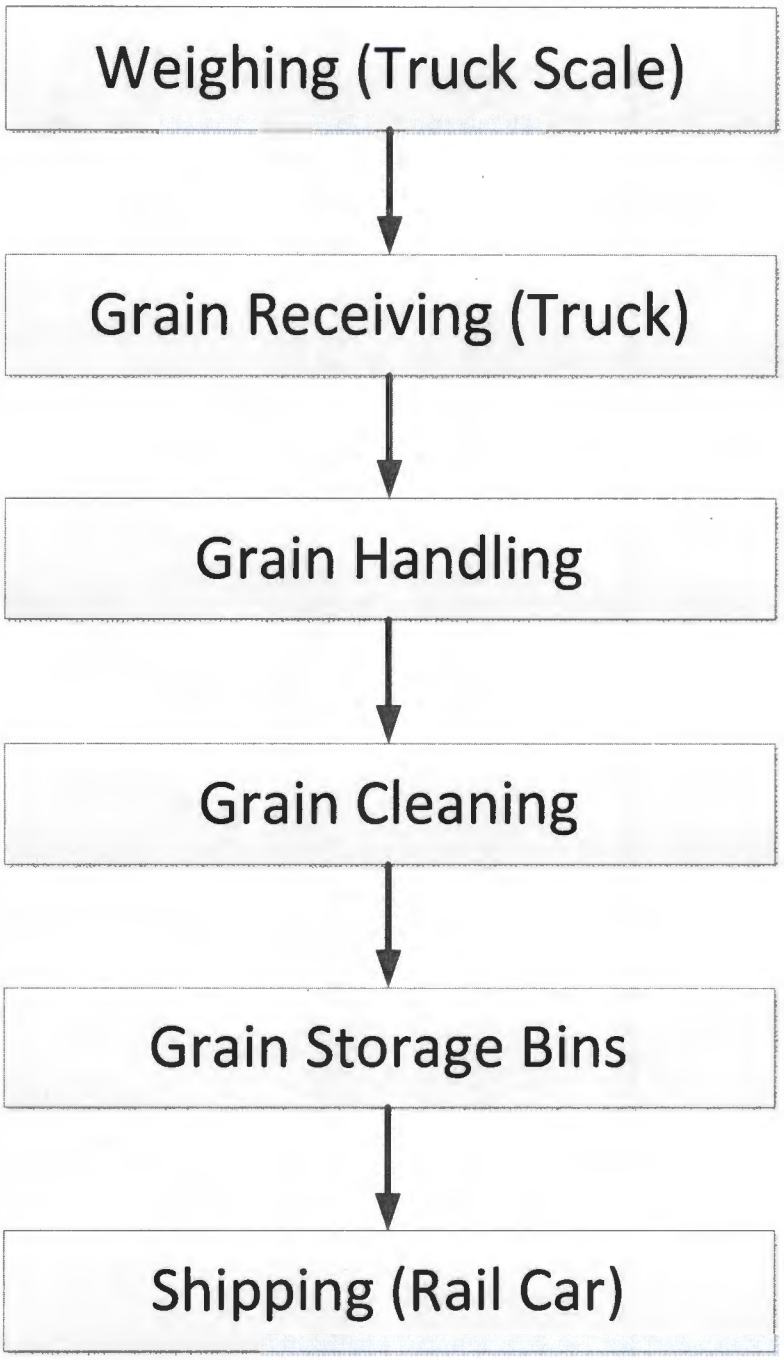
APPENDIX A

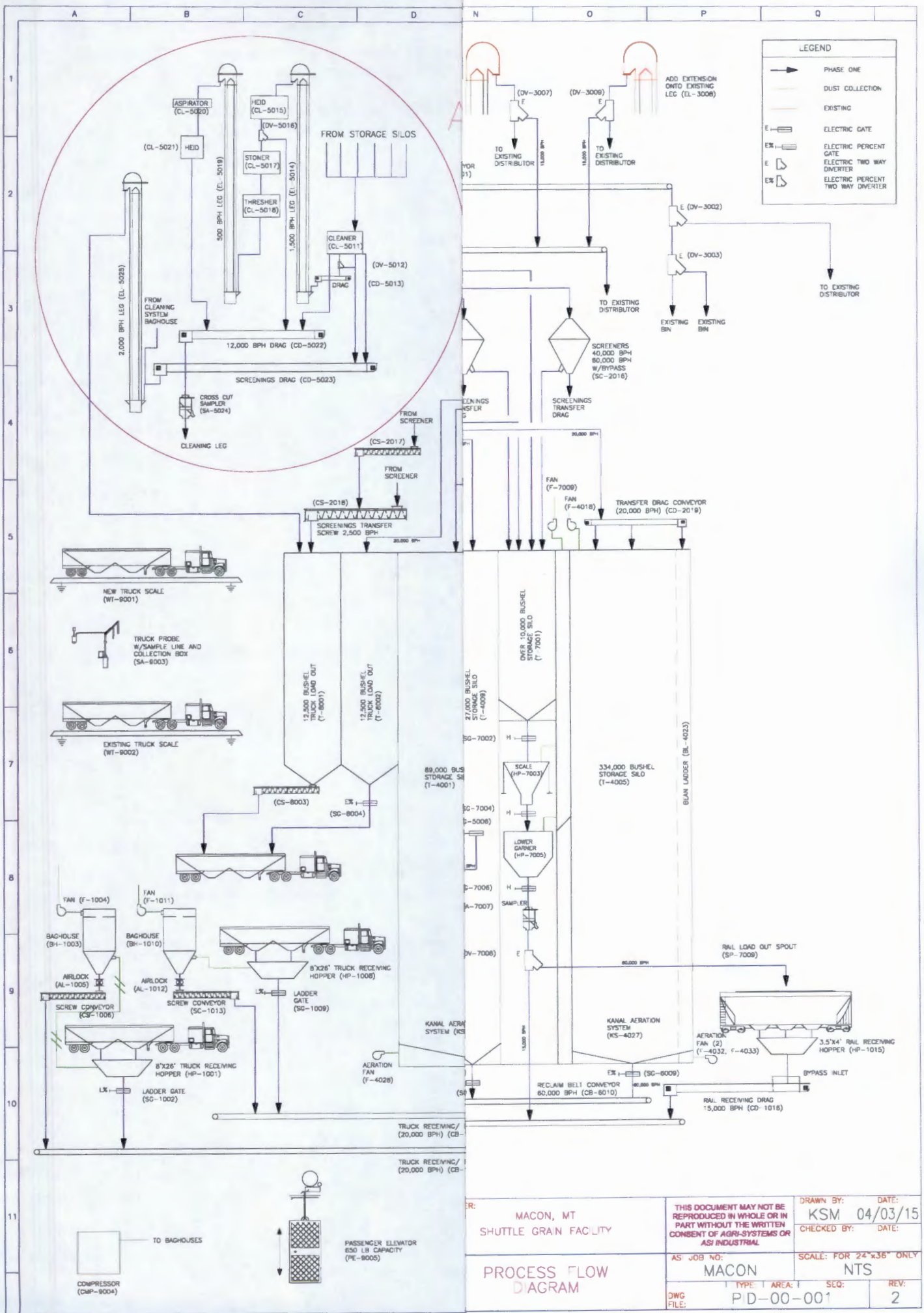
CHS Inc.

dba Farmers Elevator

Macon, MT

Grain Elevator Process Flow



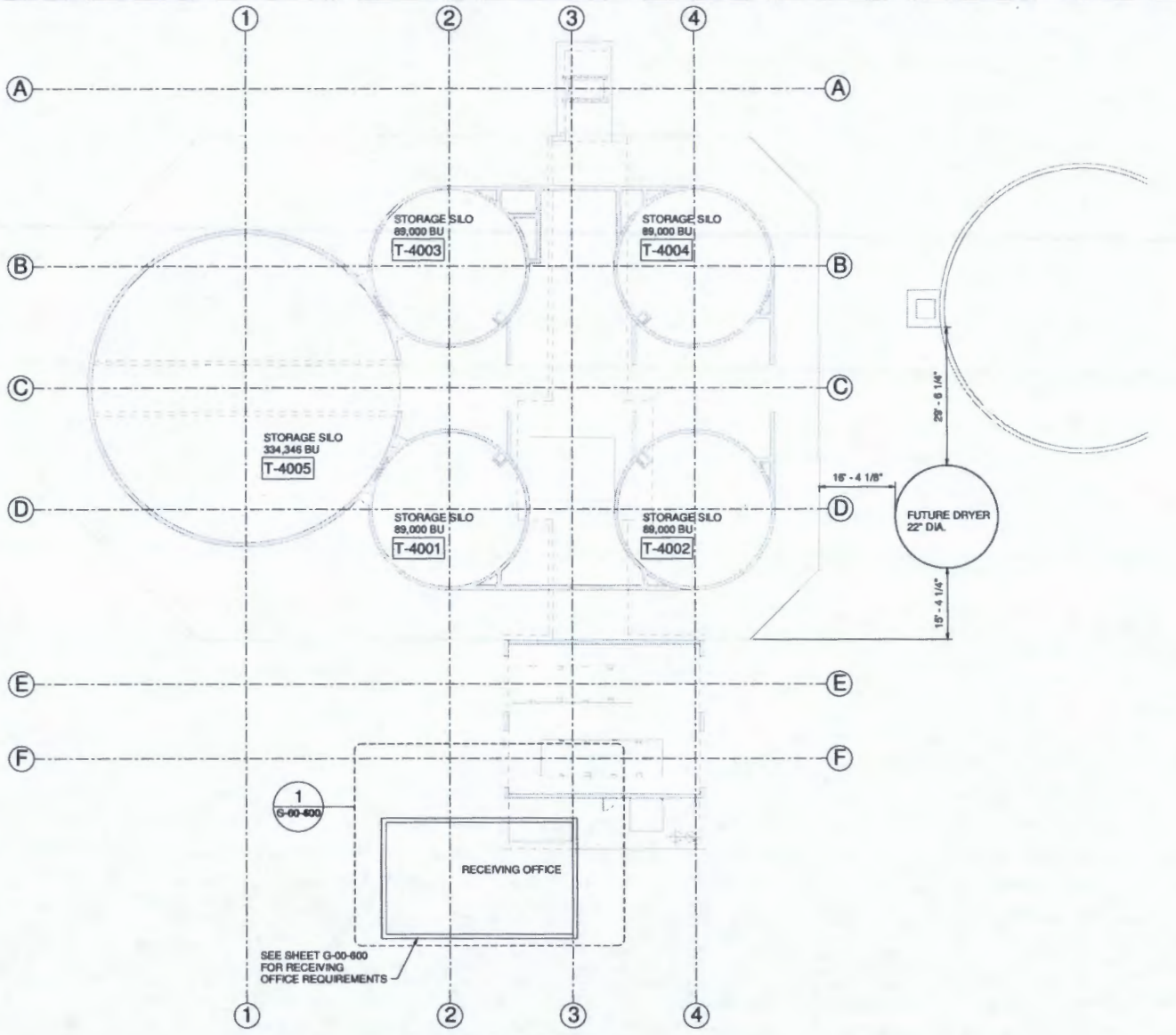


MACON, MT
SHUTTLE GRAIN FACILITY

PROCESS FLOW DIAGRAM

DRAWN BY: KSM DATE: 04/03/15
CHECKED BY: DATE:
ASI JOB NO: MACON
SCALE: FOR 24"x36" ONLY: NTS
DWG FILE: TYPE: P | AREA: I | SEQ: D-00-001
REV: 2

T:\BID\CHS\Macon, MT\P&ID\CHS MACON, MT\PID DWG\PID-00-001 PROCESS FLOW DIAGRAM.dwg



1 RECEIVING OFFICE PLAN
3/32" = 1'-0"

NORTH

DRAWINGS ARE PRINTED HALF SIZE

NO.	DESCRIPTION	DATE
	REVISIONS	

ASI-Industrial
1300 Minnesota Avenue
Billings, Montana 59101
Phone: 406-245-9231
Fax: 406-245-8236
ASI@ASI-INDUSTRIAL.COM

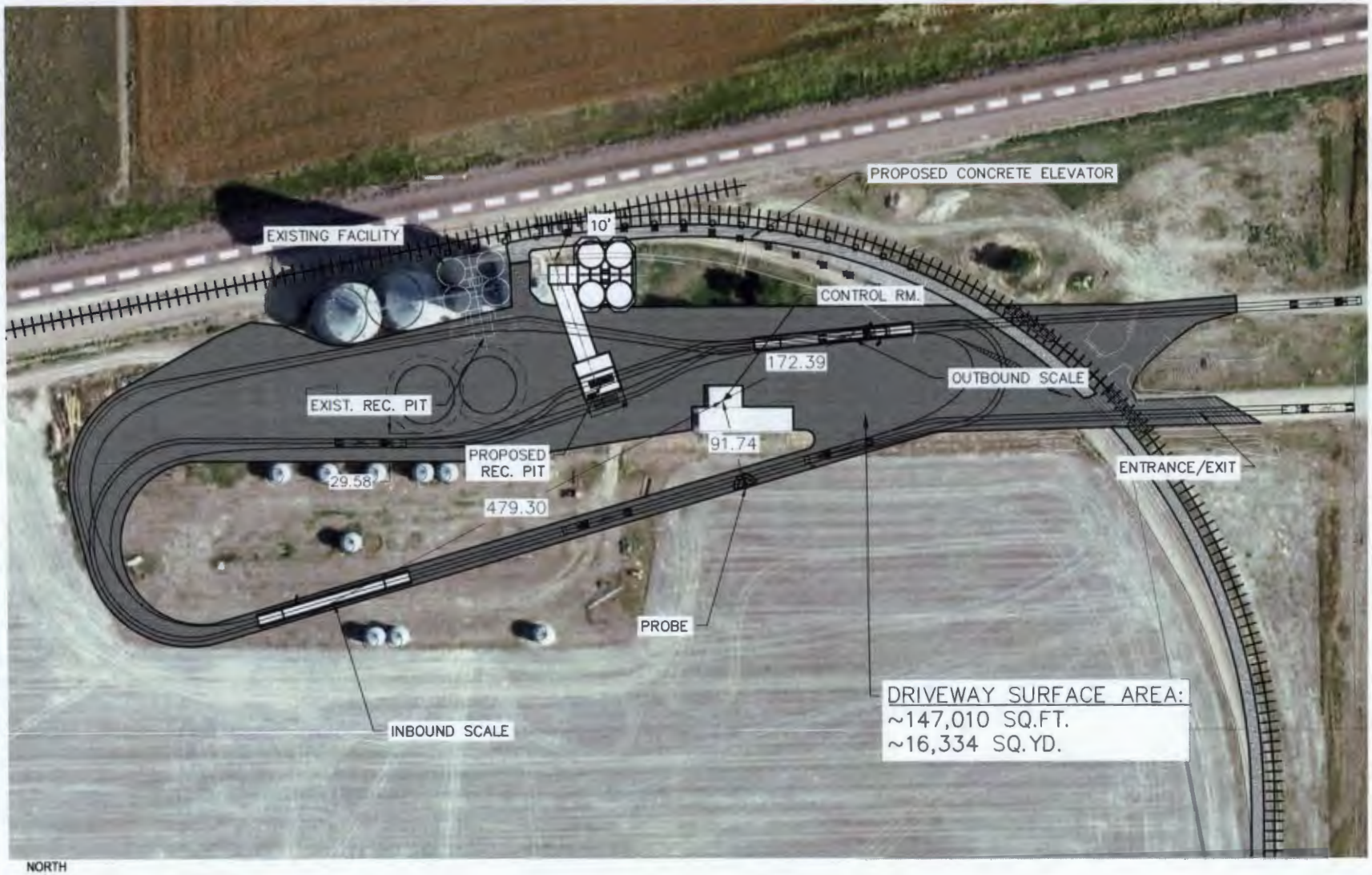
ASI INDUSTRIAL

CHS, Inc.
SHUTTLE TRAIN TERMINAL
MACON, MT

Area 60 Receiving Office Overall Plan

S-60-100

HALF SIZE



NORTH

1 / G2.0 SITE PLAN

1"= 100'

CHS

COUNTRY OPERATIONS
CONSTRUCTION DEPARTMENT
5500 CENEX DRIVE
INVER GROVE HEIGHTS,
MINNESOTA 55077

CHS GRAIN EXPANSION MACON JUNCTION

WOLF POINT, MT 59201

NOT FOR CONSTRUCTION:

ISSUE DATE:	04/10/14
DRAWN BY:	RAC
CHECKED BY:	JLG

PLOT BY: Chernek, Ryan A., PLOT DATE: 06.27.2014 08:12:41
FILE LOCATION: T:\Circle\Construction\Projects\Macon Junction\2014 Grain Expansion\Planning\CAD Files\CHS\Rev0\Macon\M1140410_Grain Expansion-Rev0.dwg

APPENDIX B

Raw Materials Listing

APPENDIX B

CHS - Macon, Montana Country Grain Elevator

CHS - MACON, MT	CY 2010	CY 2011	CY 2012	CY 2013	CY 2014
INBOUND TRUCK					
Spring Wheat	9,431,269.34	11,611,470.26	8,561,644.75	9,159,038.44	10,593,971.19
Winter Wheat	826,124.76	526,852.05	1,299,259.20	925,097.67	533,751.13
Total Bushes	10,257,394.10	12,138,322.31	9,860,903.95	10,084,136.11	11,127,722.32
Total Tons	307,721.82	364,149.67	295,827.12	302,524.08	333,831.67
OUTBOUND RAIL					
Spring Wheat	10,657,372.20	11,943,587.71	10,179,956.31	9,520,245.86	11,438,559.81
Winter Wheat	798,909.11	396,216.89	1,044,506.68	543,341.08	535,112.30
Total Bushes	11,456,281.31	12,339,804.60	11,224,462.99	10,063,586.94	11,973,672.11
Total Tons	343,688.44	370,194.14	336,733.89	301,907.61	359,210.16

Note: bushel weight 60 pounds

APPENDIX C

Criteria Pollutant Emissions

Country Grain Elevator

Sources:
http://www.epa.gov/region07/air/title5/t5memos/grainfnl.pdf
http://www.pca.state.mn.us/air/pubs/5-09.pdf

Year	Bushels	Tons
2011	12,339,805	370,194

To make sure you are using the correct numbers in the emission calculations below, first determine whether your facility is a country elevator or terminal elevator, as defined by the EPA.

	Definition	Capacity	Maximum Capacity
Country elevator	Receives more than 50 percent of its grain from farmers in the immediate vicinity during the harvest season.	Largest amount of grain handled in any of the past five years.	Capacity multiplied by 1.2 to account for the possibility of record harvests or other reasons you might handle more grain than in past years.
Terminal elevator	Receives grain primarily from other elevators.	Maximum amount of grain that could possibly be processed assuming an unlimited supply is available.	Same as capacity.

	Facility Name	Macon, MT		
	Elevator type	Country elevator		Select elevator type from the drop-down list, based on the guidelines above.
Actual	**Capacity**	370,194	tons/year	Enter capacity using the guidelines above.
PTE	**Max. Capacity**	444,233	tons/year	Max. capacity will automatically calculate.

Potential Emissions Based Upon Calendar Year 2011 Throughput (Five Year Highest)

Source unless otherwise noted: EPA AP-42 Chapter 9.9.1

a			b	c	d	e	f	g	h	i	j
Activity			**Maximum Capacity**	**PM Control Efficiency[2]**	**PM Emission Factor**	**PM Emissions**	**PM 10 Control Efficiency[2]**	**PM10 Emission factor**	**PM10 Emissions**	**PM2.5 Emission factor**	**PM2.5 Emissions**
Each activity type (receiving, loadout, etc, except drying) must total the max capacity. If you use multiple methods within an activty, use the method with the higher emission factor for max capacity =			(tons/year) 444,233	(% control)	(lb/ton)	(tons/year) b * d * (1-c) / 2000	(% control)	(lb/ton)	(ton/year) b * f * (1-c) / 2000	(lb/ton)	(ton/year)
Receiving	Hopper truck	0.98	435,348	0%	0.035	7.62	0%	0.0078	1.70	0.0013	0.28
	Straight truck	0.02	8,865	0%	0.18	0.80	0%	0.059	0.26	0.01	0.04
	Rail		0	0%	0.032	0.00	0%	0.0078	0.00	0.0013	0.00
	Barge - continuous unloader		0	0%	0.029	0.00	0%	0.0073	0.00	0.0019	0.00
	Barge - marine leg		0	0%	0.15	0.00	0%	0.038	0.00	0.005	0.00
	Ships		0	0%	0.15	0.00	0%	0.038	0.00	0.005	0.00
Grain Loadout	Truck	0.005	2,221	0%	0.086	0.10	0%	0.029	0.03	0.0049	0.01
	Railcar	0.995	442,012	0%	0.027	5.97	0%	0.0022	0.49	0.00037	0.08
	Barge		0	0%	0.016	0.00	0%	0.004	0.00	0.00055	0.00
	Ship		0	0%	0.048	0.00	0%	0.012	0.00	0.0022	0.00
Headhouse and Grain Handling (legs, conveyors, belts, distributor, scale, enclosed cleaners, etc.)		2.15	955,101	0%	0.061	29.13	0%	0.034	16.24	0.0058	2.77
Grain Cleaning (internal vibrating[1])		1	444,233	0%	0.375	83.29	0%	0.095	21.10	0.016	3.55
Storage Bin (vent)		1	444,233	0%	0.025	5.55	0%	0.0063	1.40	0.0011	0.24
If the max capacity of your grain dryer is smaller than the max capacity of the elevator, you may use the max capacity of the dryer.											0.00
Grain Drying	Rack		0	0%	3	0.00	0%	0.75	0.00	0.13	0.00
	Rack - self-cleaning screen (<50mesh)		0	0%	0.47	0.00	0%	0.12	0.00	0.02	0.00
	Column		0	0%	0.22	0.00	0%	0.055	0.00	0.0094	0.00
Total Emissions						**132.46**			**41.22**		**6.98**

Actual Emissions Based Upon Calendar Year 2011 Throughput (Five Year Highest)

Source unless otherwise noted: EPA AP-42 Chapter 9.9.1

a			b	c	d	e	f	g	h	i	h
Activity			**Actual Throughput**	**PM Control Efficiency[2]**	**PM Emission Factor**	**PM Emissions**	**PM 10 Control Efficiency[2]**	**PM10 Emission factor**	**PM10 Emissions**	**PM2.5 Emission factor**	**PM2.5 Emissions**
Enter actual throughput for each activity type (receiving, loadout, handling, etc).			(tons/year)	(% control)	(lb/ton)	(tons/year) [b * d * (1-c) / 2000]	(% control)	(lb/ton)	(ton/year) [b * f * (1-c) / 2000]	(lb/ton)	(ton/year)
Receiving	Hopper truck	0.98	362,790	48%	0.035	3.30	36%	0.0078	0.91	0.0013	0.24
	Straight truck	0.02	7,404	48%	0.18	0.35	36%	0.059	0.14	0.01	0.04
	Rail		0	0%	0.032	0.00	0%	0.0078	0.00	0.0013	0.00
	Barge - continuous unloader		0	0%	0.029	0.00	0%	0.0073	0.00	0.0019	0.00
	Barge - marine leg		0	0%	0.15	0.00	0%	0.038	0.00	0.005	0.00
	Ships		0	0%	0.15	0.00	0%	0.038	0.00	0.005	0.00
Grain Loadout	Truck	0.005	1,851	0%	0.086	0.08	0%	0.029	0.03	0.0049	0.00
	Railcar	0.995	368,943	0%	0.027	4.97	0%	0.0022	0.41	0.00037	0.07
	Barge		0	0%	0.016	0.00	0%	0.004	0.00	0.00055	0.00
	Ship		0	0%	0.048	0.00	0%	0.012	0.00	0.0022	0.00
Headhouse and Grain Handling (legs, conveyors, belts, distributor, scale, enclosed cleaners, etc.)		2.15	795,917	0%	0.061	24.28	0%	0.034	13.53	0.0058	2.31
Grain Cleaning (internal vibrating[1])		1	370,194	48%	0.375	36.09	36%	0.095	11.25	0.016	2.96
Storage Bin (vent)		1	370,194	0%	0.025	4.63	0%	0.0063	1.17	0.0011	0.20
Grain Drying	Rack		0	0%	3	0.00	0%	0.75	0.00	0.13	0.00
	Rack - self-cleaning screen (<50mesh)		0	0%	0.47	0.00	0%	0.12	0.00	0.02	0.00
	Column		0	0%	0.22	0.00	0%	0.055	0.00	0.0094	0.00
Total Emissions						**73.70**			**27.43**		**5.82**

[1] Emission factor is an average of back-calculated values from AP-42 Table 9.9.1-1 (4/03), which provides a cyclone-controlled emission factor. A cyclone was assumed to be 80% efficient; from MPCA form RP-D2.

[2] Control efficiencies are listed on MPCA form RP-D2 at http://www.pca.state.mn.us/publications/forms/aq-f3-rpd2.doc

Updated April 2012

v. Mar-11

Fugitive Particulate Emissions Based Upon Calendar Year 2011 Throughput (Five Year Highest)

Sources:

Throughput (max capacity) =	444,233	tons/year
Throughput (actual) =	370,194	tons/year
Throughput (actual hauled) =	370,194	tons/year

Unpaved road — Source: AP-42 13.2.2 (11/2006)

		Vehicle 1	Vehicle 2	
k = PM particle size multiplier	4.9			
k_{10} = PM_{10} particle size multiplier	1.5			
$k_{2.5}$= $PM_{2.5}$particle size multiplier	0.15			
s = silt content of road (%)	6			
W = mean vehicle weight (ton)	32.5	100%		**% of total trips**
$V_{potential}$ = # vehicle trips / yr	12,692	15		**Empty weight (tons)**
V_{actual} = # vehicle trips / yr	10,577	50		**Full weight (tons)**
M = miles of unpaved roads	0.52			

Potential Vehicle Miles Traveled (VMT) = $V_{potential}$ x M	6,600
Actual Vehicle Miles Traveled (VMT) = V_{actual} x M	5923
PM emission factor (lb/VMT) = $k(s / 12)^{0.7} (W / 3)^{0.45}$	8.81
PM_{10} emission factor (lb/VMT) = $k(s / 12)^{0.9} (W / 3)^{0.45}$	2.35
PM2.5 emission factor (lb/VMT) = $k(s / 12)^{0.9} (W / 3)^{0.45}$	0.23

Totals

a	b	c	d	e	f
Source	**Emission Factor**	**Potential Activity**	**Potential Emissions** b * c / 2000	**Actual Activity**	**Actual Emissions** b * e / 2000
Unpaved road	(lb/VMT)	(Vehicle miles traveled)	(ton/year)	(Vehicle miles traveled)	(ton/year)
PM	8.81	6600	29.08	5923	26.10
PM10	2.35	6600	7.75	5923	6.96
PM2.5	0.23	6600	0.78	5923	0.70
Material handling	(lb/ton)	(tons)		(tons)	
PM	0.00		0.00		0.00
PM10	0.00		0.00		0.00
Ground pile	(lb/d*acre)	(d*acre)		(d*acre)	
PM	0.00	0	0.00	0.00	0.00
PM10	0.00	0	0.00	0.00	0.00
Total					
PM			**29.08**		**26.10**
PM10			**7.75**		**6.96**
PM2.5			**0.78**		**0.70**

Country Grain Elevator

Sources:
http://www.epa.gov/region07/air/title5/t5memos/grainfnl.pdf
http://www.pca.state.mn.us/air/pubs/5-09.pdf

Year	Bushels	Tons
	15,000,000	450,000

To make sure you are using the correct numbers in the emission calculations below, first determine whether your facility is a country elevator or terminal elevator, as defined by the EPA.

	Definition	Capacity	Maximum Capacity
Country elevator	Receives more than 50 percent of its grain from farmers in the immediate vicinity during the harvest season.	Largest amount of grain handled in any of the past five years.	Capacity multiplied by 1.2 to account for the possibility of record harvests or other reasons you might handle more grain than in past years.
Terminal elevator	Receives grain primarily from other elevators.	Maximum amount of grain that could possibly be processed assuming an unlimited supply is available.	Same as capacity.

	Facility Name	**Macon, MT**		
	Elevator type	Country elevator		Select elevator type from the drop-down list, based on the guidelines above.
Actual	**Capacity**	450,000	tons/year	Enter capacity using the guidelines above.
PTE	**Max. Capacity**	540,000	tons/year	Max. capacity will automatically calculate.

Potential Emissions - With Expansion

Source unless otherwise noted: EPA AP-42 Chapter 9.9.1

a			b	c	d	e	f	g	h	i	j
Activity			**Maximum Capacity**	**PM Control Efficiency[2]**	**PM Emission Factor**	**PM Emissions**	**PM 10 Control Efficiency[2]**	**PM10 Emission factor**	**PM10 Emissions**	**PM2.5 Emission factor**	**PM2.5 Emissions**
Each activity type (receiving, loadout, etc, except drying) must total the max capacity. If you use multiple methods within an activty, use the method with the higher emission factor for max capacity =			(tons/year)	(% control)	(lb/ton)	(tons/year)	(% control)	(lb/ton)	(ton/year)	(lb/ton)	(ton/year)
			540,000			b * d * (1-c) / 2000			b * f * (1-c) / 2000		
Receiving	Hopper truck	0.98	529,200	0%	0.035	9.26	0%	0.0078	2.06	0.0013	0.34
	Straight truck	0.02	10,800	0%	0.18	0.97	0%	0.059	0.32	0.01	0.05
	Rail		0	0%	0.032	0.00	0%	0.0078	0.00	0.0013	0.00
	Barge - continuous unloader		0	0%	0.029	0.00	0%	0.0073	0.00	0.0019	0.00
	Barge - marine leg		0	0%	0.15	0.00	0%	0.038	0.00	0.005	0.00
	Ships		0	0%	0.15	0.00	0%	0.038	0.00	0.005	0.00
Grain Loadout	Truck	0.005	2,700	0%	0.086	0.12	0%	0.029	0.04	0.0049	0.01
	Railcar	0.995	537,300	0%	0.027	7.25	0%	0.0022	0.59	0.00037	0.10
	Barge		0	0%	0.016	0.00	0%	0.004	0.00	0.00055	0.00
	Ship		0	0%	0.048	0.00	0%	0.012	0.00	0.0022	0.00
Headhouse and Grain Handling (legs, conveyors, belts, distributor, scale, enclosed cleaners, etc.)		2.15	1,161,000	0%	0.061	35.41	0%	0.034	19.74	0.0058	3.37
Grain Cleaning (internal vibrating[1])		1	540,000	0%	0.375	101.25	0%	0.095	25.65	0.016	4.32
Storage Bin (vent)		1	540,000	0%	0.025	6.75	0%	0.0063	1.70	0.0011	0.30
If the max capacity of your grain dryer is smaller than the max capacity of the elevator, you may use the max capacity of the dryer.											0.00
Grain Drying	Rack		0	0%	3	0.00	0%	0.75	0.00	0.13	0.00
	Rack - self-cleaning screen (<50mesh)		0	0%	0.47	0.00	0%	0.12	0.00	0.02	0.00
	Column		0	0%	0.22	0.00	0%	0.055	0.00	0.0094	0.00
Total Emissions						**161.01**			**50.10**		**8.49**

Actual Emissions - With Expansion

Source unless otherwise noted: EPA AP-42 Chapter 9.9.1

a			b	c	d	e	f	g	h	i	h
Activity			**Actual Throughput**	**PM Control Efficiency[2]**	**PM Emission Factor**	**PM Emissions**	**PM 10 Control Efficiency[2]**	**PM10 Emission factor**	**PM10 Emissions**	**PM2.5 Emission factor**	**PM2.5 Emissions**
Enter actual throughput for each activity type (receiving, loadout, handling, etc).			(tons/year)	(% control)	(lb/ton)	(tons/year) [b * d * (1-c) / 2000]	(% control)	(lb/ton)	(ton/year) [b * f * (1-c) / 2000]	(lb/ton)	(ton/year)
Receiving	Hopper truck	0.98	441,000	99%	0.035	0.08	93%	0.0078	0.12	0.0013	0.29
	Straight truck	0.02	9,000	99%	0.18	0.01	93%	0.059	0.02	0.01	0.05
	Rail		0	0%	0.032	0.00	0%	0.0078	0.00	0.0013	0.00
	Barge - continuous unloader		0	0%	0.029	0.00	0%	0.0073	0.00	0.0019	0.00
	Barge - marine leg		0	0%	0.15	0.00	0%	0.038	0.00	0.005	0.00
	Ships		0	0%	0.15	0.00	0%	0.038	0.00	0.005	0.00
Grain Loadout	Truck	0.005	2,250	0%	0.086	0.10	0%	0.029	0.03	0.0049	0.01
	Railcar	0.995	447,750	0%	0.027	6.04	0%	0.0022	0.49	0.00037	0.08
	Barge		0	0%	0.016	0.00	0%	0.004	0.00	0.00055	0.00
	Ship		0	0%	0.048	0.00	0%	0.012	0.00	0.0022	0.00
Headhouse and Grain Handling (legs, conveyors, belts, distributor, scale, enclosed cleaners, etc.)		2.15	967,500	0%	0.061	29.51	0%	0.034	16.45	0.0058	2.81
Grain Cleaning (internal vibrating[1])		1	450,000	99%	0.375	0.84	93%	0.095	1.50	0.016	3.60
Storage Bin (vent)		1	450,000	0%	0.025	5.63	0%	0.0063	1.42	0.0011	0.25
Grain Drying	Rack		0	0%	3	0.00	0%	0.75	0.00	0.13	0.00
	Rack - self-cleaning screen (<50mesh)			0%	0.47	0.00	0%	0.12	0.00	0.02	0.00
	Column		0	0%	0.22	0.00	0%	0.055	0.00	0.0094	0.00
Total Emissions						**42.20**			**20.03**		**7.07**

[1] Emission factor is an average of back-calculated values from AP-42 Table 9.9.1-1 (4/03), which provides a cyclone-controlled emission factor. A cyclone was assumed to be 80% efficient; from MPCA form RP-D2.

[2] Control efficiencies are listed on MPCA form RP-D2 at http://www.pca.state.mn.us/publications/forms/aq-f3-rpd2.doc

Updated April 2012

v. Mar-11

Estimated Fugitive Particulate Emissions with Expansion to 15,000,000 Bushels per Year

Throughput (max capacity) =	540,000	tons/year
Throughput (actual) =	450,000	tons/year
Throughput (actual hauled) =	450,000	tons/year

Unpaved road — Source: AP-42 13.2.2 (11/2006)

		Vehicle 1	Vehicle 2	
k = PM particle size multiplier	4.9			
k_{10} = PM_{10} particle size multiplier	1.5			
$k_{2.5}$ = $PM_{2.5}$ particle size multiplier	0.15			
s = silt content of road (%)	6			
W = mean vehicle weight (ton)	32.5	100%		% of total trips
$V_{potential}$ = # vehicle trips / yr	15,429	15		Empty weight (tons)
V_{actual} = # vehicle trips / yr	12,857	50		Full weight (tons)
M = miles of unpaved roads	0.52			

Potential Vehicle Miles Traveled (VMT) = $V_{potential}$ x M	8023
Actual Vehicle Miles Traveled (VMT) = V_{actual} x M	6686
PM emission factor (lb/VMT) = $k(s / 12)^{0.7} (W / 3)^{0.45}$	8.81
PM_{10} emission factor (lb/VMT) = $k(s / 12)^{0.9} (W / 3)^{0.45}$	2.35
PM_{10} emission factor (lb/VMT) = $k(s / 12)^{0.9} (W / 3)^{0.45}$	0.23

Totals

a	b	c	d	e	f
Source	**Emission Factor**	**Potential Activity**	**Potential Emissions** b * c / 2000	**Actual Activity**	**Actual Emissions** b * e / 2000
Unpaved road	(lb/VMT)	(Vehicle miles traveled)	(ton/year)	(Vehicle miles traveled)	(ton/year)
PM	8.81	8023	35.35	6686	29.46
PM10	2.35	8023	9.42	6686	7.85
PM2.5	0.23	6686	0.79	6686	0.79
Material handling	(lb/ton)	(tons)		(tons)	
PM	0.00		0.00		0.00
PM10	0.00		0.00		0.00
Ground pile	(lb/d*acre)	(d*acre)		(d*acre)	
PM	0.00	0	0.00	0.00	0.00
PM10	0.00	0	0.00	0.00	0.00
Total					
PM			**35.35**		**29.46**
PM10			**9.42**		**7.85**
PM2.5			**0.79**		**0.79**

APPENDIX D

Endangered Species Act

Appendix D

U.S. Fish & Wildlife Service

Environmental Conservation Online System
Conserving the Nature of America
Enter Search Term(s):

Search

- ECOS>
- Species Reports>
- Species By County Report

Species By County Report

The following report contains Species that are known to or are believed to occur in this county. Species with range unrefined past the state level are now excluded from this report. If you are looking for the Section 7 range (for Section 7 Consultations), please visit the IPaC application.

County: Roosevelt, MT

Group	Name	Population	Status	Lead Office	Recovery Plan Name	Recovery Plan Action Status	Recovery Plan Stage
Birds	Whooping crane (*Grus americana*)	except where EXPN	Endangered	Assistant Regional Director-Ecological Services	Whooping Crane Recovery Plan, Final Third Revision	Implementation Progress	Final Revision 3
	Piping Plover (*Charadrius melodus*)	except Great Lakes watershed	Threatened	Office of the Regional Director	Piping Plover Atlantic Coast Population Revised Recovery Plan	Implementation Progress	Final Revision 1
					Great Lakes & Northern Great Plains Piping Plover	Implementation Progress	Final
	Least tern (*Sterna antillarum*)	interior pop.	Endangered	Mississippi Ecological Services Field Office	Least Tern (Interior Pop.)	Implementation Progress	Final
	Red knot (*Calidris canutus rufa*)		Threatened	New Jersey Ecological Services Field Office	-	-	-

Group	Name	Population	Status	Lead Office	Recovery Plan Name	Recovery Plan Action Status	Recovery Plan Stage
	Sprague's pipit (*Anthus spragueii*)		Candidate	Assistant Regional Director-Ecological Services	-	-	-
Fishes	Pallid sturgeon (*Scaphirhynchus albus*)	Entire	Endangered	Northern Rockies Fish and Wildlife Conservation Office	Final Revised Recovery Plan for the Pallid Sturgeon (Scaphirhynchus albus)	Implementation Progress	Final Revision 1
Mammals	Gray wolf (*Canis lupus*)	Northern Rocky Mountain DPS	Recovery	Office of the Regional Director	-	-	-
	Northern Long-Eared Bat (*Myotis septentrionalis*)		Threatened	Twin Cities Ecological Services Field Office	-	-	-

Export options: CSV | EXCEL | XML | PDF

APPENDIX E

National Historical Preservation Act

nps.gov

National Park Service
U.S. Department of the Interior

National Register of Historic Places

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Fort Peck Agency [Image]

URL:	http://pdfhost.focus.nps.gov/docs/NRHP/Text/70000365.pdf Link will open in a new browser window
URL:	http://pdfhost.focus.nps.gov/docs/NRHP/Photos/70000365.pdf Link will open in a new browser window
Publisher:	National Park Service
Published:	05/19/1970
Access:	Public access
Restrictions:	All Rights Reserved
Format/Size:	Physical document with text, photos and map
Language:	eng: English
Note:	In Poplar
Item No.:	70000365 *NRIS (National Register Information System)*
Subject:	EVENT
Subject:	COMMERCE
Subject:	MILITARY
Subject:	SITE
Subject:	1900-1924
Subject:	1875-1899
Keywords:	1877
Place:	MONTANA -- Roosevelt County -- Poplar

Record Number: 360693

Record Owner: National Register of Historic Places

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National Park Service
U.S. Department of the Interior

National Register of Historic Places

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Hale's Filling Station and Grocery [Image]

URL:	http://pdfhost.focus.nps.gov/docs/NRHP/Text/94000864.pdf Link will open in a new browser window
URL:	http://pdfhost.focus.nps.gov/docs/NRHP/Photos/94000864.pdf Link will open in a new browser window
Publisher:	National Park Service
Published:	08/16/1994
Access:	Public access
Restrictions:	All Rights Reserved
Is Part Of:	Roadside Architecture Along US 2 in Montana MPS
Format/Size:	Physical document with text, photos and map
Language:	eng: English
Note:	Lanark Townsite
Item No.:	94000864 *NRIS (National Register Information System)*
Subject:	EVENT
Subject:	ARCHITECTURE/ENGINEERING
Subject:	ARCHITECTURE
Subject:	COMMERCE
Subject:	BUILDING
Subject:	1925-1949
Keywords:	Hale,Lloyd;1928
Place:	MONTANA -- Roosevelt County -- Bainville vicinity

Record Number: 421724

Record Owner: National Register of Historic Places

APPENDIX F

Facility Site Location Maps and Aerial

REGIONAL MAP OF NORTHEASTERN MONTANA SHOWING THE LOCATION OF MACON, MT

AERIAL VIEW OF MACON, MT AND SURROUNDING AREA SHOWING THE PROPOSED SITE OF MACON TERMINAL

Google earth

feet 3000
km 1