STATE OF WASHINGTON DEPARTMENT OF ECOLOGY
PRELIMINARY DETERMINATION

IN THE MATTER OF APPROVING A NEW CONTAMINANT SOURCE FOR **EASTERDAY RANCHES N. FEEDLOT**	)))	Preliminary Determination of Approval Number 13AQ-E484

TO: Mr. Cody Easterday, President
Easterday Ranches, Inc.
5235 N. Industrial Way
Pasco, Washington 99301

Equipment Evaluated for this determination of approval consists of the following:

1. Hay Processing Facility with the following:
    a. 1-Cooper Equipment Company Model 840 Bale Shredder, 50 ton/hr max
    b. 1-Cooper Equipment Company Shredder Discharge Conveyor, 4 ft wide by 65 ft long, enclosed
    c. 1-Processed Hay Storage Building, 30 ft deep by 25 ft wide by 24 ft high
    d. 1-Donaldson/Torit Dust Collector, Model CPV-12, Controlling shredder, shredder discharge conveyor, and drawing air from the storage building: 8200 cfm max, 756 ft2 cloth area, 0.001 gr/dscf (filterable plus condensible)
2. Feed Mill Modifications with the following:
    a. 2-Stationary Feed Mixers, Roto-Mix Model 720-16
    b. 2-Mixer Discharge Conveyors, 4 ft wide by 35 ft long, enclosed with drop tube shrouding for mixed feed load-out.
3. Grain Mill with the following:
    a. 10 ft by 10 ft Receiving Pit with an enclosed conveyor to the primary elevator leg.
    b. Primary Elevator leg (enclosed) with enclosed distributor to 4 bins.
    c. 2-35,000 Bushel Bins with a common vent filter and enclosed conveyor to secondary elevator leg.
    d. 2-8,000 Bushel Hoppers with a common bin vent filter and enclosed conveyor to secondary elevator leg.
    e. Secondary Distributor (enclosed) delivering grain from the 8,000 Bushel Hoppers and secondary elevator to a pair of enclosed Scalpers.
    f. Two enclosed scalpers which drop grain to an enclosed hot water mixing conveyor and foreign material scalped from the grain to a 1,500 Bushel under- and over-size storage bin (Scalper rejects hopper)
    g. One steam cabinet.

h. Steam flaking rollers which drop wet flaked grain into a 3-sided roofed structure for mixing to the desired nutrient composition (the Feed Mixing Area).
i. Cleaver Brooks Boiler, Model #CB(LE)-700-200-150, rated for a maximum of 8,136,000 BTU/hr input firing natural gas, 7,934,000 BTU/hr input firing LPG
j. Feed mill emergency engine generator (specifics to be determined)
k. Water reservoir emergency engine generator (specifics to be determined)

4. 115 acre feed lot: 26,000 head capacity with automated sprinkler and cross fencing systems.

DETERMINATIONS

In relation to the above equipment and the evaluation outlined in the Technical Support Document associated with this Order, the Department of Ecology, State of Washington, pursuant to RCW 70.94.152, WAC 173-400-110, and WAC 173-460-040, makes the following determinations:

1. The proposed new source of air contaminants, if operated as herein required, will be in accordance with applicable rules and regulations, as set forth in Chapter 173-400 WAC and 173-460 WAC and the operation thereof, at the location proposed, will not result in ambient air quality standards being exceeded.

2. The proposed modifications and changes, if operated as herein required, will provide all known, available, and reasonable methods of emission control.

THEREFORE, IT IS ORDERED that the project as described in the Notice of Construction application and more specifically detailed in plans, specifications, and other information submitted to Ecology is approved for construction and operation, provided the following conditions are satisfied:

APPROVAL CONDITIONS

1. Administrative: Upon issuance of this approval order, Approval Order No. 12AQ-E477 is rescinded and replaced by the evaluation and conditions contained herein.

2. Compliance Schedule: Emergency Engine-generators for the feed mill and the water reservoir pump:

a. No later than December 1, 2014, Easterday Ranches, Inc. shall have identified emergency engines, compliant with 40 CFR 60 Subpart IIII, for the feed mill and for the water reservoir pump.

b. No later than May 1, 2015, Easterday Ranches shall have contracted for the purchase of the engines identified in Condition 2a.
c. No later than December 1, 2015, Easterday Ranches shall have installed the engines identified in Condition 2a.
d. No later than January 1, 2016, Easterday Ranches shall have removed the engines non-compliant with 40 CFR 60, Subpart IIII from service.

3. Construction Activities- Control of Fugitive Dust
a. During construction of the lot and buildings and infrastructure, no more than 14 acres of bare earth shall be exposed at any one time, and this shall be watered sufficiently to prevent fugitive dust from becoming airborne.
b. After earthmoving is complete on any 14 acres or smaller daily disturbance of earth, the surface shall be covered with straw mulch prior to disturbing any new areas. The straw mulch cover shall be watered as necessary to prevent it from becoming airborne.

4. Facility-Wide:
a. Easterday shall maintain current and legal authorization for sufficient water for stock cooling, dust control, and other associated feedlot uses.
b. Post-construction-Control of Fugitive Dust
i. During operation of the feedlot, Easterday shall follow the fugitive dust control plan submitted to Ecology on February 9, 2009, and modified annually in accordance with the facility Operations and Maintenance (O&M) Plan. Fugitive dust control measures shall be sufficient to prevent fugitive dust from crossing the Easterday property line.

5. Hay Processing
a. The bale shredder shall process no more than 36,500 tons per year.
b. The bale shredder shall operate no more than 730 hours in any 12 month period.
c. The bale shredder in-feed area shall be watered or otherwise controlled to prevent fugitive dust emissions (zero, 0 percent opacity).
d. Hay processing conveyors, transfer points, and the hay storage building shall be enclosed to prevent fugitive dust emissions (zero, 0 percent opacity).
e. Hay transfer from the hay storage building to the mixers shall be controlled to prevent fugitive emissions (zero, 0 percent opacity). The transfer activity shall be added into the facility fugitive dust control plan.
f. The dust collector exhaust shall not exceed five (5) percent opacity in any 3 minute period.

6. Feed Mill
a. Receiving of dry grain shall be limited to 45,000 tons per year, and shall be received in a shrouded choke-style pit operated without fugitive dust.

b. All conveyors and transfer points shall be enclosed to prevent fugitive dust
c. All storage hoppers (primary and secondary hoppers) shall be controlled with bin vent filters.
d. The feed mill scalpers, distributors, and the scalper rejects hopper shall be enclosed to prevent fugitive dust
e. Grain processed in the flaking rolls shall be sufficiently moistened to prevent the generation of fugitive dust.
f. The feed mixers and the mixer loadout conveyors and drop spouts shall be operated with no visible emissions (zero, 0 percent opacity).
g. The Cleaver Brookes Boiler shall be fueled exclusively with natural gas or propane.
h. The Cleaver Brookes Boiler shall fire no more than 19,980 mmBTU of gaseous fuels (natural gas and propane) in any calendar year.
i. The boiler exhaust shall be limited to the following pollutant concentrations and mass emission limits:
    i. Natural Gas:
        1. NOx: 9ppmv @ 3%O_2, 0.12 lb/hr
        2. CO 50 ppmv@3%O_2, 0.45 lb/hr
    ii. LPG:
        1. NOx:13ppmv@3%O_2, 0.19 lb/hr
        2. CO:50ppmv@3%O_2, 0.46 lb/hr
j. The emergency engine generator providing power to the feed mill in case of line power failure shall be fueled with ultra-low sulfur diesel (15 ppmw S). Fuel sulfur certifications shall be retained for each delivery of diesel, and made available to Ecology on request.
k. The emergency engine generator providing power to the feed mill in case of line power failure shall be operated only during line power outage and for reliability and maintenance testing (expected to be approximately 12 hours per year) required to maintain the engine warrantee.

7. FEED LOT

a. The emergency engine generator providing power to the water system pump in case of line power failure shall be fueled with ultra-low sulfur diesel (15 ppmw S). Fuel sulfur certifications shall be retained for each delivery of diesel, and made available to Ecology on request.
b. The emergency engine generator providing power to the water system pump in case of line power failure shall be operated only during line power outage and for

reliability and maintenance testing (expected to be approximately 12 hours per year) required to maintain warrantee.

c. At no time shall the number of cattle being fed at this facility exceed 26,000.
d. The operating feed lot shall be equipped with a portable electric pen divider cross fencing system to be used when water for dust control is not sufficient.
e. The operating feed lot shall be equipped with a computer controlled sprinkler system capable of watering all pens of the lot in 80 minutes or less with 71,500 gallons. The sprinkler system shall be designed to function with the electric pen divider system required in Condition 7d above.
f. Best Management Practices (BMPs) for manure management and lagoon odor control shall be identified in the Operations and Maintenance manual required by Condition 11 of this approval.

8. MONITORING REQUIREMENTS

a. The hay processing dust collector shall be equipped with properly maintained filter failure instrumentation (magnehelic or other manufacturer's recommended instrument) that produces an audible or visible filter failure indication in a location where operators are present during operation.
b. The hay shredder shall be equipped with a properly maintained hours meter to indicate hours of shredder operation.
c. At least once per week during periods of operation of the bale shredder and feed mixers, a visible emission survey (using EPA Method 22) shall be conducted of the bale infeed area, the hay transfer to the feed mill, the feed mixing area, and the feed truck loading area.
d. Pen floor pH shall be monitored using a Turf Tech Soil pH meter or equivalent. pH shall be monitored at 4 randomly selected locations in each active pen, away from corners or other dead spots. pH of the pen floors shall be monitored on a frequency defined in the O&M Manual.
e. pH of the lagoons shall be monitored with litmus paper and amended as necessary on a frequency defined in the O&M Manual.
f. Moisture content of the manure pack shall be monitored using a soil moisture meter in conjunction with the pH monitoring, and visually to locate wet or dry spots requiring correction.
g. Manure pack depth shall be measured on a frequency defined in the O&M Manual with a Hori Hori soil knife or equivalent. Monitoring shall be done at the same time as moisture and pH is monitored.
h. The fuel type and amount combusted each calendar month in the Cleaver Brooks boiler shall be monitored using procedures approved by Ecology.

9. RECORDKEEPING REQUIREMENTS

a. Records shall be maintained of all monitoring data including number of cattle on-site, dates when pens are scraped, pH, moisture, and manure pack depth. The monitoring data shall be provided to Ecology on request.
b. Records of the details of the animal dietary manipulation shall be maintained and provided to Ecology on request.
c. Records shall be maintained of the date, time, and observations made during the visible emission surveys required in Condition 7.b. above. The survey records shall be made available to Ecology on request.
d. At least weekly records shall be maintained of the hours of operation of the hay shredder and the tons processed by the shredder. These records shall be made available to Ecology on request.
e. Records of the fuel type and amount combusted each calendar month in the Cleaver Brooks boiler shall be maintained. These records shall be made available to Ecology on request.

10. REPORTING REQUIREMENTS

a. Easterday Ranches, Inc. shall provide notification to Ecology upon completing each of the actions required in Condition 2a through d for the emergency generators. Completion of the requirement in each sub-condition of Condition 2 shall be reported to Ecology as it occurs.

11. OPERATION AND MAINTENANCE MANUALS

A site-specific O&M manual for the boiler, bin vent filters, hay processing filter, feedlot sprinklers and cross fencing systems, and monitoring equipment, monitoring procedures, and monitoring schedules for the feedlot BACT (BMPs) measures shall be developed and followed. The manual shall be prepared within 60 days of the issuance date of this approval.

The manual shall be reviewed no less frequently than annually, and updated as necessary. Manufacturers' operating instructions and design specifications for the emergency generators, boiler, feed mill and hay processing equipment shall be included in the manual.

The O&M manual shall be updated to reflect any modifications of the equipment or operating or maintenance or monitoring procedures. Emissions that result from failure to follow the operating procedures contained in the O&M manual or manufacturer's operating instructions may be considered proof that the equipment was not properly installed, operated, and/or maintained. The O&M manual shall at a minimum include:

a. Normal equipment operating parameters and design specifications.
b. Maintenance schedules.
c. Monitoring procedures and schedules.
d. The feedlot fugitive dust control plan.
e. The current Manure Management Plan (MMP) with, at a minimum, the following:
    i. pH targets and corrective measures for lagoons and manure pads;
    ii. Moisture targets and corrective measures for the manure pads;
    iii. Manure pad depth targets and corrective measures;
    iv. Controlled nutrient feeding targets and corrective measures.
f. Actions to be taken in the event of a hay processing dust collector filter failure.
g. Actions to be taken in the event of non-zero visible emission survey observations.

12. SUBMITTALS

All notifications, reports, and other submittals shall be sent to:

Washington State Department of Ecology
Air Quality Program
4601 N. Monroe Street
Spokane, WA 99205-1295

11. REPORTING

The following information will be submitted to the AQP at the address in Condition 12 above by January 31 of each calendar year.

a. Annual summary of air contaminant emissions, annual total of boiler fuel consumed, annual feed mill throughput, annual average number of animals on-site and annual total hours of operation.
b. Written notification that the O&M manual has been developed and completed within 60 days after the issuance of this Order.

12. GENERAL CONDITIONS

a. **Commencing/Discontinuing Construction and/or Operations:** This approval shall become void if the construction of this facility is discontinued for a period of eighteen (18) months, unless prior written notification is received by Ecology at the address in Condition 12 above.
b. **Compliance Assurance Access:** Access to the source by representatives of Ecology or the EPA shall be permitted upon request. Failure to allow such access is grounds for enforcement action under the federal Clean Air Act or the Washington State Clean Air Act, and may result in revocation of this Approval Order.

c. **Availability of Order and O&M Manual:** Legible copies of this Order and the O&M manual shall be available to employees in direct operation of the feedlot and mill equipment, and be available for review upon request by Ecology.
d. **Equipment Operation:** Operation of the feedlot and mill equipment shall be conducted in compliance with all data and specifications submitted as part of the NOC application and in accordance with the O&M manual, unless otherwise approved in writing by Ecology.
e. **Modifications:** Any modification to the project, contrary to information in the NOC application, shall be reported to Ecology at least 60 days before such modification. Such modification may require a new or amended NOC Approval Order.
f. **Activities Inconsistent with the NOC Application and this Approval Order:** Any activity undertaken by the permittee or others, in a manner that is inconsistent with the NOC application and this determination, shall be subject to Ecology enforcement under applicable regulations.
g. **Obligations under Other Laws or Regulations:** Nothing in this Approval Order shall be construed to relieve the permittee of its obligations under any local, state or federal laws or regulations.
h. **Fees:** Per WAC 173-400-116, this Preliminary Determination and related regulatory requirements have a fee associated for review and issuance.

All plans, specifications, and other information submitted to the Department of Ecology relative to this project and further documents and any authorizations or approvals or denials in relation thereto shall be kept at the Eastern Regional Office of the Department of Ecology in the "Air Quality Controlled Sources" files, and by such action shall be incorporated herein and made a part thereof.

Nothing in this approval shall be construed as obviating compliance with any requirement of law other than those imposed pursuant to the Washington Clean Air Act and rules and regulations thereunder.

A one-month testing and break-in period is allowed, after any part or portion of this project becomes operational, to make any changes or adjustments required to comply with applicable rules and regulations pertaining to air quality and conditions of operation imposed herein. Thereafter, any violation of such rules and regulations or of the terms of this approval shall be subject to the sanctions provided in Chapter 70.94RCW.

Authorization may be modified, suspended or revoked in whole or part for cause including, but not limited to the following:

a. Violation of any terms or conditions of this authorization;

b. Obtaining this authorization by misrepresentation or failure to disclose fully all relevant fact.

The provisions of this authorization are severable and, if any provision of this authorization, or application of any provisions of their circumstances, and the reminder of this authorization, shall not be affected thereby.

You have a right to appeal this Approval Order. To appeal this you must:

- File your appeal with the Pollution Control Hearings Board within 30 days of the "date of receipt" of this document. Filing means actual receipt by the Board during regular office hours
- Serve your appeal on the Department of Ecology within 30 days of the "date of receipt" of this document. Service may be accomplished by any of the procedures identified in WAC 371-08-305(10). "Date of receipt" is defined at RCW 43.21B.001(2).

Be sure to do the following:

- Include a copy of (1) the permit you are appealing and (2) the application for the permit.
- Serve and file your appeal in paper form; electronic copies are not accepted.

1. To file your appeal with the Pollution Control Hearings Board

Mail appeal to:
The Pollution Control Hearings Board
PO Box 40903
Olympia WA 98504-0903

OR

Deliver your appeal in person to:
The Pollution Control Hearings Board
4224 – 6th Ave SE Rowe Six, Bldg 2
Lacey, WA 98503

2. To serve your appeal on the Department of Ecology

Mail appeal to:
Pollution Control Hearings Board
1111 Israel Rd SW
STE 301
Tumwater, WA 9850 1

OR

Deliver your appeal in person to:
The Department of Ecology
Appeals Coordinator
300 Desmond Dr SE
Lacey, WA 98503

3. And send a copy of your appeal to:

Karen K. Wood
Department of Ecology
Eastern Regional Office
4601 N. Monroe Street
Spokane, WA 99205-1295

DATED at Spokane, Washington this day of June, 2014.

PREPARED BY:

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