

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY
PRELIMINARY DETERMINATION
NOTICE OF CONSTRUCTION

IN THE MATTER OF APPROVING A NEW)
CONTAMINANT SOURCE FOR) **Preliminary Determination**
EASTERDAY RANCHES N. FEEDLOT)

TO: Mr. Cody Easterday, President
Easterday Ranches, Inc.
1816 N. 20th Ave
Pasco, Washington 99301

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

- 1- Feed 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. 1-Cleaver Brooks Boiler, Model #CBLE-NTI-300-1505T, rated for 12,247,000 BTU/hr input, firing natural gas exclusively no more than 2,500 hours per year.
- 2- 1- 115 acre feed lot: 30,000 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. 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.
 - c. Any change to the phased construction schedule and dust control plan proposed in the application materials submitted on January 2, 2009, shall be submitted for review and approval by Ecology.
2. 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 . Fugitive dust control measures shall be sufficient to prevent fugitive dust from crossing the Easterday property line.
3. Feed Mill
 - a. Receiving of dry grain shall be limited to 24,000 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 Cleaver Brookes Boiler shall be fueled exclusively with natural gas or propane.
 - g. The Cleaver Brookes Boiler shall fire no more than 30,618 mmBTU of gaseous fuels (natural gas and propane) in any calendar year.
 - h. The boiler exhaust shall be limited to the following pollutant concentrations and mass emission limits:
 - i. Natural Gas:
 - 1. NOx: 9ppmv @ 3%O₂, 0.12 lb/hr
 - 2. CO 50 ppmv@3%O₂, 0.45 lb/hr
 - ii. LPG:
 - 1. NOx:13ppmv@3%O₂, 0.19 lb/hr
 - 2. CO:50ppmv@3%O₂, 0.46 lb/hr
4. Feed Lot
- a. 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.
 - b. 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 3a above.
 - c. The manure pack and lagoon pH shall be maintained at or below pH 8 by the addition of citric acid, hydrogen peroxide, and calcium carbonate.
 - d. The manure pack moisture shall be maintained in the range of 25 to 34% by the computer controlled application of water from the sprinklers, changing scraping frequency, and repair of leaking water piping.
 - e. The active pen manure pack depth shall be maintained at an average of 2 inches by scraping every 3 weeks.
 - f. The 2 inch manure pack shall be aerated in conjunction with the scraping in e, above.
 - g. The feed mixed for the cattle at this feed lot shall deliver a controlled nutrient dosage to minimize excreted nutrients and maximize feed availability to the animals.

5. MONITORING REQUIREMENTS

- a. 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 every other week except when ice is present on the ground.

- b. pH of the lagoons shall be monitored with litmus paper any time standing water is present, except when the surface is frozen. pH will be amended using chemicals such as hydrogen peroxide and calcium carbonate.
- c. 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.
- d. Manure pack depth shall be measured with a Hori Hori soil knife or equivalent. Monitoring shall be done at the same time as moisture and pH is monitored and every other week during periods of high ambient moisture.
- e. The fuel type and amount combusted each calendar month in the Cleaver Brooks boiler shall be monitored using procedures approved by Ecology.

6. RECORDKEEPING REQUIREMENTS

- a. Records shall be maintained of all monitoring data including 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 of the fuel type and amount combusted each calendar month in the Cleaver Brooks boiler shall be maintained.

7. REPORTING REQUIREMENTS

- a. Easterday Ranches, Inc. shall provide the following notification for the Cleaver Brooks boiler to Ecology as required by 40 CFR 60 Subpart Dc:
 - i. The date of construction of the boiler;
 - ii. The date start-up is anticipated;
 - iii. The date start-up occurs;
 - iv. The design heat input capacity; and
 - v. Identification of the fuels to be burned.

8. OPERATION AND MAINTENANCE MANUALS

A site-specific O&M manual for the boiler, bin vent filters, feedlot sprinklers and cross fencing systems, and monitoring equipment for the feedlot BACT measures shall be developed and followed. Manufacturers' operating instructions and design specifications for the boiler and feed mill equipment shall be included in the manual. The O&M manual shall be updated to reflect any modifications of the equipment or its operating 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 operating parameters and design specifications.
- b. Operating maintenance schedule.

9. 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

10. RECORDKEEPING

All records, Operations and Maintenance Manual, and procedures developed under this Order shall be organized in a readily accessible manner and cover a minimum of the most recent 60-month period. The following records are required to be collected and maintained.

- a. Fuel receipts with amount of diesel and sulfur content for each delivery to the facility.
- b. Annual hours of operation for each diesel electric generator.
- c. Upset condition log for each engine and generator that includes date, time, duration of upset, cause, and corrective action.

11. REPORTING

- a. The following information will be submitted to the AQP at the address in Condition 9 above by January 31 of each calendar year.
 - i. Annual summary of air contaminant emissions, 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 diesel electric generation facility is discontinued for a period of eighteen (18) months, unless prior written notification is received by Ecology at the address in Condition 9 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 remainder of this authorization, shall not be affected thereby.