

## TECHNICAL REVIEW: AIR PERMIT BY RULE

<b>Permit No.:</b>	NPR	<b>Company Name:</b>	Valley Feed Mills, Inc.	<b>APD Reviewer:</b>	Michael Wilson, P.E.
<b>Project No.:</b>	123268	<b>Site/Area Name:</b>		<b>PBR No(s):</b>	106.183 and 106.261

### GENERAL INFORMATION

<b>Regulated Entity No.:</b>	RN100810910	<b>Project Type:</b>	MLTR (for retroactive Std Exempts 7 and 106, no regis required)
<b>Customer Reference No.:</b>	CN600493977	<b>Date Received by TCEQ:</b>	June 14, 2006
<b>Account No.:</b>	EE-0089-B	<b>Date Received by Reviewer:</b>	June 15, 2006
<b>City/County:</b>	Clint, El Paso County	<b>Physical Location:</b>	400 Langford, Clint, Texas

### CONTACT INFORMATION

<b>Responsible Official/ Primary</b>	Bobby Surratt Owner/President	<b>Phone No.:</b>	(915) 851-2238	<b>Email :</b>	
<b>Contact Name and Title:</b>		<b>Fax No.:</b>	(915) 851-3278		
<b>Technical Contact/ Consultant</b>	Bobby Surratt Owner/President	<b>Phone No.:</b>	(915) 851-2238	<b>Email :</b>	
<b>Name and Title:</b>		<b>Fax No.:</b>	(915) 851-3278		

GENERAL RULES CHECK	YES	NO	COMMENTS
Is confidential information included in the application?		X	NA
Are there associated NSR or Title V permits for the site?		X	NA
Is each PBR > 25/250 tpy?		X	See emissions table below.
Are PBR sitewide emissions > 25/250 tpy?		X	See emissions table below.
Are there permit limits on using PBRs at the site?		X	NA
Is PSD or Nonattainment netting required?		X	NA
Do NSPS, NESHAP, or MACT standards apply to this registration?		X	NA
Does NOx Cap and Trade apply to this registration?		X	NA
Is the facility in compliance with all other applicable rules and regulations?	X		NA

### DESCRIBE OVERALL PROCESS AT THE SITE

This is a feed mill. Ingredients are received via truck and rail. A boiler generates steam for a corn steam rolling process. Air is moved through the rolled corn for cooling and drying. Corn is stored, handled and loaded out via front end loaders in a partially enclosed loadout area.

### DESCRIBE PROJECT AND INVOLVED PROCESS

The 125 horsepower boiler at this facility is fired on natural gas and generates minor products of combustion. The other sources at this facility (two receiving pits, rolling, cooling/drying operations, and loadout operations with a front end loader) generate particulate matter. The boiler generates steam which is used to steam roll the corn. The cooling/drying operation is accomplished by passing ambient air through the steam rolled corn.

### TECHNICAL SUMMARY - DESCRIBE HOW THE PROJECT MEETS THE RULES

The company represents that all of the requirements of Standard Exemptions 7 and 106 were met back in the mid 1980s when the facility began operations. These Standard Permits exist today as Permits by Rule 106.183 and 106.261 respectively. This facility continues to meet these requirements and, based on their representations, has requested confirmation that the facility is authorized to operate under the historical standard exemptions.

The boiler is less than 40 million Btu, is fired on natural gas, and meets all the requirements of historical exemption 7 and currently 106.183. As stated above the particulate sources at this facility meet all the requirements of historical standard exemption 106. There are no other standard exemptions/PBRs specifically for feedmills. The sources are located more than 100 feet from any other receptors. Less than 6 lb/hr and 10 ton/yr of cellulose fiber will be emitted. There will be no changes to existing control devices and no sources will exceed 5% opacity.

As standard exemption 106 did not require registration, no registration is required. However, Mr. Surratt specifically requested a response to his letter confirming that the facility is authorized under historical standard exemptions 7 and 106. Therefore, a letter has been prepared confirming that this facility is indeed authorized and able to operate under these standard exemptions. Copies of the current PBRs 183 and 261 will be enclosed with the confirmation letter.

### ESTIMATED EMISSIONS

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EPN / Emission Source	VOC		NOx		CO		PM <sub>10</sub>		SO <sub>2</sub>		H2S	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
Receiving Pit No. 1							0.51					
Receiving Pit No. 2							0.51					
Total Receiving Operations								0.68				
Rolling Operations							0.35	0.66				
Boiler	0.01	0.01	0.03	0.08	0.24	0.06	0.01	0.01	0.01	0.01		
Handling and Loadout (front end loader)							0.87	1.16				
<b>TOTAL EMISSIONS (TPY):</b>	<b>0.01</b>	<b>0.01</b>	<b>0.03</b>	<b>0.08</b>	<b>0.24</b>	<b>0.06</b>	<b>2.25</b>	<b>2.51</b>	<b>0.01</b>	<b>0.01</b>		
<b>MAXIMUM OPERATING SCHEDULE:</b>	<b>Hours/Day</b>			<b>Days/Week</b>			<b>Weeks/Year</b>			<b>Hours/Year</b>		

SITE REVIEW / DISTANCE LIMIT	Yes	No	Description/Outcome	Date	Reviewed by
Site Review Required?		X	NA	NA	NA
PBR Distance Limits Met?	X		NA	NA	NA

	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER
<b>SIGNATURE:</b>			
<b>PRINTED NAME:</b>	Michael Wilson, P.E.		Richard A. Hyde, P.E.
<b>DATE:</b>	June 16, 2006		06/16/2006