



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 N. 5<sup>th</sup> STREET  
KANSAS CITY, KANSAS 66101

AIR PERMITTING AND  
COMPLIANCE BRANCH

November 29, 2006

W. Clark Smith  
Permitting Section Supervisor  
Air Quality Division  
Nebraska Department of Environmental Quality  
P.O. Box 98922  
Lincoln, NE 68509-8922

RE: Ag Processing, Inc. Soybean Processing Plant, Hastings, Nebraska  
PSD construction permit revision comments

Dear Mr. Smith:

On October 31, 2006, EPA Region 7 received notification of Nebraska Department of Environmental Quality's (NDEQ) intent to revise the Prevention of Significant Deterioration (PSD) construction permit for the Ag Processing, Inc. Soybean Processing Plant (AGP), Hastings, Nebraska. The revision allows an increase in the haul road silt loading limit set in the September 11, 2006 permit from 0.4 g/m<sup>2</sup> to 3.0 g/m<sup>2</sup> and removes the silt load testing requirement. The EPA Region 7 is providing the following comments.

- 1) The September 11, 2006 permit allows for the construction of a 400 MM Btu/year coal fired boiler which will have coal trucked to the facility to fire the boiler. The increased haul road traffic will not only include coal hauling trucks, but also include transporting of lime and fly ash. The Best Management Practices (BMPs) included in the permit should be made enforceable and more inclusive, for example:
  - covered haul trucks
  - reduced speed limits of 15 miles per hour or less
  - use of wheel washes, pipe grids or gravel pits to prevent track-out
  - frequent sweeping if soil material has been carried onto paved roads from public thoroughfares  
(water sweeper with reclaimed water recommended; wet broom)
  - onsite operational water truck at all times to apply water to control dust as needed to prevent visible emissions violations and offsite dust impacts.
  - appropriate training, onsite enforcement and signage.

Further, Title 129, Chapter 32 makes reference to some specific actions that may control particulate matter generated as a result of the haul roads and should be included in the table under the "Basis for Permit Limits" section on page 3 of the revision.

- 2) If AGP currently has a truck traffic fugitive control strategy and monitoring plan for the site, it should be made enforceable and included as an attachment to the permit or the language included in the permit. If AGP does not have such a plan, they should be required to develop one, have it approved by NDEQ and EPA and implement it at the site. Inclusion of such a plan in the permit allows for the detailed requirements for the control methods and frequency, compliance demonstration and recordkeeping provisions from the document to be stated as enforceable applicable requirements within the PSD permit.
- 3) We further recommend that AGP be required to vacuum or wet sweep roads within 24 hours or less of the observation of fugitive emissions caused by truck traffic on the haul roads. The NDEQ "Haul Road Policy" of March 21, 2005 requires "prompt removal of materials deposited upon paved roads."
- 4) We do not agree with NDEQ that the performance testing requirements should be removed from the permit. Our review of silt loading values and estimated emissions control in AP-42 revealed a wide range of variation. For this reason, performance testing should be required until such time that AGP demonstrates through performance testing that the silt loading value and BMPs are effective and achieve the estimated control of the fugitive emissions from the haul roads after the addition of the coal, lime and fly ash truck traffic.
- 5) The fact sheet states: "The potential emissions were calculated based on a much more conservative silt loading value of 3.0 g/m<sup>2</sup>." This statement incorrectly implies that 3.0 g/m<sup>2</sup> is more conservative than 0.4 g/m<sup>2</sup> and the descriptive wording "much more conservative" should be deleted.

As always, we appreciate the opportunity to provide what we hope you will find to be constructive comments. Please contact Patricia Scott at (913) 551-7312 if you have any questions or comments regarding this letter.

Sincerely,

JoAnn M. Heiman  
Branch Chief  
Air Permitting and Compliance Branch  
Air, RCRA, and Toxics Division