

NSPS Updates

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Air Updates – August 2011

Grain Elevator Issues

- Temporary vs permanent storage capacity
- Dust

Storage Capacity

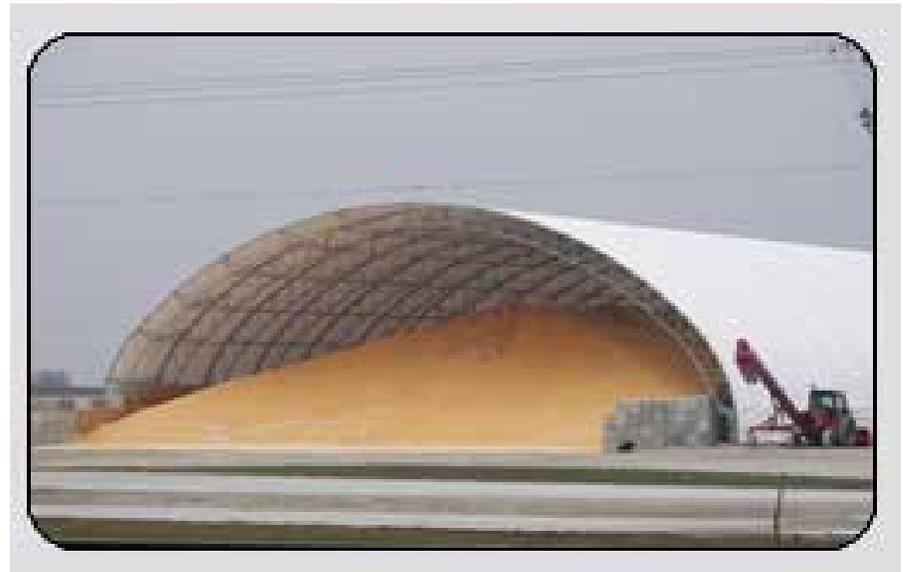
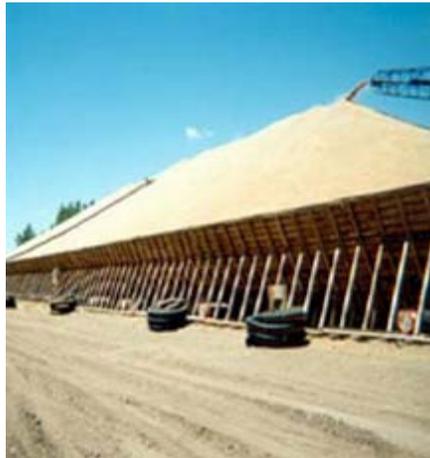
- The amount of permanent grain storage capacity determines NSPS Subpart DD applicability.
 - Grain storage elevator – 1 million bushels
 - Grain terminal elevator – 2.5 million bushels
- Temporary grain storage capacity is not considered for NSPS Subpart DD applicability.

- **Grain storage elevator** means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 1 million bushels.
- **Grain terminal elevator** means any grain elevator which has a permanent storage capacity of more than 2.5 million bushels, excludes (these are grain storage elevators):
 - Animal food manufacturers,
 - Pet food manufacturers,
 - Cereal manufacturers,
 - Breweries, and
 - Livestock feedlots.

Permanent Storage Capacity

- Grain storage capacity which is inside a building, bin, or silo. Includes “tempering” bins (dried grain is stored prior to processing) {per 2005 EPA applicability determination}.
- A bin is a box, frame, crib or enclosed space used for storage.
- Permanent storage typically means that the storage unit has permanent foundation and sides (i.e. concrete/asphalt foundations, and sides made of metal, concrete, wood and other long lasting material.) {per 2007 EPA applicability determination}

Examples of Permanent Storage



Example of Permanent Storage



Examples of Temporary Storage



Permanent vs Temporary

- NDEQ will make the final determination to determine if the grain storage is permanent or temporary.
- NDEQ will consider the following:
 - Foundation
 - Side wall
 - Grain receiving/shipping structures
 - Grain handling structures

Contact Air Quality Permit Hotline at
(877)-834-0474

Permitting Grain Elevators

- PM, PM₁₀, and PM_{2.5} emissions from grain elevators must include fugitive emissions to determine permitting applicability
 - One of “29” source categories listed in Chap 2, Sect 002.01 thru 002.27
 - 002.27 Any other stationary source category regulated by NSPS or NESHAP as of August 7, 1980.
 - “Grain Elevators” category regulated by NSPS Subpart DD August 1978

Construction Permitting

- NSR/PSD Construction Permitting:
 - Major source threshold is 250 tpy (PM, PM₁₀, PM_{2.5}, etc.)
 - Not one of the 28 source categories subject to the 100 tpy Major source threshold {Chap 2, Sect 008.01}
- State Construction Permitting
 - 15 tpy PM₁₀ (including fugitive emissions) {Chap 17, Sect 001.01A}
 - tpy PM_{2.5} (including fugitive emissions) {to be added soon to Title 129, Chapter 17}

Permitting Grain Elevators

- Title V Operating Permits:
 - 100 tpy Major source threshold (PM₁₀, PM_{2.5}, etc., not PM)
 - Must include fugitive emissions (same reason construction permitting)

Permitting may be required, whether your elevator is actually subject to NSPS Subpart DD or not.

NSPS Subpart DD

EPA is currently drafting a proposal to amend NSPS Subpart DD to clarify the temporary and permanent storage capacity.

Dust

- Grain elevators need to make sure grain dust is minimized to prevent off site transport of the dust.
- Off-site transport of grain dust are subject to Title 129, Chapter 32.
- Visible emissions (20% opacity) are subject to Title 129, Chapter 20, Section 004.

Dust

- Enforcement of Chapters 20 or 32 can occur, even if the grain elevator is not subject to NSPS Subpart DD or to NDEQ Air Permits.
- NDEQ does receive complaints concerning off-site dust.
- NDEQ investigates these complaints and may conduct enforcement actions.

Dust Control Options

- Route grain dust from all grain handling (including receiving and loadout) that are in enclosures to baghouse(s).
- Cover grain piles (temporary or permanent).
- Receiving/loadout – use a shroud
- Oil spray

Questions?

NSPS Notebook

NSPS Notebook is a database summarizing each NSPS Subpart, Appendix, and extensively referenced rules.

An extensively referenced rule is a rule that a NSPS Subpart references for a large amount of requirements, including, but not limited to, emission limits, testing methods, QA activities and recordkeeping.

{For example: NSPS Subpart IIII references 40 CFR Parts 89, 94, 1039, 1042, 1065, and 1068.}

NSPS Notebook

- Available on NDEQ's website as of August 2, 2011.
- It is similar to the Air Toxics Notebook.

www.deq.state.ne.us

- Click on “Focus on Air” {left side of screen}
- Scroll down to “Air Planning and Development Program”
- Click on “NSPS Notebook”

NSPS Notebook Contents

- Summary of applicability
- Date of original final rule
- Amendment dates
- Recent rule making activity
- State regulation citation
- Federal regulation citation
- Related rules
- Regulations & Federal Registers
- FAQs, fact sheets, and rule summaries
- Specific Information
- General Information
- Additional materials
- Date subpart page was last updated

NSPS Notebook

The NSPS Notebook is an assistance tool.

If you have any suggestion for information you would like to see, please let me know.

Questions?

Recently Finalized NSPS Rules

- 9/9/2010 – NSPS Subparts A, F, Appendix B Performance Specifications 12A and 12B, Appendix F Procedure 5, and NESHAP Subpart LLL (Portland Cement Plants and Mercury Monitoring Systems)
- 1/8/2011 - NSPS Subparts A and NESHAP Subpart LLL (Portland Cement Plants)
- 1/28/2011 – NSPS Subparts D, Da, Db, and Dc (Steam Generating Units)
- 2/25/2011 – NSPS Subpart Ja (Newer Petroleum Refineries)

Recently Finalized NSPS Rules

- 3/21/2011 - NSPS Subparts A, CCCC/DDDD (CISWI) (includes change to RCRA definition of non-hazardous solid waste – 40 CFR 241)
- 3/21/2011 - NSPS Subparts A, LLLL, and MMMM (Sewage Sludge Incinerators)
- 4/4/2011 - NSPS Subparts Ce, and Ec (HMIWI)
- 6/28/2011 - NSPS Subparts IIII, and JJJJ and 40 CFR 1039, 1042, 1065, and 1068 (Engines)

Questions?

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