## COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT Division or Section of APCD/Stationary Sources Program

## **INTER-OFFICE COMMUNICATION**

## **PS Memo 99-5**

TO: CP Permit Engineers

FROM: Dennis M. Myers/ Aaron Frame/ Jill Cooper

DATE: July 9, 1999

SUBJECT: Grain Elevators

Grain elevators can be comprised of several different operations: 1) grain receiving by truck or rail; 2) grain shipping by truck or rail; 3) grain storage by bins or silos; 4) grain cleaning or milling; 5) grain handling; and 6) column or rack grain dryers. This memorandum defines which of the above operations are considered "process" or "process equipment" to determine the applicability of certain manufacturing process requirements in Air Quality Control Commission Regulation No. 1 and Regulation No. 6, Part B. Because short-term limits are being eliminated from true minor source permits (see PS Memorandum 98-3), many Construction Permits must now incorporate process weight rate requirements from Regulation No. 1 and Regulation No. 6, Part B.

Regulation No. 1, Section III.C. requires owners and operators of <u>all</u> manufacturing processes in the State of Colorado to limit the emissions of particulate matter from the process into the atmosphere depending upon the process weight rate of the equipment. Regulation No. 6, Part B, Section III. requires owners and operators of <u>new</u> manufacturing processes to limit the emissions of particulate matter (and sulfur dioxide if applicable) into the atmosphere. The Air Quality Control Commission has not defined "manufacturing process," but the Common Provisions defines "process" and "process equipment" as:

An action, operation or treatment involving chemical, industrial, or manufacturing factors, such as heat treating furnaces, mixing kettles, cupolas, blast furnaces, heating and reheating furnaces, puddling furnaces, sintering trains, electric furnaces, kilns, stills, dryers, roasters, and equipment used in connection therewith, and all other methods and forms of manufacturing or processing that may emit air pollutants.

Manufacturing typically involves the consumption of raw materials to form a finished product and the nature of the raw material is modified during the process.

The Division has determined that the following grain handling operations are a form of manufacturing or processing that may emit air pollutants: 1) cleaners; 2) mills; 3) dryers; 4) flakers; 5) pelletizers; 6) coolers; and 7) kilns. These operations at a grain elevator site are subject to Regulation No. 1, Section III.C. and Regulation No. 6, Part B, Section III. (if it is a new source). Permit engineers should try to identify the types of equipment subject to the process weight rate requirements of Regulation No. 1 and Regulation No. 6, Part B in the relevant permit condition to provide clarity to

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the source and the Division's enforcement staff. The process weight rate requirements apply to each activity individually. Please note that Regulation No. 6, Part B is a state only requirement.

The nature of the grain is not changed during activities such as receiving, shipping, storage, and handling which only involve the movement of grain. The Division considers that these activities are not part of the manufacturing process.

This Division memorandum does not affect the applicability or enforceability of any other requirement of the Colorado Air Pollution Prevention and Control Act or the Air Quality Control Commission's regulations for grain elevators (including the fugitive dust requirements of Regulation No. 1, Section III.D.2.c.).