

**INTER-OFFICE COMMUNICATION**

PS Memo #: PS96-1

TO: Stationary Sources Program Staff  
FROM: Jim Geier, Dennis M. Myers  
DATE: January 23, 1996  
RE: Guidance on calculating PTE for grain handling facilities

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EPA has recently published guidance dated November 14, 1995 on how to calculate PTE for country grain elevators which the Division will follow. This policy has been adopted by EPA to allow many rural sources to avoid Title V requirements. Country grain elevator means any grain elevator that receives more than 50 percent of its grain from farmers in the immediate vicinity during the harvest season. A grain terminal is an elevator that receives its grain primarily from other elevators. **This guidance applies only to existing country grain elevators**, and should not be applied to new sources since the area that may supply the new grain elevator will not yet be well established. This guidance on calculating PTE is only for OP applicability purposes, and future EPA rulemaking will further clarify this policy.

EPA's guidance says the following in regard to calculating PTE (for Title V purposes) for existing country grain elevators:

1. PTE should be based on PM-10 emissions, and not TSP. Please note though, that TSP is still a criteria pollutant for construction permit purposes, and both TSP and PM-10 should be evaluated in the preliminary analysis. At the present time, TSP is still regulated by EPA for NSR purposes.
  2. Maximum capacity for estimating PTE should be based on the highest amount of grain received during the previous 5 years, multiplied by a factor of 1.2. The 1.2 factor is designed to take into account other factors such as increased crop yield, or increased number of acres being harvested in the local area of the country grain elevator.
  3. There may be rare instances where future grain receipts in a given year exceed the historical production figure multiplied by 1.2 (see number 2 above). In these cases, the maximum receipt estimate would need to be recalculated.
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**Example:** The maximum amount of grain received during the previous 5 years for a grain elevator is 2 million bushels. Consequently, the estimate of maximum receipt, to be used for purposes of determining the facility's potential to emit, is 2 times 1.2, or 2.4 million bushels per year. In some future year, 2.6 million bushels are received. At this point, the maximum receipt estimate becomes 2.6 times 1.2, or 3.1 million bushels per year. If a source should submit an APEN with a requested level that is greater than the 5 year historical production figure, then that requested level should be multiplied by the 1.2 factor for determining PTE.

This memo summarizes EPA's position on this issue. The complete EPA memo is dated November 14, 1995, and may be received by contacting Dennis Myers.