



Air Quality Permitting Statement of Basis

December 20, 2006

**Tier I Operating Permit No. T1-050013
J.R. Simplot Co., Food Group, Caldwell
Facility ID No. 027-00009**

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AIR QUALITY DIVISION

FINAL

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Acronyms, Units, and Chemical Nomenclatures

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|------------------|--|
| AFS | AIRS Facility Subsystem |
| AIRS | Aerometric Information Retrieval System |
| AQCR | Air Quality Control Region |
| CAA | Clean Air Act |
| CFR | Code of Federal Regulations |
| CO | carbon monoxide |
| DEQ | Department of Environmental Quality |
| EPA | U.S. Environmental Protection Agency |
| gr | grain (1 lb = 7,000 grains) |
| HAPs | Hazardous Air Pollutants |
| IDAPA | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| lb/hr | pound per hour |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NO _x | nitrogen oxides |
| NSPS | New Source Performance Standards |
| PM | particulate matter |
| PM ₁₀ | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers |
| PSD | Prevention of Significant Deterioration |
| PTC | permit to construct |
| PTE | potential to emit |
| Rules | Rules for the Control of Air Pollution in Idaho |
| SIC | Standard Industrial Classification |
| SIP | State Implementation Plan |
| SO ₂ | sulfur dioxide |
| T/yr | tons per year |
| UTM | Universal Transverse Mercator |
| VOC | volatile organic compound |

Public Comment / Affected States / EPA Review Summary

A 30-day public comment period for the J.R. Simplot Co., Food Group Tier I operating permit was held in accordance with IDAPA 58.01.01.364, Rules for the Control of Air Pollution in Idaho.

IDAPA 58.01.01.008.01 defines *affected states* as: "*All states: whose air quality may be affected by the emissions of the Tier I source and that are contiguous to Idaho; or that are within 50 miles of the Tier I source.*"

A review of the site location information included in the permit application indicates that the facility is located within 50 miles of a state border. Therefore, Oregon was provided an opportunity to comment on the draft Tier I operating permit.

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

2. FACILITY DESCRIPTION

J. R. Simplot, Food Group, Caldwell facility (Simplot) produces pre-fried French fries, pre-formed and pre-fried potato products, and other processed potato products.

3. FACILITY / AREA CLASSIFICATION

This facility is not a major facility as defined by IDAPA 58.01.01.205 because its potential to emit is limited to less than 250 T/yr of a regulated NSR pollutant. The facility is not a designated facility as defined by IDAPA 58.01.01.006.26. The facility is classified as a major facility for Tier I operating permit requirements, in accordance with IDAPA 58.01.01.008.10, because it emits or has the potential to emit a regulated air pollutant above a Tier I operating permit major source threshold. The SIC code defining the facility is 2037, *Frozen Fruits, Fruits Juices and Vegetables*. The AIRS classification is "A."

The facility is located within AQCR 64 and UTM zone 11. The facility is located in Canyon County which is classified as unclassifiable for all criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone). There are no Class I areas within 10 km of the facility.

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at Simplot. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

This permitting action involves the following:

- renewal of the facility's existing Tier I operating permit;
- replacement of Tier I Operating Permit No. T1-030015, issued June 21, 2004, the terms and conditions of which shall no longer apply;
- incorporates PTC No. P-050016, issued December 22, 2005, which replaced PTC No. 027-00009, issued December 31, 1997;
- incorporates PTC No. P-060025, issued June 14, 2006;
- removal of requirements pertaining to the Ethanol Production Plant and Ethanol Storage Tanks, which are inoperable;
- incorporation of ERC requirements pertaining to the Ethanol Production Plant and Ethanol Storage Tanks.

4.1 Application Chronology

| | |
|---------------|---|
| April 4, 2005 | DEQ received Tier I operating permit and PTC applications. Simplot requests PTC be included in Tier I operating permit renewal. |
| June 3, 2005 | DEQ determined Tier I operating permit application complete. |

| | |
|-------------------|--|
| December 22, 2005 | DEQ issued final PTC. |
| April 3, 2006 | DEQ received facility draft comments. |
| April 19, 2006 | DEQ emailed requested changes to facility. |
| April 21, 2006 | DEQ received additional facility draft comments. |

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this permitting action.

5.1 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this permit.

IDAPA 58.01.01.300..... Procedures and Requirements for Tier I Operating Permits

The facility is Tier I major facility with a current Tier I operating permit. The proposed project is renewal of the facility's Tier I operating permit.

IDAPA 58.01.01.369..... Tier I Operating Permit Renewal

This regulation stipulates the criteria and procedures for the renewal of a Tier I operating permit. The proposed project is significant modification of the current Tier I operating permit that meets the criteria specified within the regulation IDAPA 58.01.01.210, Demonstration of Preconstruction Compliance with Toxic Standards.

IDAPA 58.01.01.785..... Rules for the Control of Incinerators

DEQ has reviewed the applicability of this regulation in response to the facility's September 11, 2006 request for its designation as a non-applicable requirement and subsequent removal of the permit. This regulation does not apply to flares because it is not an incinerator.

5.2 Fee Review

Simplot is a major facility as defined in IDAPA 58.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387. The facility is current with its registration fees.

5.3 Emissions Description and Emissions Inventory

The following permits contain a description of emissions and emissions inventory for this facility.

- PTC No. P-030014, issued October 17, 2003
- PTC No. P-050016, issued December 22, 2005
- PTC No. P-060025, issued June 14, 2006

6. PERMIT CONDITIONS

This section summarizes and explains the changes associated with the renewal of this Tier I operating permit.

All permit sections have been renumbered, and reformatted in order to update the permit format. Permit Sections 2 through 7 have been renumbered to Permit Sections 3 through 6. Existing Permit Section 7 - Ethanol Production Plant and Permit Section 8 – Ethanol Storage Tanks have not been included in this permit as those emission units are inoperable.

The facility-wide requirements section has been updated to incorporate the latest language pertaining to those permit conditions.

Former Section 2, Production Lines No. 1, 4, and 6, was changed to incorporate PTC No. P-050016, issued December 22, 2005, and has been renumbered to Permit Section 3. The section was changed because former Permit Section 2 referenced PTC No. 027-00009, issued December 31, 1997, which was superseded by PTC No. P-050016, issued December 22, 2005.

7. PERMIT REVIEW

7.1 *Public Comment*

A public comment period was held from July 1, 2006, to July 31, 2006, in accordance with IDAPA 58.01.01.364, Rules for the Control of Air Pollution in Idaho.

8. RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends that DEQ issue Tier I Operating Permit No. T1-050013 to J.R. Simplot Co., Food Group of Caldwell. This permit renews the facility's existing Tier I operating permit. The project does not involve PSD permitting requirements.

AC/bf Permit No. T1-050013

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Appendix A

AIRS Information

P-050016

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: J. R. Simplot Company, Food Group, Caldwell Facility
Facility Location: Caldwell, ID
AIRS Number: 027-00009

| AIR PROGRAM POLLUTANT | SIP | PSD | NSPS (Part 60) | NESHAP (Part 61) | MACT (Part 63) | SM80 | TITLE V | AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment |
|---------------------------|-----|-----|----------------|------------------|----------------|------|---------|---|
| SO ₂ | B | | | | | | B | U |
| NO _x | A | | | | | | A | U |
| CO | A | | | | | | A | U |
| PM ₁₀ | A | | | | | | A | U |
| PT (Particulate) | A | | | | | | A | U |
| VOC | B | | B | | | | B | U |
| THAP (Total HAPs) | | | | | | | | |
| APPLICABLE SUBPART | | | | | | | | |
| | | | Kb | | | | | |

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).