TECHNICAL BASIS FOR TIER I OPERATING PERMIT

DATE: October 4, 2002

PERMIT WRITER: Steve Ogle

PERMIT COORDINATOR: Bill Rogers

SUBJECT: *TECHNICAL MEMORANDUM FOR TIER I OPERATING PERMIT*
AIRS Facility No. 027-00009, J.R. Simplot Co., Food Group, Caldwell
Final Tier I Operating Permit

Permittee:	J.R. Simplot Company, Food Group
Permit Number:	027-00009
Air Quality Control Region:	64
AIRS Facility Classification:	A
Standard Industrial Classification:	2037
Zone:	11
UTM Coordinates:	521.5, 4835.0
Facility Mailing Address:	P.O. Box 1059
County:	Canyon
Facility Contact Name and Title:	Bill Rutherford, Environmental Manager
Contact Name Phone Number:	(208) 454-4360
Responsible Official Name and Title:	Reggie Pederson, Unit Director
Exact Plant Location:	Two Miles West of Caldwell on Highway 19
General Nature of Business & Kinds of Products:	Potato processing and Ethanol production

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LIST OF ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
COD	chemical oxygen demand
DEQ	Idaho Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
ESP	electrostatic precipitator
gal/day	gallons per day
gal/min	gallons per minute
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
H_2S	hydrogen sulfide
IDAPA	a numbering designation for all administrative rules in Idaho promulgated under the Idaho Administrative Procedures Act
kPa	kiloPascals
lb/hr	pound per hour
MACT	Maximum Achievable Control Technology
m^3	cubic meters
mmHg	millimeters of mercury
MMBtu	million British thermal units
MMBtu/hr	million British thermal units 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 of ten micrometers or less
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	*Rules for the Control of Air Pollution in Idaho*
Simplot	J.R. Simplot Company, Food Group
SIP	State Implementation Plan
SO_2	sulfur dioxide
T/day	tons per day
T/yr	tons per year
VOC	volatile organic compound
VOL	volatile organic liquid

PUBLIC COMMENT / AFFECTED STATE / EPA REVIEW SUMMARY

This permit has been issued as draft and has proceeded through a 30-day public comment period. The public comment period started on April 8, 2002 and ended on May 8, 2002. No public hearing was requested by any entity. Responses to comments received during the public comment period can be found in Appendix D of this technical memorandum. On July 26, 2002, the proposed operating permit and the technical memorandum were sent to EPA for their 45-day review as required by IDAPA 58.01.01.366. EPA did not provide written objection to the proposed permit.

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 fifty (50) miles of the Tier I source."*

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

1. PURPOSE

The purpose of this memorandum is to describe the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362, *Rules for the Control of Air Pollution in Idaho.*

The DEQ has reviewed the information provided by Simplot regarding the operation of the potato processing and ethanol production plants located near Caldwell, Idaho. This information was submitted based on the requirements to submit a Tier I operating permit in accordance with IDAPA 58.01.01.300.

2. SUMMARY OF EVENTS

On May 23, 1995, DEQ received a Tier I operating permit application from Simplot for their Caldwell facility. The application was prepared by Brown and Caldwell, the facility's initial consulting firm. DEQ declared the application administratively complete on February 16, 1996. On February 1, 1999, DEQ received a revised Tier I operating permit application prepared by McCulley, Frick, and Gilman, Inc. The purpose of the revised Tier I operating permit application was to update the application to reflect several substantial changes at the facility that occurred after the 1995 application was submitted, and to fulfill the requirements of an enforcement consent order entered into on November 12, 1998.

On October 25, 2001, DEQ issued an activation letter to Simplot, stating that the Tier I operating permit application had been removed from backlog, and projecting a final issuance date of June 21, 2002. A completeness letter was issued to Simplot on November 29, 2001. On March 9, 2002, DEQ issued a draft Tier I operating permit for the facility review. Simplot submitted comments on the draft Tier I operating permit on March 19, 2002, and DEQ prepared the draft permit for the public comment period on March 20, 2002. A public comment period was held from April 8, 2002 until May 8, 2002, and DEQ received several comments regarding the draft permit. On May 9, 2002, DEQ drafted a response-to-comments document addressing the comments received (refer to Appendix D of this memorandum). DEQ prepared a proposed permit and submitted it to EPA for their 45-day review on July 26, 2002. EPA did not provide written objection to the proposed permit. This permitting action is JR Simplot Co.'s final Tier I operating permit for their Caldwell facility. The permit expires October 4, 2005.

3. BASIS OF THE ANALYSIS

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- The revised Tier I operating permit application, received by DEQ on February 1, 1999
- Submissions from Simplot dated October 29, 2001 and March 19, 2002
- Existing PTCs for the facility
- Existing consent orders for the facility
- Existing DEQ inspection reports for the facility
- *Rules for the Control of Air Pollution in Idaho*
- Code of Federal Regulations, Title 40
- *Compilation of Air Pollutant Emission Factors*, AP-42, Fifth Edition, January 1995, Office of Air Quality Planning and Standards, EPA
- Guidance developed by the EPA and DEQ
- Title V permits issued by other jurisdictions
- Documents and procedures developed in the Title V Pilot Operating Permit Program

4. *FACILITY DESCRIPTION*

4.1 GENERAL PROCESS DESCRIPTION

The potato processing plant and the ethanol production plant are described in Section 4.1.1 and 4.1.2 below. For air permitting purposes, both plants are considered one facility. Three natural gas-fired boilers located in the steam-generating plant provide process steam for both plants.

4.1.1 Potato Processing Plant

Raw potatoes are delivered to the plant by truck and unloaded within enclosed storage buildings. Inside the storage buildings, potatoes are pushed from storage piles into a water flume system used to wash and transport the potatoes. Potatoes are mechanically sorted by size and are also randomly inspected during harvest. The potatoes are then transported by flume to the various production lines.

The plant has three processing lines, each equipped with a blancher, a dryer, and a fryer. At the front of the production lines, potatoes are peeled by steam peelers and sliced into various shapes and lengths at the cutting decks. Sliced potatoes are then sent through blanchers to remove excess sugars and through dryers to remove surface moisture. Each dryer is typically one large unit that is divided into two or three zones by internal baffles. Each zone is heated with natural gas-fired burners and vented directly to the atmosphere. Next, hot cooking oil fryers are used to partially cook the potatoes. Steam coils are used to heat the oil in the fryers and the fryers are primarily vented to a wet ESP. After the potato products are fried, the final product is frozen and packed for shipping.

Natural gas-fired heating units are used to heat the plant during cold weather.

4.1.2 Ethanol Production Plant

The ethanol plant uses fruits, vegetables, and grain waste—including potato waste from the Simplot potato processing plant in Caldwell—to produce ethanol. The ethanol production process involves three primary steps: continuous cooking, batch fermentation, and continuous distillation.

Wet waste vegetables, fruits, and grains are brought into the plant by pump or conveyer to vertical hammermills that grind the waste into a slurry. Enzymes are mixed with the slurry and the mixture is pumped into a pressure cooker. The pressure cooker is steam operated. Flash steam from the cooker is recovered and used to preheat the slurry. After the pressure cooker, the slurry is cooled and mixed with additional enzymes before being pumped into a holding tank. After the holding tank, the slurry is cooled to fermentation temperature (~100°F) and pumped to one of six fermenters. Yeast, enzymes, and other chemicals are added to the slurry—now called mash—and fermented for approximately two days. After the fermentation is complete, the fermented mash—now called beer—is transferred to a holding tank known as the beer well. From the beer well, the beer is pumped to an atmospheric distillation tower where alcohol is separated from water and solids in the beer. The ethanol is distilled to approximately 95% purity. Water and solids are pumped to a centrifuge for separation. Liquids are then sent to an onsite waste treatment facility and solids are sold to make cattle feed.

The alcohol is processed through a molecular sieve dehydrator to remove remaining water, and the resulting ethanol is approximately 100% pure. The alcohol is denatured with unleaded gasoline prior to loading into trucks for transport to marketing. The gasoline, as well as ethanol product that does not meet specification, is stored in underground tanks. The denatured ethanol is sold as a motor vehicle fuel additive that reduces mobile source air emissions.

The wastewater treatment facility uses an anaerobic digester to treat the wastewater from the distillation process. Gaseous byproducts from the digestion process are collected and processed through a flare system.

4.2 FACILITY CLASSIFICATION

The facility is classified as a major facility, in accordance with IDAPA 58.01.01.008.10, for Tier I permitting purposes because the facility emits or has the potential to emit a regulated air pollutant in amounts greater than or equal to 100 T/yr. The facility is a major facility as defined in IDAPA 58.01.01.006.55 but it is not subject to PSD regulation because the facility does not emit or have the potential to emit a regulate air pollutant in amounts greater than or equal to 250 T/yr. The facility is a designated facility as defined by IDAPA 58.01.01.006.27 because the combined fossil fuel heat input to the steam plant is greater than 250 MMBtu/hr. But again, the facility has not triggered, and is not subject to, PSD regulation because the construction date of the boilers pre-dates the effective PSD regulation date.

The facility is subject to federal NSPS in accordance with 40 CFR Part 60.110b. The facility is not subject to federal NESHAP requirements in accordance with 40 CFR 61, or MACT standards in accordance with 40 CFR 63. The SIC defining the facility is 2037 and the AIRS/AFS facility classification is A.

4.3 AREA CLASSIFICATION

The facility is located in Canyon County, which is located within AQCR 64. This area is designated unclassifiable for all federal and state criteria air pollutants. There are no Class I areas within 10 km of the facility. Oregon is located within 50 miles of Simplot's Caldwell facility, and as such, is an affected state as defined by IDAPA 58.01.01.008.01.

4.4 PERMITTING HISTORY

July 6, 1994: An exemption determination was issued to Simplot for temporary operation of a small dryer for research/testing purposes. The estimated emissions for the dryer were determined to be below regulatory concern.

December 17, 1997: PTC No. 027-00009 was issued for the anaerobic digester with biogas flare.

December 31, 1997: PTC No. 027-00009 was issued for the Line No. 5 preformed potato fryer.

November 12, 1998: Enforcement consent order requiring Simplot to:

a) submit an updated Tier I operating permit application by February 1, 1999,

b) remove the Line No. 1 fryer/scrubber (S-C1-F1) and fryer stack No. 7, and

c) pay a civil penalty of $151,500.

The requirements of the consent order were in response to Simplot's alleged failure to obtain PTCs for six sources installed between 1982 and 1995, and alleged opacity violations.

July 23, 1999: Draft PTC No. 027-00009, for previously unpermitted emission units, was issued to the facility for review. The draft PTC established regulations for the No. 1, 4, and 6 dryers, the No. 1, 4, and 6 fryers, the two Cleaver-Brooks boilers, the ethanol production plant, and the ethanol storage tanks.

August 23, 1999: Simplot made comments regarding the draft permit in a meeting with DEQ personnel.

August 31, 1999:	Simplot supplied documented comments regarding the draft permit in a letter to DEQ. Currently, DEQ has not issued a final permit, nor has DEQ issued any other determinations or permitting actions with regard to this draft permit.
October 7, 1999:	Enforcement consent order requiring Simplot to: a) pay a civil penalty of $215,200, and b) install, test, and monitor new air pollution control equipment for the Line No. 1 potato fryer. The requirements of the consent order were in response to two alleged violations of PTC No. 027-00009.
November 28, 2001:	In a meeting between Simplot and DEQ personnel, Simplot agreed to submit a facility-wide Tier II operating permit application. Upon receipt of the Tier II operating permit application, DEQ will draft a facility-wide Tier II operating permit for Simplot in accordance with the *Rules.*
December 10, 2001:	PTC No. 027-00009, issued December 17, 1997 for the anaerobic digester with biogas flare, was amended.

5. *REGULATORY ANALYSIS*

5.1 FACILITY-WIDE APPLICABLE REQUIREMENTS

5.1.1 Fugitive Particulate Matter, IDAPA 58.01.01.650-651

5.1.1.1 Requirement

Permit Condition 1.1 states that all reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

Permit Condition 1.1 also states that visible emissions shall not be observed leaving the property boundary of the permitted facility for a period or periods aggregating more than three minutes in any 60-minute period. This condition is taken from Permit Condition 1.3 in PTC No. 027-00009, dated December 10, 2001, and is an applicable permit condition for the Tier I operating permit in accordance with IDAPA 58.01.01.322.01.

5.1.1.2 Compliance Demonstration

Permit Condition 1.2 states that the permittee is required to monitor and maintain records of the frequency and the methods used by the facility to reasonably control fugitive particulate emissions. IDAPA 58.01.01.651 gives some examples of ways to reasonably control fugitive emissions, which include using water or chemicals, applying dust suppressants, using control equipment, covering trucks, paving roads or parking areas, and removing materials from streets.

Permit Condition 1.3 requires that the permittee maintain a record of all fugitive dust complaints received. In addition, the permittee is required to take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The permittee is also required to maintain records that include the date that each complaint was received and a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

To ensure that the methods being used by the permittee to reasonably control fugitive particulate matter emissions whether or not a complaint is received, Permit Condition 1.4 requires that the

permittee conduct quarterly inspections of the facility. The permittee is required to inspect potential sources of fugitive emissions during daylight hours and under normal operating conditions. The fugitive emissions inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any fugitive emissions are present, the permittee shall perform a Method 22 visible emissions test at the property boundary in accordance with the procedures outlined in IDAPA 58.01.01.625. If visible emissions are observed leaving the property boundary of the permitted facility for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance to DEQ in writing within 72 hours. The permittee is also required to maintain records of the results of each fugitive emission inspection.

Permit Conditions 1.3 and 1.4 both require the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of receiving a valid complaint or determining that fugitive particulate emissions are not being reasonably controlled meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.2 Control of Odors, IDAPA 58.01.01.775-776

5.1.2.1 Requirement

Permit Condition 1.5 and IDAPA 58.01.01.776 both state that: *"No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids to the atmosphere in such quantities as to cause air pollution."* This condition is currently considered federally enforceable until such time it is removed from the SIP, at which time it will be a state-only enforceable requirement.

5.1.2.2 Compliance Demonstration

Permit Condition 1.6 requires the permittee to maintain records of all odor complaints received. If the complaint has merit, the permittee is required to take appropriate corrective action as expeditiously as practicable. The records are required to contain the date that each complaint was received and a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Permit Condition 1.6 requires the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of receiving a valid odor complaint meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.3 Visible Emissions, IDAPA 58.01.01.625

5.1.3.1 Requirement

IDAPA 58.01.01.625 and Permit Condition 1.7 state that: *"(No) person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20 percent (20%) opacity as determined ..."* This provision does not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason(s) for the failure of the emission to comply with the requirements of this rule.

5.1.3.2 Compliance Demonstration

To ensure reasonable compliance with the visible emissions rule, Permit Condition 1.8 requires that the permittee conduct quarterly visible emissions inspections of the facility. The permittee is required to inspect potential point sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection consists of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall take appropriate corrective action as expeditiously as practicable. If the corrective

action does not eliminate the visible emissions, then a Method 9, or Method 22 for the flare, visible emissions observation, in accordance with the procedures outlined in IDAPA 58.01.01.625, must be conducted as soon as possible, but in no case later than 48 hours after the failure of the corrective action to remedy the visible emissions. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is determined to be greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee must take corrective action and report the exceedence in its annual compliance certification and in accordance with the excess emissions rules in IDAPA 58.01.01.130-136. The permittee is also required to maintain records of the results of each visible emissions inspection and each opacity test when conducted. These records must include the date of each inspection, a description of the permittee's assessment of the conditions existing at the time visible emissions are present, any corrective action taken in response to the visible emissions, and the date corrective action was taken.

It should be noted that if a specific emission unit has a specific compliance demonstration method for visible emissions that differs from Permit Condition 1.8, then the specific compliance demonstration method overrides the requirement of Condition 1.8. Permit Condition 1.8 is intended for small sources that would generally not have any visible emissions.

Permit Condition 1.8 requires the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of discovering visible emissions meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.4 Excess Emissions, IDAPA58.01.01.130-136

5.1.4.1 Requirement

Permit Condition 1.9 requires that the permittee comply with the requirements of IDAPA 58.01.01.130-136 for startup, shutdown, scheduled maintenance, safety measures, upset, and breakdowns. This section is fairly self-explanatory and no additional detail is necessary in this technical analysis. It should; however, be noted that Subsections 133.02, 133.03, 134.04, and 134.05 are not specifically included in the permit as applicable requirements. These provisions of the *Rules* only apply if the permittee anticipates requesting consideration under Subsection 131.02 of the *Rules* to allow DEQ to determine if an enforcement action to impose penalties is warranted. Section 131.01 *states "...The owner or operator of a facility or emissions unit generating excess emissions shall comply with Sections 131, 132, 133.01, 134.01, 134.02, 134.03, 135, and 136, as applicable. If the owner or operator anticipates requesting consideration under Subsection 131.02, then the owner or operator shall also comply with the applicable provisions of Subsections 133.02, 133.03, 134.04, and 134.05."*

Failure to prepare or file procedures pursuant to Sections 133.02 and 134.04 is not a violation of the *Rules* in and of itself, as stated in Subsections 133.03(a) and 134.06(b). Therefore, since the permittee has the option to follow the procedures in Subsections 133.02, 133.03, 134.04, and 134.05; and is not compelled to, the subsections are not considered applicable requirements for the purpose of this permit and are not included as such.

The regulations governing excess emissions are currently state-only enforceable applicable requirements. IDAPA 58.01.01, Sections 131-136 will become federally enforceable upon approval by EPA as part of the SIP.

5.1.4.2 Compliance Demonstration

The compliance demonstration is contained within the text of Permit Condition 1.9. No further clarification is necessary here.

5.1.5 Open Burning

This is a self-explanatory regulation. Refer to Permit Condition 1.10 and IDAPA 58.01.01.600-616.

5.1.6 Renovation/Demolition

The regulations in 40 CFR 61, Subpart M are intended to control asbestos releases to the atmosphere. This is a self-explanatory regulation. Refer to Permit Condition 1.11 and 40 CFR 61, Subpart M.

5.1.7 Chemical Accident Prevention Provisions

Any facility that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, must comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

a) Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130; or

b) The date on which a regulated substance is first present above a threshold quantity in a process.

5.1.8 Fuel-Sulfur Content

This is a self-explanatory regulation. Refer to Permit Condition 1.13 and IDAPA 58.01.01.728.

5.1.9 Fuel-Burning Equipment

This is a self-explanatory regulation. Refer to Permit Condition 1.14 and IDAPA 58.01.01.676-677.

5.1.10 Recycling and Emissions Reductions

The regulations in 40 CFR 82, Subpart F are intended to reduce emissions of Class I and Class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with Section 608 of the Clean Air Act. This is a self-explanatory regulation. Refer to Permit Condition 1.15 and 40 CFR 82, Subpart F.

5.1.11 New Source Performance Standards, Subpart A Applicability

5.1.11.1 Requirements

The ethanol storage tanks are NSPS-affected facilities, subject to 40 CFR 60 Subpart Kb. The tanks were constructed after July 23, 1984 and have capacities greater than 151m^3 with a maximum true vapor pressure greater than 3.5kPa. Refer to 40 CFR 60.110b(a)-(c).

The facility must also comply with applicable sections of NSPS, Subpart A. After reviewing the general provisions it was determined that only the following sections applied to this facility:

- 40 CFR 60.4 — Address;
- 40 CFR 60.7(a)(4) and (b) — Notification and Recordkeeping;
- 40 CFR 60.11(b), (c), (d), and (g) — Standards and Maintenance;
- 40 CFR 60.12 — Circumvention;
- 40 CFR 60.14 — Modification;
- 40 CFR 60.15 — Reconstruction.

5.1.11.2 Compliance Demonstration

Most of these requirements are to show compliance. Each requirement is taken directly out of Subpart A and is included as text in the Permit Conditions.

5.1.11.3 Non-Applicable Requirements

The following sections of Subpart A were not included in the permit as applicable requirements:

- 40 CFR 60.1, 2, 3, 5, 6, 9, 10, 16, and 17—these requirements do not need to be included in the Tier I operating permit;
- 40 CFR 60.7(a)(1-3, 6)—these requirements address notification of initial startup of a facility (the NSPS sources at this facility have been operating since 1986);
- 40 CFR 60.7(a)(5,7)—this facility is not required to utilize a continuous opacity monitoring system;
- 40 CFR 60.7(c), (d), (e), and (f)—this facility does not utilize a continuous monitoring system;
- 40 CFR 60.7(g) and (h)—these are informational sections only;
- 40 CFR 60.8(a)—it addresses notification of initial startup of a facility;
- 40 CFR 60.8(f) and 11(a)—Subpart Kb does not require compliance testing;
- 40 CFR 60.11(e)—it refers to the initial compliance test (the tanks at this facility have been operating since 1986);
- 40 CFR 60.11(f)—it does not apply to this facility;
- 40 CFR 60.13—this facility does not utilize any continuous monitoring systems;
- 40 CFR 60.18—this facility does not have any control devices as described in the section.

5.1.12 Compliance Testing

Permit Condition 1.24 outlines the DEQ-approved method(s) by which the permittee should perform compliance testing. This condition also contains reporting requirements for compliance tests. The terms of Permit Condition 1.24 are self-explanatory.

5.1.13 Test Methods

Permit Condition 1.25 lists test methods to be used for compliance testing. This is a self-explanatory regulation.

5.1.14 Monitoring and Recordkeeping

This condition details methods for monitoring and recordkeeping requirements of the permit. This is a self-explanatory regulation.

5.1.15 Reports and Certifications

This condition details methods for reporting requirements of the permit. This is a self-explanatory regulation.

5.2 EMISSIONS UNIT - PRODUCTION LINES NO. 1, 4, AND 6

5.2.1 Emissions Unit Description

A description of the production lines can be found in Section 4.1.1 of this technical memorandum. The No. 1 fryer was initially permitted as line No. 5 fryer in PTC No. 027-00009, dated December 31, 1997, and will be referred to as line No. 1 fryer throughout this technical memorandum unless otherwise denoted.

Before 1998, the production lines for the Simplot facility were located in Plants 1 and 2. Plant 1 was permanently shut down in 1998, eliminating lines No. 0, 1 (the original No. 1 production line before Plant 1 was shut down), 2, and 7. The existing production lines (No. 1, 4, and 6) are all located in Plant 2. Table 5.1 shows the unit numbers, as assigned by Simplot, associated with the existing production lines.

Table 5.1 Unit Numbers

Production Line No. 1		Production Line No. 4		Production Line No. 6	
Dryer	Fryer	Dryer	Fryer	Dryer	Fryer
S-C-D1	S-C-F1	S-C-D4	S-C-F4	S-C-D6	S-C-F6

The line No. 1 dryer and fryer were installed in 1995 and 1998, respectively; line No. 4 dryer and fryer were installed in 1972 and 1970, respectively; and line No. 6 dryer and fryer were installed in 1968 and 1970, respectively. The rated capacities of the line No. 1, 4 and 6 dryers are 5.5, 16, and 28 MMBtu/hr, respectively. The rated capacities of the line No. 1, 4, and 6 fryers are 75,000, 260,000, and 270,000 pounds per eight-hour shift. Combustion emissions for the dryers are based on continuous operation at burner capacity.

5.2.2 Process Weight Limitations, IDAPA 58.01.01.701-702

5.2.2.1 Requirement

The process weight limitations apply to any process or process equipment at a facility, and establish PM emission limits based on process weight. The line No. 1 dryer and fryer are subject to IDAPA 58.01.01.701 because they were installed in 1995 and 1998, respectively, while the line No. 4 and 6 dryers and fryers are subject to IDAPA 58.01.01.702 because they were in operation prior to October 1, 1979. The dryers do not qualify for the fuel-burning exemptions (IDAPA 58.01.01.701.02 and 702.02(a)) because they are direct-fire dryers.

5.2.2.2 Monitoring, Recordkeeping, and Reporting

Appendix A of this memorandum contains calculations that show compliance with process weight PM limitations, based on continuous operation at rated capacities. Therefore, as long as the permittee uses only natural gas in the dryers, the permittee is in compliance with the grain-loading standard.

5.2.3 Production Line No. 1/PM Emission Limit, PTC No. 027-00009

5.2.3.1 Requirement

Permit Condition 1.1 of PTC No. 027-00009, dated December 31, 1997, establishes hourly and annual emission rate limits for PM emissions from the line No. 1 fryer. In accordance with IDAPA 58.01.01.322.01, this is an applicable requirement for the Tier I operating permit.

5.2.3.2 Monitoring, Recordkeeping, and Reporting

Permit Condition 2.13 requires Simplot to conduct a compliance test on the line No. 1 fryer in the first year of the five-year Tier I operating permit term for PM emissions. This permit condition also requires Simplot to monitor throughput during the compliance test. Permit Condition 2.5 sets a throughput rate limit for the fryer.

Permit Condition 2.14 requires further source testing should the results of the initial source test be within 75% of the limit specified in Permit Condition 2.3, and yearly source testing if the initial source test is within 90% of the limit specified in Permit Condition 2.3. These provisions assure compliance with Permit Condition 2.3 of the Tier I operating permit.

Permit Condition 2.18 contains reporting requirements for the compliance test.

5.2.4 Production Line No. 1/Visible Emissions, PTC No. 027-00009

5.2.4.1 Requirement

Permit Condition 1.2 of PTC No. 027-00009, dated December 31, 1997, establishes a visible emissions limit for the line No. 1 fryer. In accordance with IDAPA 58.01.01.322.01, this is an applicable regulation for the Tier I operating permit.

The facility-wide conditions of the Tier I operating permit stipulate requirements for visible emissions (Permit Conditions 1.7-1.8). In order to reduce redundant operating permit requirements, Permit Condition 2.4 states that the permittee shall comply with the facility-wide visible emissions requirements.

5.2.4.2 Monitoring, Recordkeeping, and Reporting

Permit Condition 2.15 of the Tier I operating permit requires the permittee to comply with the facility-wide conditions for monitoring and recording visible emission inspections. Permit Condition 2.16 requires the permittee submit a summary report of the data acquired from the visible emissions inspections.

5.2.5 Production Line No. 1/Throughput Limit, PTC No. 027-00009

5.2.5.1 Requirement

Permit Condition 2.1 of PTC No. 027-00009, dated December 31, 1997, establishes a rolling 12-month throughput limit for the line No. 1 fryer. In accordance with IDAPA 58.01.01.322.01, this is an applicable regulation for the Tier I operating permit.

5.2.5.2 Monitoring, Recordkeeping, and Reporting

Permit Condition 2.11 of the Tier I operating permit requires the permittee to monitor and record the monthly finished product from the dryer. Permit Condition 2.16 requires the permittee to submit a summary report of the product monitoring data once every six months.

5.2.6 Operating Requirements for Pollution Control Equipment, PTC No. 027-00009

5.2.6.1 Requirements

Permit Conditions 2.4 and 2.5 of PTC No. 027-00009, dated December 31, 1997, establish operating requirements for the pressure drop and the scrubbing media flow rate of the air pollution control device on the line No. 1 fryers. In accordance with IDAPA 58.01.01.322.01, this is an applicable regulation for the Tier I operating permit.

5.2.6.2 Monitoring, Recordkeeping, and Reporting

Permit Condition 2.12 of the Tier I operating permit requires the permittee to monitor and record the pressure drop and scrubbing media flow rate of the air pollution control equipment. Permit Condition 2.16 requires the permittee to submit a summary report of the monitoring data once every six months. Permit Condition 2.17 requires the permittee to report any instance when the measurements of the pressure drop and scrubbing media flow rate of the air pollution control equipment are less than 30% of the lowest values obtained during the most recent compliance test that demonstrated compliance.

5.3 EMISSIONS UNIT – STEAM GENERATING PLANT

5.3.1 Emissions Unit Description

The steam generating plant consists of three natural gas-fired boilers that supply steam to the potato processing plant and the ethanol plant. The Kewanee boiler (Unit No. S-C-B8) was installed in 1966 and has a rated capacity of 80.8 MMBtu/hr. The remaining two boilers are both Cleaver-Brooks boilers with rated capacities of 102.8 MMBtu/hr. The first Cleaver-Brooks boiler (Unit No. S-C-B9) was installed in 1969, and the second Cleaver-Brooks boiler (Unit No. S-C-B10) was installed in 1972.

There are currently no control devices on the boilers. Combustion emissions for the boilers are based on continuous operation at burner capacity.

5.3.2 Grain-loading Standard, IDAPA 58.01.01.677

5.3.2.1 Requirement

Permit Condition 3.1 is a paraphrase of IDAPA 58.01.01.677, and is applicable to all three boilers, since the boilers have been in operation prior to 1979 and are natural gas-fueled. Therefore, in accordance with IDAPA 58.01.01.322.01, this is an applicable Tier I operating permit standard.

5.3.2.2 Monitoring, Recordkeeping, and Reporting

Permit Condition 3.2 states that the boilers may only be fired with natural gas. Appendix B of this memorandum contains calculations that show compliance with the grain-loading standard, using AP-42 emissions factors for natural gas combustion. Emissions factors given in AP-42 are generally accepted as conservative estimates. Even a conservative estimate of emissions from natural gas combustion results in an approximated grain loading well below the standard of 0.015 gr/dscf. Therefore, as long as the permittee uses only natural gas in the boilers, the permittee is in compliance with the grain-loading standard.

5.4 EMISSIONS UNIT – HEATER S-C-H5

5.4.1 Emissions Unit Description

There is one natural gas-fired heating unit (S-C-H5) used to heat the plant that does not qualify as an insignificant activity. This heater has a rated capacity of 10.1 MMBtu/hr and was installed on January 15, 1991.

Emissions from the heaters are released to the atmosphere through building vents. Combustion emissions for the heaters are based on continuous operation at burner capacity, assuming all emissions are released to the atmosphere.

5.4.2 Grain-Loading Standard, IDAPA 58.01.01.676

5.4.2.1 Requirement

Permit Condition 4.1 is a paraphrase of IDAPA 58.01.01.676, and is applicable to heater S-C-H5, since the heater was installed in 1991, has a rated capacity greater than 10 MMBtu/hr, and is natural gas-fueled. Therefore, in accordance with IDAPA 58.01.01.322.01, this is an applicable Tier I operating permit standard.

5.4.2.2 Monitoring, Recordkeeping, and Reporting

Permit Condition 4.2 states that the heater may only be fired with natural gas. Appendix B of this memorandum contains calculations that show compliance with the grain-loading standard, using AP-42 emissions factors for natural gas combustion. Emissions factors given in AP-42 are generally accepted as conservative estimates. Even a conservative estimate of emissions from natural gas combustion results in an approximated grain loading well below the standard of 0.015 gr/dscf. So long as heater S-C-H5 is fired with natural gas, compliance with Permit Condition 4.1 is demonstrated.

5.5 EMISSIONS UNIT – BIOGAS UNIT

5.5.1 Emissions Unit Description

Gases produced by the ADI-BVF anaerobic digester at the wastewater treatment facility are referred to as biogases. The biogas primarily consists of methane, carbon dioxide, and H_2S. These gases are collected and routed to the ADI-BVF digester flare (Unit No. S-C-BF) equipped with a natural gas-fired pilot light. The flare combusts the biogas to form carbon dioxide, SO_2, and water, which is vented to the atmosphere. The ADI-BVF anaerobic digester and biogas flare were originally permitted for construction in PTC No. 027-00009, dated December 17, 1997. The PTC was amended on December 10, 1997.

5.5.2 Sulfur Dioxide Emissions Limit, PTC No. 027-00009

5.5.2.1 Requirement

Permit Condition 1.1 of PTC No. 027-00009, dated December 10, 2001, establishes an annual emissions rate limit for SO_2 emissions from the waste flare. In accordance with IDAPA 58.01.01.322.01, this is an applicable regulation for the Tier I operating permit.

5.5.2.2 Monitoring, Recordkeeping, and Reporting

Emissions of SO_2 from the waste flare are directly dependent upon the COD reduction in the ADI-BVF digester. Permit Condition 5.4 of the Tier I operating permit limits the COD reduction of the digester such that SO_2 emissions from the flare cannot exceed the emissions limit. Therefore, the monitoring,

recordkeeping, and reporting requirements for Permit Condition 5.1 of the Tier I operating permit are satisfied by the monitoring, recordkeeping, and reporting requirements for Permit Condition 5.4 (refer to Section 5.5.5 below), and no further compliance demonstration is required.

5.5.3 H_2S Concentration Limit, PTC No. 027-00009

5.5.3.1 Requirement

Permit Condition 2.1 of PTC No. 027-00009, dated December 10, 2001, establishes a H_2S concentration limit for the biogas fed to the waste flare. In accordance with IDAPA 58.01.01.322.01, this is an applicable regulation for the Tier I operating permit.

5.5.3.2 Monitoring, Recordkeeping, and Reporting

Permit Conditions 5.10 of the Tier I operating permit requires the permittee to conduct a compliance test for H_2S within the first year of the five-year Tier I operating permit term. Permit Condition 5.11 stipulates terms and conditions for requiring additional compliance testing should the results of the initial compliance test not clearly establish a compliance demonstration.

Permit Condition 5.14 of the Tier I operating permit requires that the permittee report the results of the compliance test(s) to DEQ and EPA.

5.5.4 Visible Emissions, PTC No. 027-00009

5.5.4.1 Requirement

Permit Condition 1.2 of PTC No. 027-00009, dated December 10, 2001, establishes a visible emissions limit for the ADI-BVF digester and waste flare. In accordance with IDAPA 58.01.01.322.01, this is an applicable regulation for the Tier I operating permit.

The facility-wide conditions of the Tier I operating permit stipulate requirements for visible emissions (Permit Conditions 1.7-1.8). In order to reduce redundant permit requirements, Permit Condition 5.3 states that the permittee shall comply with the facility-wide visible emissions requirements.

5.5.4.2 Monitoring, Recordkeeping, and Reporting

Permit Condition 5.12 of the Tier I operating permit requires the permittee to comply with the facility-wide conditions for monitoring and recording visible emissions inspections. Permit Condition 5.13 requires the permittee to submit a summary report of data acquired from the visible emissions inspections.

5.5.5 Chemical Oxygen Demand Concentration Limit, PTC No. 027-00009

5.5.5.1 Requirement

Permit Condition 2.2 of PTC No. 027-00009, dated December 10, 2001, establishes a limit on the average COD reduction in the wastewater in the ADI-BVF digester during any 12-month period. In accordance with IDAPA 58.01.01.322.01, this is an applicable regulation for the Tier I operating permit.

5.5.5.2 Monitoring, Recordkeeping, and Reporting

Permit Condition 5.8 of the Tier I operating permit requires the permittee to monitor the COD concentration of the wastewater on a monthly basis. The permittee is also required to calculate a 12-month average concentration, based on the monthly COD concentrations. Permit Condition 5.13 requires the permittee to submit a summary report of the COD concentration data every six months.

5.5.6 Flare Operating Requirement, PTC No. 027-00009

5.5.6.1 Requirement

Permit Condition 2.3 of PTC No. 027-00009, dated December 10, 2001, requires that the flare be operated with a pilot flame present at all times. In accordance with IDAPA 58.01.01.322.01, this is an applicable regulation for the Tier I operating permit.

5.5.6.2 Monitoring, Recordkeeping, and Reporting

Permit Condition 5.9 of the Tier I operating permit requires the permittee to operate a device to detect the presence of the pilot flame. This permit condition also requires the permittee to maintain a log detailing events when the pilot flame is not in operation. Permit Condition 5.13 requires the permittee to submit a summary report of the flare operation data every six months.

5.5.7 Rules for the Control of Incinerators, IDAPA 58.01.01.785-787

5.5.7.1 Requirement

Permit Condition 5.8 of the Tier I operating permit is a paraphrase of IDAPA 58.01.01.786.01, and establishes a limit on particulate discharged from the waste flare. In accordance with IDAPA 58.01.01.006.51, the waste flare is an incinerator and is subject to the provisions of IDAPA 58.01.01.785-787. In accordance with IDAPA 58.01.01.322.01, this is an applicable regulation for the Tier I operating permit.

5.5.7.2 Monitoring, Recordkeeping, and Reporting

A Method 5 particulate test is specified in IDAPA 58.01.01.786.03 as a means to show compliance with IDAPA 58.01.01.786.01 for incinerators. A standard Method 5 particulate test on the flare outlet is not possible due to high temperatures and a lack of stack above the flame. Therefore, particulate matter testing to actually demonstrate compliance with the standard is not possible. The opacity standard and opacity monitoring requirements for the flare (Permit Conditions 5.3 and 5.12, respectively) will be used as a surrogate for monitoring particulate matter emissions. Visible emissions monitoring is specified as a method for compliance determination for flare operations in 40 CFR 63.11; and is therefore determined to be sufficient to show compliance with IDAPA 58.01.01.785-787.

Permit Condition 5.13 requires the permittee to submit a summary report of data acquired from the visible emissions inspections.

5.5.8 Non-applicability Determinations

5.5.8.1 Grain-loading Standard, IDAPA 58.01.01.675

The grain-loading standard does not apply to the biogas unit because the waste flare does not meet the definition of fuel burning equipment (IDAPA 58.01.01.006.41). The waste flare is defined as an incinerator (IDAPA 58.01.01.006.51), and does not burn fuel for the purpose of producing heat or power by indirect heat transfer.

5.5.8.2 Process Weight Limitations, IDAPA 58.01.01.700

The process weight limitation does not apply to the biogas unit because the waste flare does not meet the definition of process or process equipment (IDAPA 58.01.01.006.79). The waste flare is an incinerator (IDAPA 58.01.01.006.51), which is defined as a source designed for the destruction of refuse by burning.

5.6 EMISSIONS UNIT – ETHANOL PRODUCTION PLANT

5.6.1 Emissions Unit Description

A description of the ethanol production plant can be found in Section 4.1.2 of this technical memorandum. There are two air emissions point sources associated with the ethanol plant, and both sources primarily emit VOCs. The first is referred to as ethanol production (Unit No. S-C-E1), while the second source is the tank vents on the ethanol storage tanks (Unit No. S-C-E2).

The ethanol plant was installed in 1985 and produces 5,000,000 gallons of ethanol per year. Emissions from ethanol production (cooking, fermentation, and distillation) are collected and vented to the atmosphere. The emissions factor for ethanol production is taken from EPA Document Number EPA 450/4-90-003.

There are four underground ethanol storage tanks with capacities of 50,000 gallons each. These tanks were constructed in 1985. Emissions estimates for the storage tanks are based on the Storage Tank Emissions Calculation Software (version 2.0) distributed by EPA.

Since there are no PM emissions associated with the ethanol production plant, fugitive PM emission limits (IDAPA 58.01.01.650-651) were not specifically applied to this emissions unit. However, it should be noted that the facility-wide conditions in the Tier I operating permit require compliance with IDAPA 58.01.01.650-651.

5.6.2 Visible Emissions, IDAPA 58.01.01.625

5.6.2.1 Requirement

IDAPA 58.01.01.625 states that "*A person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater then twenty percent (20%) opacity....*" In accordance with IDAPA 58.01.01.322.01, this is an applicable regulation for the Tier I operating permit.

The facility-wide conditions of the Tier I operating permit stipulate requirements for visible emissions (Permit Conditions 1.7-1.8). In order to reduce redundant permit requirements, Permit Condition 6.1 states that the permittee shall comply with the facility-wide visible emissions requirements.

5.6.2.2 Monitoring, Recordkeeping, and Reporting

Permit Condition 6.2 of the Tier I operating permit requires the permittee to comply with the facility-wide conditions for monitoring and recording visible emission inspections. Permit Condition 6.5 requires the permittee to submit a summary report of the data acquired from the visible emissions inspections.

5.6.3 New Source Performance Standard, 40 CFR 60, Subpart Kb

5.6.3.1 Requirements

In accordance with 40 CFR 60.110b, the four ethanol storage tanks are subject to the NSPS. The size of the tanks is greater than 151 m^3 and the maximum true vapor pressure exceeds 3.5 kPa (refer to Appendix C of this technical memorandum for the maximum true vapor pressure calculation); therefore, these tanks are subject to the monitoring required in 40 CFR 60.116b(a)-(c). Section 60.116b(b) requires the facility to maintain, for the life of the source, records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Section 60.116b(c) requires the facility to maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the period of storage.

5.6.3.2 Monitoring, Recordkeeping, and Reporting

Monitoring and recordkeeping requirements are contained within Permit Conditions 6.3 and 6.4. Reporting requirements are contained in Permit Conditions 6.5 and 6.6. Permit Condition 6.6 is a one-time reporting requirement for tank parameters. These requirements are self-explanatory.

6. *INSIGNIFICANT ACTIVITIES*

Insignificant activities described by the source in accordance with IDAPA 58.01.01.317.01(b) are listed in Table 6.1. Emissions calculations showing compliance with the provisions of IDAPA 58.01.01.317.01(b)(i)(30) are available in the Simplot Tier I operating permit application. The calculations were reviewed and found to be consistent with current DEQ methodology.

Table 6.1 Insignificant Activities

Description	Insignificant Activities Section Citation IDAPA 58.01.01.317.01(b)(i)
Storage tanks and vessels with less than 260-gallon capacity with appropriate closures	IDAPA 58.01.01.317.01(b)(i)(1)
Storage tanks and vessels with less than 1,100-gallon capacity with appropriate closures, not for use with hazardous air pollutants and with a maximum vapor pressure of 550 mmHg	IDAPA 58.01.01.317.01(b)(i)(2)
Unleaded gasoline storage tank and off-specification ethanol storage tank	IDAPA 58.01.01.317.01(b)(i)(3)
Propane storage tank	IDAPA 58.01.01.317.01(b)(i)(4)
Various natural gas-fired air makeup units rated less than five MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(5)
Various combustion sources rated less than 5 MMBtu/hr, containing less than 0.4% by weight sulfur for coal or less than 1% by weight for other fuels	IDAPA 58.01.01.317.01(b)(i)(6)
Diesel-fired emergency generators rated less than 1 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(7)
Welding using less than 1 T/day of welding rod	IDAPA 58.01.01.317.01(b)(i)(9)
Ink used to print on packaging using less than 2 gal/day	IDAPA 58.01.01.317.01(b)(i)(12)
Various water-cooling towers that are non-process-contact coolers and not greater than 10,000 gal/min	IDAPA 58.01.01.317.01(b)(i)(13)
Water chlorination less than 20,000,000 gal/day	IDAPA 58.01.01.317.01(b)(i)(16)
Natural gas, propane, or kerosene-fired space heaters rated less than 5 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(18)
Equipment used to exclusively pump, load, and store vegetable oil	IDAPA 58.01.01.317.01(b)(i)(20)
Cleaning and stripping activities and equipment using solutions with less than 1% VOCs by weight	IDAPA 58.01.01.317.01(b)(i)(26)
Storage and handling of water-based lubricants for metal working with an organic content of less than 10%	IDAPA 58.01.01.317.01(b)(i)(27)
Heaters S-C-H4, S-C-H6, S-C-H7, S-C-H8, S-C-H9, S-C-H10, S-C-H11, S-C-H12	IDAPA 58.01.01.317.01(b)(i)(30)

7. *ALTERNATIVE OPERATING SCENARIOS*

No alternative operating scenarios were identified by the facility.

8. *TRADING SCENARIOS*

There were no trading scenarios requested by the facility.

9. *COMPLIANCE SCHEDULE AND COMPLIANCE CERTIFICATION*

9.1 COMPLIANCE PLAN

Pursuant to the information submitted by J.R. Simplot Co. in the May 23, 1995 Tier I operating permit (Tier I) application, J.R. Simplot Co. has not obtained permits to construct (PTCs) for construction and/or modification of all emission sources at the facility in accordance with IDAPA 58.01.01.200 through 223. The following sources were specifically identified that were required to, but did not obtain, a PTC:

- The ethanol production plant
- The four ethanol storage tanks

In 1998, a consent order was issued to address the enforcement aspect of the failure to obtain any PTC for these two sources; however, no permit has been issued to address applicable permitting aspects. In addition, the permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.

Because these sources have been constructed and/or modified without a permit, the Department has determined that the most appropriate course of action to bring the facility into compliance with the requirements is to issue a single facility-wide permit that:

(a) Specifically establishes the operating terms and conditions required by the PTC rules for sources for which a permit was required but not obtained; and

(b) Collectively addresses the operating terms and conditions required to demonstrate that emissions from all sources at the facility will not contribute to the violation of an applicable standard.

The Department is, therefore, requiring a combined Tier II operating permit (Tier II) and PTC (hereafter referred to as the facility-wide permit). The Tier II for J.R. Simplot Co. is required in accordance with IDAPA 58.01.01.401.03 based on the determination that specific emission standards, or requirements on operation or maintenance, are necessary to ensure compliance with any applicable emission standard or rule. The facility-wide permit will contain the terms and conditions necessary for the facility to comply with the applicable requirements of IDAPA 58.01.01.400 through 410.

The facility-wide permit will also include all of the terms and conditions for new or modified sources. For those sources within the facility that have existing PTCs, the terms and conditions will be incorporated into the new permit. For sources at the facility for which a PTC was required but not obtained, the permit will establish new emission limits, controls, and other requirements in accordance with the applicable portions of IDAPA 58.01.01.200 through 223. The new facility-wide permit will address all applicable emission standards, required emission control technology, and demonstrate that the facility will not cause or contribute to any ambient air quality standard or applicable prevention of significant deterioration (PSD) increment.

The combined Tier II and PTC is different than, and separate from, the Tier I in that the new permit will establish new applicable emission limits, controls, and other requirements that are as stringent as the requirements contained in or enforceable under the state implementation plan. This permit will create new underlying requirements for sources that are in existence at the time the initial Tier I is issued. A Tier I permit modification will, therefore, need to be issued concurrently with the issuance of the new facility-wide permit.

The applicable requirements established in the facility-wide permit pursuant to IDAPA 58.01.01.200 through 223 shall be clearly identified as such in the permit and shall remain in full force and effect until such time as they are modified or terminated in accordance with the procedures for issuing a PTC.

The specific compliance schedule elements and milestones to achieve compliance are described below.

Permit Condition 8.2. The permittee will be required to submit a complete permit application with all supporting information and documentation for issuance of a facility-wide permit in accordance with IDAPA 58.01.01.400 through 410 no later than 180 days from the final issuance date of the Tier I. A facility-wide permit is required by the Department to establish the terms and conditions necessary to comply with an applicable rule or standard. The Department shall consider the emissions from all sources at the facility and the specific requirements for individual sources in preparing the facility-wide operating permit.

The permit application shall clearly identify all emissions units at the facility - listing currently permitted emissions units, exempted units for which the facility maintains exemption documentation, units constructed before and not modified since January 24, 1969, and units constructed and/or modified since January 24, 1969 without a permit or construction approval from the Department. Application information shall provide facility information and emissions data for all emissions units in accordance with IDAPA 58.01.01.402 and 403 and shall include a demonstration that the sources at the facility will not cause or significantly contribute to a violation of the NAAQS or of any applicable PSD increment.

The application submittal deadlines have been set to reasonably accommodate updating and organizing the emissions unit descriptions and emissions data, and conducting ambient air quality modeling for all sources. Applications that are deemed or remain incomplete beyond the 180-day milestone shall constitute a violation of this permit condition.

Permit Condition 8.3. In addition to the information submitted under Permit Condition 8.2, the permittee is required to submit all of the information necessary to address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 and the NSPS requirements in 40 CFR 60, Subpart KB for the construction and/or modification of sources for which the permittee was required but did not obtain a PTC. The information must include all information to address the additional permit requirements for new major facilities or major modifications where construction without enforceable limits may have triggered PSD or nonattainment new source review (NSR) requirements.

This data must be submitted with the complete permit application required under Permit Condition 8.2 in order to issue a single combined permit. The information is, therefore, due no later than 180 days from the final issuance date of the Tier I. Failure to include complete information for addressing the PTC requirements within the required timeframe shall constitute a violation of this permit condition.

Permit Condition 8.4. If through the development of the facility-wide permit, any other source or sources are identified that should have obtained a PTC or PTC modification and for which the applicant did not include the information under Permit Condition 8.3, a supplemental application that contains all of the information necessary to address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223, and the NSPS requirements in 40 CFR 60, Subpart KB, shall be submitted no later than 30 days after receiving written notification from the Department. Supplemental applications that are deemed or remain incomplete beyond the 30-day milestone shall constitute a violation of this permit condition.

Permit Condition 8.5. If the permittee can clearly demonstrate that the data required for the facility-wide permit cannot be collected and organized within the specified timeframe, the permit application submittal deadlines may be extended at the discretion of the Department for a specific time period not to exceed one year. For the Department to consider a request for an extension without jeopardizing the terms and conditions of the permit, the request must be submitted by the facility no later than the midpoint of the compliance milestone timeline. The request must be submitted in writing with a clear demonstration why the data cannot reasonably be submitted within the specified timeframe. An example of information that might justify an extension is the absence of ambient monitoring data required to complete a PSD application.

The Department will review the request and the justification and approve or disapprove the extension in writing. The responsibility for meeting the schedule if the Department has not issued a written extension belongs to the permittee.

Permit Condition 8.6. The Department intends to draft and issue a single facility-wide permit to bring the permittee back into compliance. This permit will fully meet all of the applicable requirements in the *Rules* and the federally approved state implementation plan. Because the permit will contain both elements of PTCs and of Tier II permits, it will clearly identify the origin and basis for each term and condition. The terms and conditions established pursuant to the PTC requirements shall be clearly marked and shall not expire with any Tier II operating permit term. The terms and conditions established pursuant to the Tier II requirements shall be clearly marked and shall be implemented in accordance with the Tier II process. The procedures for issuing a PTC in IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II in IDAPA 58.01.01.404. The permit shall clearly state that any future modification of a term or condition in the permit shall be subject to the appropriate procedural requirements on which the original term or condition was based.

Permit Condition 8.7. Within 30 days after the Department determines the facility-wide permit application is complete, the permittee will need to request a significant permit modification to the Tier I in accordance with IDAPA 58.01.01.382.02. A significant Tier I modification will require the payment of fees in accordance with IDAPA 58.01.01.389.06.b.iii. Because the information in a complete application as required under Permit Condition 8.2 and 8.3 should contain all of the technical information necessary to modify the Tier I, the Department may waive portions of the standard application requirements as appropriate provided the permittee certifies the completeness, truth, and accuracy of all documents submitted.

The Tier I modification shall be processed concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I in IDAPA 58.01.01.360 through 369.

Permit Condition 8.8. The permittee shall be required to submit a progress report at the end of each calendar quarter (January 1, April 1, July 1, and October 1) of each year stating when each of the conditions of each milestone were or will be achieved. A detailed explanation is required when milestones were not or will not be achieved in accordance with the schedule.

Permit Condition 8.9. The incorporation of the compliance schedule into the Tier I operating permit does not sanction noncompliance with the applicable rules.

10. ***ACID RAIN PERMIT***

This does not apply to the Simplot facility.

11. *AIRS DATABASE*

This permit does not represent a new source at the Simplot facility; therefore, no Abbreviated AIRS Data Entry Sheet is required.

Table 11.1 AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

Air Program Description	SIP	PSD	NESHAP	NSPS	MACT	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N - Nonattainment
SO_2	A					A	U
NOx	A					A	U
CO	A					A	U
PM_{10}	A					A	U
PM	A					A	U
VOC	B			B		~~B~~	U
Total HAPs							U

Aerometeric Information Retrieval System/AIRS Facility Subsystem KO

AIRS/AFS classification codes:

A = actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the ten ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.

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).

12. *REGISTRATION FEES*

This facility is a major facility as defined by IDAPA 58.01.01.008.10, and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387.

13. *RECOMMENDATION*

Based on the Tier I application and review of the federal regulations and state rules, staff recommends that DEQ issue final Tier I operating permit No. 027-00009 to the JR Simplot Co. for their Caldwell facility.

SO/BR: tk Project No. T1-9505-059-1 G:\Air Quality\Stationary Source\SS Ltd\T1\JRS Cldwll\Final\JRS Caldwell Final TM.doc

cc: Sherry Davis, Technical Services Laurie Kral, EPA Region 10 Mike McGown, Boise Regional Office

APPENDIX A

Process Weight Calculations for the Dryers and Fryers

J.R. Simplot, Caldwell/P-9505-059-1

Idaho Department of Environmental Quality
Office of Technical Services

CALCULATION SHEET

Sheet 1 of 3

t J.R. SIMPLOT, CALDWELL TIER 1 OP Work Order P-9505-059-1 File No.

f Calculation PWR FOR DRYERS / FRYERS Prepared By [signature] Date

APPENDIX A - LINE NO. 1 Checked By Date 1/25/02

LINE NO. 1: 1) DRYER

a. KNOWNS: PM EMISSIONS FOR NAT GAS: 7.6 lb/mmscf (AP-42, 1.4-2)
BURNER CAPACITY: 5.5 mmBTU/hr
PROCESS CAPACITY: 75000 lb/8 hr = 9375 lb PROD/hr
PM-10 EMISSION FACTOR/PROCESS: 0.066 lb PM/mlb PRODUCT
→ ASSUME 100% PM-10 = 100% PM
} T1 APPLIC.

b. EMISSION CALCULATION:
- BURNER: $5.5 \frac{mmBTU}{hr}\left(\frac{cf}{1050\ BTU}\right)(7.6\ lb\ PM/mmcf) = 0.04\ lb\ PM/hr$
- PROCESS: $9375 \frac{lb\ PROD}{hr}(0.066\ lb\ PM/1000\ lb\ PROD) = 0.62\ lb\ PM/hr$

TOTAL = 0.66 lb PM/hr

c. PWR STANDARD (IDAPA 58.01.01.701):

$E = 1.10(PW)^{0.25} = 1.1(9375)^{0.25}$
$= 10.82\ lb\ PM/hr$

∴ SINCE 10.82 lb/hr >> 0.66 lb/hr, COMPLIANCE IS DEMONSTRATED*

2) FRYER

a. KNOWNS: PROCESS CAPACITY = 75000 lb/8hr = 9375 lb PROD/hr
EMISSION FACTOR: 0.52 lb PM10/mlb PRODUCT
→ ASSUME 100% PM-10 = 100% PM
} T1 APPLIC.

b. EMISSION CALC: 9375 lb PROD/hr (0.52 lb PM/1000 lb PROD) = 4.88 lb/hr

c. STANDARD (IDAPA 58.01.01.701):

$E = 1.1(PW)^{0.25} = 1.1(9375)^{0.25} = 10.82\ lb\ PM/hr$

∴ SINCE 10.82 lb/hr >> 4.88 lb/hr, COMPLIANCE IS DEMONSTRATED*

* SOURCE TESTS CONDUCTED ON 10/16 & 17/00 ALSO DEMONSTRATE COMPLIANCE (DEQ-APPROVED).

10-01-01

Idaho Department of Environmental Quality
Office of Technical Services

CALCULATION SHEET

Sheet 2 of 3

ject _____ Work Order _____ File No. _____

e of Calculation _____ Prepared By [signature] Date _____

n APPENDIX A - LINE NO. 4 Checked By _____ Date _____

- LINE NO. 4: 1) DRYER a. KNOWNS: PM EMISSION FACTOR FOR NAT. GAS: 7.6 lb/MMscf (AP-42)
BURNER CAPACITY: 16 MMBTU/hr
PROCESS CAPACITY: 260000 lb/8hr = 32500 lb PROD/hr
PM-10 EMISSION FACTOR/PROCESS: 0.066 lb PM/M lb PRODUCT
→ ASSUME 100% PM-10 = 100% PM
} T2 APPLIC.

b. EMISSION CALC:
- BURNER: 16 MMBTU/hr $\left(\frac{cf}{1050\ BTU}\right)$ (7.6 lb PM/MMscf)
= 0.12 lb PM/hr
- PROCESS: 32500 lb PROD/hr (0.066 lb PM/1000 lb PROD)
= 2.15 lb PM/hr
TOTAL = 2.27 lb PM/hr

c. PNR STANDARD (IDAPA 58.01.01.702)
$E = 1.12(PW)^{0.27} = 1.12(32500)^{0.27}$
= 18.51 lb/hr
∴ SINCE 18.51 lb/hr ≫ 2.27 lb/hr, COMPLIANCE IS DEMONSTRATED*

2) FRYER a. KNOWNS: PROCESS CAPACITY = 32500 lb PROD/hr
EMISSION FACTOR = 0.22 lb PM/M lb PROD
→ ASSUME 100% PM-10 = 100% PM
} T1 APPLICATION

b. EMISSION CALC:
32500 lb PROD/hr (0.22 lb PM/1000 lb PROD)
= 7.15 lb PM/hr

c. PNR STANDARD (IDAPA 58.01.01.702):
$E = 1.12(PW)^{0.27} = 1.12(32500)^{0.27} = 18.51$ lb/hr
∴ SINCE 18.51 lb/hr ≫ 7.15 lb/hr, COMPLIANCE IS DEMONSTRATED*

* DEQ APPROVED SOURCE TESTS CONDUCTED ON 10/18 & 19/00 ALSO DEMONSTRATE COMPLIANCE.

10-01-01

Idaho Department of Environmental Quality
Office of Technical Services

CALCULATION SHEET

Sheet 3 of 3

ject _____ Work Order _____ File No. _____

e of Calculation _____ Prepared By _____ Date _____

n APPENDIX A - LINE NO. 6 Checked By _____ Date _____

- LINE NO. 6: 1) DRYER a. KNOWNS: PM EMISSION FACTOR FOR NAT. GAS: 7.6 lb PM/mmscf (AP-42)
BURNER CAPACITY: 28 mmBTU/hr
PROCESS CAPACITY: 270000 lb/8hr = 33750 lb PROD/hr } T2 APPLIC.
PM-10 EMISSION FACTOR/PROCESS: 0.066 lb PM/1000 lb PROD
→ ASSUME 100% PM-10 = 100% PM

b. EMISSION CALC:
- BURNER: 28 mmBTU/hr $\left(\frac{cf}{1050 BTU}\right)$ (7.6 lb PM/mmscf)
= 0.20 lb PM/hr
- PROCESS: 33750 lb PROD/hr (0.066 lb PM/1000 lb PROD)
= 2.23 lb PM/hr
TOTAL = 2.43 lb PM/hr

c. PWR STANDARD (IDAPA 58.01.01.702):
$E = 1.12(P_W)^{0.27} = 1.12(33750)^{0.27}$
= 18.70 lb/hr

∴ SINCE 18.70 lb/hr ≫ 2.43 lb/hr, COMPLIANCE IS DEMONSTRATED*

2) FRYER a. KNOWNS: PROCESS CAPACITY = 33750 lb PROD/hr } T2 APPLICATION
EMISSION FACTOR = 0.22 lb PM/1000 lb PRODUCT
→ ASSUME 100% PM-10 = 100% PM

b. EMISSION CALC:
33750 lb PROD/hr (0.22 lb PM/1000 lb PROD) = 7.43 lb PM/hr

c. PWR STANDARD (IDAPA 58.01.01.702):
$E = 1.12(P_W)^{0.27} = 1.12(33750)^{0.27} = 18.70$ lb/hr

∴ SINCE 18.70 lb/hr ≫ 7.43 lb/hr, COMPLIANCE IS DEMONSTRATED*

* DEQ-APPROVED SOURCE TESTS CONDUCTED ON 10/14 & 15/00 ALSO DEMONSTRATE COMPLIANCE

APPENDIX B

Grain-Loading Calculations for the Boilers and Heater

J.R. Simplot, Caldwell/P-9505-059-1

Idaho Department of Environmental Quality
Office of Technical Services

CALCULATION SHEET

Sheet 1 of 1

ect J.R. Simplot, Caldwell Ter 1 OP Work Order P-9505-057-1 File No.

of Calculation Grain-loading for Boilers & Heater Prepared By SEG Date 1/25/02

Appendix B Checked By Date

Knowns: 1) PM emission factor for nat. gas combustion (Table 1.4-2, AP-42): 7.6 lb/MMscf
2) Dry standard cubic feet (dscf) of flue gas produced from combustion of 1 MMBtu of Nat. Gas (40 CFR, App. A, Method 19): 8710 dscf/MMBtu
3) Ave. heat content of nat. gas: 1050 Btu/ft³
4) Caldwell elevation: 2400 ft (www.topozone.com)
5) Standard conditions: 68°F, 29.92 in Hg

Calculation:
1) Altitude correction (IDAPA 58.01.01.63.a):

$$29.92 \text{ in Hg} - (0.1 \times 2400) \text{ in Hg} = \underline{27.52 \text{ in Hg}}$$

2) Gas Volume Correction (Ideal Gas Law w/constant n, R, and T):

$$V_2 = \frac{P_1 V_1}{P_2} = \frac{(29.92 \text{ in Hg})(8710 \text{ ft}^3)}{(27.52 \text{ in Hg})}$$

$$= \underline{9470 \text{ ft}^3}$$

3) For 3% O_2 (40 CFR, App. A, Method 19):

$$F_2 = F_1 \left(\frac{20.9}{20.9 - 3.0}\right) = (9470 \text{ ft}^3)\left(\frac{20.9}{20.9 - 3.0}\right)$$

$$= \underline{11057 \text{ ft}^3}$$

4) Grain-loading per cubic foot of flue gas:

$$(7.6 \text{ lb PM}/10^6 \text{ ft}^3 \text{ N.G.})(7000 \text{ gr/lb})\left(\frac{\text{ft}^3 \text{ N.G.}}{1050 \text{ Btu}}\right)\left(\frac{10^6 \text{ Btu}}{11057 \text{ dscf Flue Gas}}\right)$$

$$= \underline{0.0046 \text{ gr/dscf}}$$

10-01-01

APPENDIX C

Maximum True Vapor Pressure Calculation for the Ethanol Storage Tanks

J.R. Simplot, Caldwell/P-9505-059-1

Idaho Department of Environmental Quality
Office of Technical Services

CALCULATION SHEET

Sheet 1 of 1

ct J.R. Simplot, Caldwell Tier 1 OP Work Order P-9505-059-1 File No.

of Calculation True Max Vapor Pressure Prepared By SGG Date 1/25/02

Appendix C Checked By Date

- 4 ethanol storage tanks (50,000 gal/ea capacities)
- Maximum monthly average temperature (for yr 2001)* = 74.0°F
  = 23.3°C
  = 296.5 K
- Max. True Vapor Pressure (Using Antoine's Equation)**

$$\ln(p^*) = A - \frac{B}{C+T}$$

$$p^* = e^{\left(A - \frac{B}{C+T}\right)}$$

$$p^* = e^{\left(18.5242 - \frac{3578.91}{296.5 - 50.50}\right)}$$

$$p^* = e^{(3.98)}$$

$$= 53.29 \text{ mm Hg}$$

$$= \underline{\underline{7.1 \text{ kPa}}}$$

CHECK:

$$\log_{10}(p^*) = A - \frac{B}{T+C}$$

$$p^* = 10^{\left(8.04494 - \frac{1554.3}{23.3 + 222.7}\right)}$$

$$= 10^{(1.73)}$$

$$= 53.13 \text{ mm Hg}$$

$$= 7.08 \text{ kPa}$$

- References:

*National Weather Service Website

**Antoine's eq'ns and constants taken from:

1) Himmelblau, D.M. "Basic Principles & Calculations in Chemical Engineering." Prentice-Hall. 1989.

2) Felder, R.M. & R.W. Rousseau. "Elementary Principles of Chemical Processes." John Wiley & Sons. 1986.

APPENDIX D

Response to Public Comments

J.R. Simplot, Caldwell/P-9505-059-1

May 9, 2002

STATE OF IDAHO
DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PUBLIC COMMENTS
ON DRAFT AIR QUALITY TIER I OPERATING PERMIT
FOR J. R. SIMPLOT COMPANY, CALDWELL, IDAHO

Introduction

As required by IDAPA 58.01.01.364 (*Rules for the Control of Air Pollution in Idaho*), the Idaho Department of Environmental Quality (Department) provided for public notice and comment, including offering an opportunity for a hearing, on the Tier I operating permit drafted for J.R. Simplot Company's (Simplot), Caldwell, Idaho facility. Public comment packages, which included the application materials, and draft permit and technical memorandum, were made available for public review at the Caldwell Public Library, the Department's Boise Regional Office, and the Department's State Office in Boise. The public comment period was provided from April 8, 2002 through May 8, 2002. Comments were received from the City of Caldwell and the Simplot facility. Those comments regarding the air quality aspects of the draft permit are provided below with the Department's response immediately following. No entity requested a hearing.

Public Comments and Department Responses

Comment 1: **Emissions of Carcinogenic and Hazardous Air Pollutants**

The City of Caldwell submitted comments questioning the nature and amount of any carcinogenic or hazardous air pollutants (specifically formaldehyde, acetic acid, and methanol) emitted by the Simplot facility. The comments received by the Department also express an interest in 1) any efforts underway to lessen emissions of such pollutants and 2) the health impact(s) that such emissions may have upon Caldwell.

Response to 1: In accordance with IDAPA 58.01.01.322, Tier I operating permits must contain provisions necessary to assure compliance with all applicable requirements. A Tier I permit cannot promulgate new applicable requirements, but rather, serves to compile a listing of all existing requirements for a facility, along with provisions necessary to show compliance with these existing requirements. The Tier I operating permit does not involve development or evaluation of any new emissions limits, and the Simplot facility currently has no emissions limits in place for toxic air pollutants (TAPs); therefore, the Tier I permit does not address TAPs.

Permit Conditions 8.1 through 8.4 require Simplot to submit an application for a facility-wide Tier II operating permit. During the development and issuance of this permit, the Department will conduct an evaluation of TAPs emissions from the facility. This evaluation will include quantification and an impact assessment of TAPs emissions, and should address the concerns expressed by this comment.

It should be noted that the emissions of formaldehyde, acetic acid, and methanol associated with ethanol production are only produced when the production process involves drying of the pulp after fermentation. The Simplot facility does not engage in pulp drying; therefore, the facility does not emit any of these pollutants as a result of ethanol production.

Comment 2: **Emergency Episode Abatement Plan**

The City of Caldwell submitted a comment noting that Section 3B of Simplot's

Tier I operating permit application states that the Department has not required Simplot to prepare an Emergency Episode Abatement Plan. The City inquired as to why such a plan has not been required.

Response to 2: IDAPA 58.01.01.550-562 set forth definitions for an air pollution emergency, establish a plan for preventing or alleviating such an emergency, and specify rules for implementing the plan. Section 562 does grant the Department the authority to require specific point sources to submit an Emergency Episode Abatement Plan. Currently, the Simplot facility has not been required to submit such a plan because the Department has no evidence to show that such a plan is necessary.

IDAPA 58.01.01.557-560 requires the Department to notify the public and all significant sources of regulated air pollutants of any emergency situation and the general procedures that are required during the event. Based on the extent of the emergency, Section 561 establishes procedures that shall be followed, and can include a full shut-down of manufacturing facilities if circumstances dictate the need (refer to IDAPA 58.01.01.561.04(c)iii). The requirements of IDAPA 58.01.01.550-562 are sufficient to ensure that public health will be protected in the event of an air pollution emergency, and there is currently no need for a specific abatement plan at the Simplot facility.

Comment 3: **Fugitive Emissions Requirements**

Simplot submitted a comment asserting that the following sentence in Permit Condition 1.1 of the draft permit should be removed from the permit:

> **"Visible emissions shall not be observed leaving the property boundary of the permitted facility for a period or periods aggregating more than three minutes in any 60-minute period."**

Simplot stated that this provision is not present in the *Rules for the Control of Air Pollution in Idaho* and that the provision may be unenforceable as a practical matter.

Response to 3: This permit condition is taken directly from Permit Condition 1.3 of permit to construct (PTC) No. 027-00009, dated December 10, 2001, and is therefore an applicable requirement for the Tier I operating permit in accordance with IDAPA 58.01.01.322.01 (i.e., a requirement determined by the Department to be applicable to the source).

Although the Department acknowledges Simplot's assessment of the provision, the Tier I permitting process is not the appropriate forum for removing the requirement, nor would removing this condition from the Tier I permit alleviate Simplot's burden of compliance with the terms of PTC No. 027-00009. In order to remove the permit condition, Simplot must apply for a revision to PTC No. 027-00009, dated December 10, 2001, in accordance with IDAPA 58.01.01.209.04.

Comment 4: **Visible Emissions Requirements**

Simplot submitted a comment asserting that the visible emissions inspections required by Permit Condition 1.8 of the Tier I operating permit should be specific to emission unit stacks only. This comment lists the dryers, fryers, boilers, and the flare as applicable emission units and stacks.

Response to 4: IDAPA 58.01.01.625 is applicable to "any point of emission". The provision applies to **all** point sources at the facility. Facility-wide Condition 1.8 states:

> "Unless specified elsewhere in this permit, the permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation of each potential source. If any visible emissions are present from any point of emission, the permittee shall take appropriate corrective action as expeditiously as practicable."

The language in Facility-wide Condition 1.8 is appropriate to show compliance with the requirements of IDAPA 58.01.01.625. In order to clarify the inspection requirements as only applicable to point sources, the first sentence in Facility-wide Condition 1.8 has been modified as follows:

> "Unless specified elsewhere in this permit, the permittee shall conduct a quarterly facility-wide inspection of potential point sources of visible emissions during daylight hours and under normal operating conditions."

Comment 5: **Reporting Requirements**

Simplot submitted a comment asserting that there is no provision within Section 322.08(a) of the *Rules for the Control of Air Pollution in Idaho* requiring periodic monitoring to be reported to the U.S. Environmental Protection Agency (EPA). Therefore, Simplot requested that this requirement be removed from Permit Conditions 2.16, 2.17, 2.18, 5.15, and 5.16.

Response to 5: The Department concurs with Simplot that IDAPA 58.01.01.322.08(a) does not require that periodic reported be submitted to EPA. However, IDAPA 58.01.01.322.11 does require that all compliance certifications be reported to both the Department and EPA. Therefore, these permit conditions have not been changed, except to reference IDAPA 58.01.01.322.11 within the citations, as the authority for the provision.

It should be noted that Facility-wide Condition 1.27 also requires Simplot to submit the periodic compliance certification required by General Provision 9.21 to EPA.

Comment 6: **Permit Condition 5.4/Fugitive Emission Requirements**

Permit Condition 5.4 requires Simplot to comply with Facility-wide Condition 1.1 for fugitive emissions. Simplot submitted a comment requesting that Permit Condition 5.4 be removed from the permit to reduce redundant permit conditions.

Response to 6: The Department concurs with Simplot; therefore Permit Condition 5.4 has been removed from the permit. Simplot is still required to comply with the provisions of Facility-wide Condition 1.1.

Comment 7: **Miscellaneous Permit and Technical Memorandum Language and Numbering**

Simplot submitted comments noting several errors concerning references to permit conditions within the permit. Simplot also suggested some minor language changes within the permit and technical memorandum for the purpose of clarity.

Response to 7: DEQ concurs with Simplot; therefore the suggestions submitted have been incorporated into the permit and technical memorandum where appropriate. The reference errors in the permit have also been corrected.