



Tier I Operating Permit No. T1-2009.0119

Final

J.R. Simplot Company-Food Group

Caldwell, Idaho

Facility ID No. 027-00009

October 21, 2009

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Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions including references to the applicable statutory or regulatory provisions for the terms and conditions as required by IDAPA 58.01.01.362

1. INTRODUCTION AND APPLICABILITY

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the denial. This document provides the basis for the administrative amendment for the Tier I operating permit for J.R. Simplot Company-Food Group (Simplot).

2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY AND PERMITTING HISTORY

2.1 Application Scope

This permit is an administrative amendment of the facility's currently effective Tier I operating permit. The amendment is to change the name of the company's responsible official.

2.2 Application Chronology

September 11, 2009 DEQ received application for administrative amendment to change the name of the facility's responsible official.

2.3 Facility Permitting History

2.3.1 Tier I Operating Permit History – Previous 5-year permit term January 17, 2007 to March 8, 2012

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from January 17, 2007 to January 17, 2012. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

- April 25, 2007 T1-2007.0042, Administrative amendment. Permit status (A, will be S as a result of this project).
- March 8, 2007 T1-2007.0010, Administrative amendment. Permit status (S).
- January 17, 2007 T1-050013, Tier I operating permit renewal. Permit status (S).

2.3.2 Underlying Permit History – Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

- July 11, 2008 P-2008.0091. PTC modification to replace Boiler No. 10 with Boiler No. 1. Permit status (A)
- December 7, 2007 PTC No. P-2007.0222. This permit revises PTC No. P-060025, issued June 14, 2006. The revision is to allow for the replacement of an

existing 99.0 MMBtu/hr natural gas fired boiler with a new 99.0 MMBtu/hr natural gas fired boiler. Emissions authorized by the permit remain unchanged. The permitting action of PTC No. P-2007.0222 does not contravene any existing Tier I operating permit conditions. J.R. Simplot has chosen to incorporate permit conditions found in PTC No. P-2007.0222 into the Tier I permit at the time of the Tier I renewal in accordance with IDAPA 58.01.01.209.05.a. Permit status (S).

- October 23, 2007 X-2007.0191. PTC exemption for an economizer installation on Boiler No. 9 stack. Permit status (A).
- September 6, 2007 PTC No. P-2007.0073. PTC modification to change line 4 fryer from processing french fries to pre-formed potato product. Removal of line 4 dryer. Permit status (A).
- June 14, 2006 PTC No. P-060025. This permitting action was in a form of a letter which serves as permit issued to Simplot on June 14, 2006. The permit mandates the two Cleaver-Brooks boiler to operate using natural gas exclusively. Permit status (S)
- December 22, 2005 PTC No. P-050016. PTC revision to replace the wet scrubber at the line 1 fryer with a wet electrostatic precipitator. Permit status (S).
- June 21, 2004 T1-030015. This Tier I operating permit incorporates the terms and conditions of the 1999 consent order and the PTC No. 027-00009, issued December 31, 1997, PTC No. P-030013, issued October 17, 2003, and PTC No.P-030014, issued October 17, 2003. This Tier I operating permit replaces Tier I Operating Permit No. 027-00009, issued October 24, 2002. Permit status (S).
- October 17, 2003 PTC No. P-030014. This PTC is a revision to PTC No: 027-00009, dated December 10, 2001. Permit status (A).
- October 17, 2003 PTC No. P-030013. This PTC is for ethanol production plant. Permit status (A).
- October 4, 2002 Tier I operating permit No. 027-00009. Project No. 9505-0591. Initial Tier I operating permit. Permit status (S).
- December 10, 2001 PTC No. 027-00009. This PTC is for ADI-BVF anaerobic digester with biogas flare. Permit status (S).
- October 7, 1999 Consent order. This consent order got terminated on 11/14/2006
- December 31, 1997 PTC No. 027-00009. Modification to line 5 fryer. Permit status (S).
- December 17, 1997 PTC No.027-00009. This PTC is for anaerobic digester biogas flare. Permit status (S).
- May 1, 1990 PTC No. P-900110. PTC for a new feed mill. Permit status (S).

3. REGULATORY REVIEW

3.1 Administrative Amendment

This permit is for an administrative amendment in accordance with IDAPA 58.01.01.381 to change the name of the facility's responsible official. The amendment date was added to the front page of the permit. No other changes have been made to the permit.

It should also be noted that the expiration date for Tier I Operating Permit No. T1-2007.0042 issued on January 17, 2007, was corrected to expire on January 17, 2012.

4. PUBLIC COMMENT

Public notice is not required for this administrative amendment in accordance with IDAPA 58.01.01 381.c.

5. EPA REVIEW OF PROPOSED PERMIT

EPA review is not required for this administrative amendment in accordance with IDAPA 58.01.01.381.c. A copy of the revised permit is being submitted to EPA.

Appendix A – AIRS Information

AIRS/AFS Facility-wide Classification – Data Form

Facility Name: J.R. Simplot Company - Food Group, Caldwell Facility
Facility Location: Caldwell, ID
Facility ID: 027-00009 **Date:** 10/16/2009
Project/Permit No.: T1-2009.0119 **Completed By:** Harbi Elshafei

- Check if there are no changes to the facility-wide classification resulting from this action. (compare to form with last permit)
- Comments:
- Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

	SO2	PM10	VOC
Area Classification:	U	U	U

DO NOT LEAVE ANY BLANK

Check one of the following:

- SIP [0]** - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)
- OR
- Title V [V]** - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	B	A	A	A	A	B	C

- PSD [6]** - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- NSR - NAA [7]** - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- NESHAP [8]** - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

- NSPS [9]** - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- MACT [M]** - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?