



Air Quality Permitting Statement of Basis

February 28, 2007

Permit to Construct No. P-060063

**Darigold, Inc.
Caldwell, ID**

Facility ID No. 027-00054

Prepared by:

A handwritten signature in black ink, appearing to be "TD", written over the printed name.

**Tracy Drouin, Permit Writer
AIR QUALITY DIVISION**

FINAL

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Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
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
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
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
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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

Darigold Inc., (Darigold) produces nonfat dry milk powder and bulk cream from whole milk. The cream is separated from the whole milk, pasteurized, and shipped to other processors. The skim milk is pasteurized, condensed and dried. The facility has the capability to produce cheese. Whey powder can be produced from the liquid drawn off during the cheese manufacturing process.

3. FACILITY / AREA CLASSIFICATION

Darigold is classified as a minor facility because Darigold's potential to emit is less than major source thresholds without requiring limits on its potential to emit. The AIRS classification is "B."

The facility is located within AQCR 64 and UTM zone 11. The facility is located in Canyon County which is designated as unclassifiable for all regulated criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone).

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

4. APPLICATION SCOPE

This PTC changes the facility's name from WestFarm Foods to Darigold, Inc. No emissions changes have occurred as a result of this PTC revision.

4.1 *Application Chronology*

December 11, 2006 DEQ received the PTC application.

January 3, 2007 DEQ determined the application complete.

5. PERMIT ANALYSIS

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

5.1 *Equipment Listing*

No new equipment has been added as a result of this PTC.

Existing Equipment Listing

Emissions Unit: NIRO Dryer
Control Equipment: "F-dryer" baghouse
Stack Exit Height (ft): 55
Stack Exit Diameter (ft): 2.16
Stack Exit Flow Rate (acfm): 24,350
Stack Exit Temperature (°F): 165

Emissions Unit: L-Dryer
Control Equipment: CE Rogers baghouse
Stack Exit Height (ft): 50
Stack Exit Diameter (ft): 3.12
Stack Exit Flow Rate (acfm): 36,950
Stack Exit Temperature (°F): 167

Emissions Unit: Anhydro Dryer
Control Equipment: NIRO baghouse
Stack Exit Height (ft): 89
Stack Exit Diameter (ft): 4.13
Stack Exit Flow Rate (acfm): 63,000
Stack Exit Temperature (°F): 180

Emissions Unit: Kewanee Model F Boiler #1
Control Equipment: none
Stack Exit Height (ft): 50
Stack Exit Diameter (ft): 2.5
Stack Exit Flow Rate (acfm): 4,030
Stack Exit Temperature (°F): 205

Emissions Unit: Kewanee Model F Boiler #2
Control Equipment: none
Stack Exit Height (ft): 62
Stack Exit Diameter (ft): 2.5
Stack Exit Flow Rate (acfm): 4,030
Stack Exit Temperature (°F): 200

Emissions Unit: Bin Vents (4)
Control Equipment: General Resource Corp. baghouse
Stack Exit Height (ft): 30
Stack Exit Diameter (ft): 0.5
Stack Exit Flow Rate (acfm): 1,015
Stack Exit Temperature (°F): 113

Emissions Unit: Bagging Receiver Vent
Control Equipment: Flex-Kleen baghouse
Stack Exit Height (ft): 40
Stack Exit Diameter (ft): 1
Stack Exit Flow Rate (acfm): 3,500
Stack Exit Temperature (°F): 100

5.2 Emissions Inventory

Emission inventory was not provided in the application because there is no emissions increase due to this permit action.

5.3 Modeling

Modeling is not required for this permit action because there is no emissions increase due to this permit action.

5.4 Regulatory Review

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

IDAPA 58.01.01.209.04..... Procedure For Issuing Permits—Revisions of Permits to Construct

This project involves changing the name that the facility does business as due to a change in ownership. It is being processed as a permit revision. None of the permit conditions change, nor do the regulations which are applicable to the facility change.

IDAPA 58.01.01.224..... Permit to Construct Application Fee

A PTC application fee is not required for name changes per IDAPA 58.01.01.224.03.

5.5 Permit Conditions Review

Changes to this PTC are the facility name change and formatting. Any records retained must be kept for five years instead of the former two years (this is the result from updating the General Provisions). All other permit conditions remain unchanged.

6. PERMIT FEES

This PTC is a facility name change. Permit fees are not required for this project per IDAPA 58.01.01.225.

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

This PTC is an administrative amendment for a facility name change. Therefore, the regional office did not request to review a draft permit.

7.2 Facility Review of Draft Permit

The facility did not request to review a draft permit.

7.3 *Public Comment*

A public comment period was not required for the revised PTC in accordance with IDAPA 58.01.01.209.04, because there was not an increase in emissions.

8. RECOMMENDATION

Based on the review of the application materials and all applicable state and federal regulations, staff recommends that DEQ issue final PTC No. P-060063 to Darigold for its Caldwell facility.

Appendix A

AIRS Information

P-060063

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

Facility Name: Darigold, Inc.
Facility Location: Caldwell
AIRS Number: 027-00054

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							U
NO _x	B							U
CO	B							U
PM ₁₀	B							U
PT (Particulate)	B							U
VOC	B							U
THAP (Total HAPs)	B							U
APPLICABLE SUBPART								

^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).