



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Tier I Operating Permit No. T1-2008.0077

Project No. 60533

Final

Nonpareil Corporation

Blackfoot, Idaho

Facility ID No. 011-00027

September 13, 2010


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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

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Acronyms, Units and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
gr	grain (1 lb = 7,000 grains)
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HAP	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
TAP	toxic air pollutant
Tier I	Tier I operating permit

T/yr tons per year
UTM Universal Transverse Mercator
VOC volatile organic compound

1. INTRODUCTION AND APPLICABILITY

Nonpareil is a potato processor, and is located at 40 N.400 W. Groveland, Blackfoot, Idaho. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit PM₁₀, SO₂, and NO_x above the major source threshold of 100 tons-per-year. The facility is not classified as a major facility, as defined by Subsection 008.10.a, because it does not have the potential to emit hazardous air pollutants above the major source thresholds of 10 tons-per-year for any single HAP and/or 25 tons-per-year for any combination of HAPs. Nonpareil is currently a permitted Tier I facility. This action is to administratively amend the Tier I permit to incorporate PTC 2010.0057.

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. This document provides the basis for the Tier I administrative amendment to the Tier I operating permit for Nonpareil. The vast majority of the facility remains unchanged. This statement of basis only details the administrative amendments made to the Tier I permit.

2. FACILITY INFORMATION

2.1 Facility Description

The facility description does not change from that presented in the October 10, 2008 Statement of Basis that supports the issuance of Tier I operating permit number T1-2008.0077 issued October 10, 2008.

2.2 Facility Permitting History

2.2.1 Tier I Operating Permit History – Current 5-year permit term October 10, 2008 to October 10, 2013

The following information is the Tier I permitting history of this facility during the current term of the permit. 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).

October 10, 2008 T1-2008.0077, Initial Tier I Permit, Permit status (Superseded by this permit)

2.2.2 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).

September 13, 2010 P-2010.0057 Modification to add a natural gas fired bin dryer and natural gas fired room heater (A)

June 13, 2008 P-2008.0057 was issued to modify and replace the existing permit to construct (P-050300). (S)

May 9, 2007 P-050300 was issued to modify and replace the existing Tier II operating permit with a facility-wide permit to construct to establish limits for the use of residual oil and the use of emulsifiers in the boilers and to establish emission rates and modify throughput limits for potato processing. The facility was also reclassified as a major source of PM₁₀, SO₂, and NO_x emissions. (S)

August 5, 2002 T2-9811-169-2 (011-00027) was issued as an initial Tier II operating permit. Synthetic minor limits were established to limit the facility's potential to emit below the major source thresholds. (S)

3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

3.1 Application Scope

The facility requested to administratively amend the Tier I operating permit to included Permit to Construct P-2010.0057, issued September 13, 2010.

3.2 Application Chronology

April 22, 2010	DEQ received an application.
May 21, 2010	DEQ determined that the application was complete
July 19, 2010	DEQ provided the facility a draft permit for review

4. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

Refer to the September 13, 2010 statement of basis for Permit to Construct P-2010.0057 for details regarding changes to emissions units and emissions inventories. In summary, the facility added a 2 MMBtu per hour natural gas fired bin dryer and a 3.3 MMBtu per hour natural gas fired room heater; emissions changes are insignificant.

4.1 Insignificant Emissions Units Based on Size or Production Rate

Insignificant activities do not change from those detailed in the October 10, 2010 Statement of Basis for the issuance of the initial Tier I permit.

5. EMISSIONS LIMITS AND MRRR

This statement of basis details only those permit conditions which have changed. Regulatory and technical details of the changes can be seen in the September 13, 2010 statement of basis for Permit to Construct P-2010.0057.

5.1 Facility-wide Conditions

The facility-wide permit conditions remain unchanged with the following exception. Facility-wide permit condition 2.20 was added. This permit condition simply specifies that wherever NSPS provisions are cited in the permit they are incorporated by reference, and should there be a conflict between the permit condition and the NSPS the NSPS shall govern, including any amendments to that regulation. This does not constitute a regulatory change; it simply clarifies the intent of the permit conditions that cite NSPS.

5.2 Emissions Unit-specific Changes

Table 1.1 (Regulated Sources) was amended to include the new natural gas fired bin dryer and the new natural gas fired room heater.

East and West Processing Boilers

Table 3.1 – the maximum fuel consumption information was removed from the general description included in the table for East and West Processing Boilers. The permit limits fuel usage in specific permit conditions and it is not necessary to list fuel consumption in the summary descriptions in Table 3.1.

Permit Condition 3.7 – This is a new permit condition that requires monitoring of hours of operation of the boilers. It was necessary to add this monitoring requirement because there was not an existing monitoring requirement associated with existing hours of operation limits in the permit.

Dryers

Table 4.1 was amended to specify that the Bin Dryer is now heated by a 2 MMBtu per hour natural gas fired energy source instead of by steam.

Summary of Emission Rate Limits

The footnotes of Table 6.1 and 6.2 were amended. The following two footnotes were removed from the permit:

- a) As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.
- b) As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

The following footnote was added to the tables:

- a) In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and record keeping requirements.

This change in footnotes simply serves to more accurately describe how the facility complies with emission rate limits and is consistent with DEQ's standard permit language for emission rate limits.

As described in the in the September 13, 2010 statement of basis for Permit to Construct P-2010.0057 all emission rate limits less than 0.99 pounds per hour were removed from the permit.

6. REGULATORY REVIEW

The regulatory applicability for the following does not change from that described in the October 10, 2008 Statement of Basis that supports the issuance of Tier I operating permit number T1-2008.0077 issued October 10, 2008.

- Attainment Designation (40 CFR 81.313)
- Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)
- PSD Classification (40 CFR 52.21)
- NSPS Applicability (40 CFR 60)
- MACT Applicability (40 CFR 63)
- CAM Applicability (40 CFR 64)

In summary, the addition of the 2 MMBtu/hr natural gas fired unit to the bin dryer and the addition of the 3.3 MMBtu per hour natural gas fired room heater does not change any of the regulations which apply to the facility.

7. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from August 9, 2010 to September 8, 2010. During this time, comments were not submitted in response to DEQ's proposed action

8. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, on August 4, 2010, DEQ provided the proposed permit to EPA Region 10 for its review and comment. On August 9, 2010, EPA Region 10 responded to DEQ via e-mail indicating that they do not object to the permits issuance.

Appendix A – AIRS Information

AIRS/AFS Facility-wide Classification - Data Form

Facility Name: Nonpareil
Facility Location: Blackfoot
Facility ID: 011-00027 **Date:** 9/13/10
2010.
Project/Permit No.: 2010.0057 **Completed By:** Dan Pitman

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 (unclassifiable) for the following pollutants:

	SO2	PM10	VOC	
Area Classification:	A	A	A	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:	A	A	B	A	A	B	B

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
<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
<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?

A, Dc

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
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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?

AIRS/AFS Facility-wide Classification Form Guidance

AIRS/AFS Classification Codes:

For THAPs (Total Hazardous Air Pollutants) only:

- A = Use when any one HAP is emitted ≥ 10 T/yr or if the aggregate of all HAPS (Total HAPS) is ≥ 25 T/yr.
- SM = Use when limitations keep the HAPs from being emitted at or above the 10 or 25 T/yr threshold.
- B = Use when the potential to emit without permit restrictions is below either the 10 or 25 T/yr threshold.

For all other pollutants:

- A = Actual or potential emissions of a pollutant are \geq the applicable major source threshold.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulation 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).

Area Classification Codes:

A = Attainment N = Nonattainment U = Unclassifiable

- Classification designations are listed in 40 CFR Part 81.
- Where the listed designation is "Unclassifiable/ Attainment" for a pollutant, insert "U."
- CO and PM₁₀ - Northern Ada County is "A" (within the boundaries of the former Northern Ada County CO and PM₁₀ nonattainment area)
- PM₁₀ - Power-Bannock Counties is "A" (the portion of the former Pocatello nonattainment area subject to state jurisdiction)dxdxxx

Maps: "Air Quality Planning Areas Including PM_{2.5}" in the TRIM Permit Writers' Toolbox (TRIM Record No. 2009ACF18)
<http://global.deq.idaho.gov/website/emissions/viewer.htm>

Yes, this facility is an SM80 source

Check this box if the facility is a synthetic minor, and the permit sets the emission limits at:

- 80 tons per year or more for SO₂, NO_x, CO, PM₁₀, PT, or VOC **and/or**
- 8 tons per year or more of a single HAP **and/or**
- 20 tons per year or more of THAP

If not, leave blank.

SIP - Yes, this facility is subject to SIP requirements

All Idaho permits are issued in accordance with the Idaho SIP. This box should be checked unless the facility is a TV source. The SIP box and the Title V box should never both be checked.

Identify the classification (A, SM, B, C, or ND as defined above) of those pollutants listed that apply to the facility.

TITLE V - Yes, this facility is subject to Title V requirements

Check the box if the facility is a TV source. The SIP box and the Title V box should never both be checked.

Identify the classification (A, SM, B, C, or ND as defined above) of those pollutants listed that apply to the facility.

PSD - Yes, this facility is subject to PSD requirements

Check the box if the facility has a PSD permit. Do not check if a facility takes permit limits to prevent triggering PSD. Also check the box for those pollutants listed if they apply to PSD.

NSR - NAA - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements

Check the box if the facility is required to comply with NSR nonattainment area requirements (IDAPA 58.01.01.204). Also check the box for those pollutants listed that apply to NSR - NAA.

NESHAP - Yes, this facility is subject to NESHAP (Part 61) requirements

Check the box if the facility is subject to comply with NESHAP requirements (40 CFR 61).

If the facility is subject to NESHAP, enter the CFR subpart(s).

NSPS - Yes, this facility is subject to NSPS (Part 60) requirements

Check the box if the facility is required to comply with NSPS requirements (40 CFR 60).

If the facility is subject to NSPS, enter the CFR subpart(s).

Also check the box for those pollutants listed that apply to NSPS.

MACT - Yes, this facility is subject to MACT (Part 63) requirements

Check the box if the facility is subject to comply with MACT requirements (40 CFR 63).

If the facility is subject to MACT, enter the CFR subpart(s).

How to Save AIRS Classification Form in TRIM

It is recommended that the AIRS Form be a separate document from the Statement of Basis (SOB). Save the form in TRIM as a "Word file" directly under the container level, not in the project folder, with a name similar to: Facility Name Project # AFS Classification Form.