



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Tier I Operating Permit No. T1-2011.0117

Project No. 60897

Final

J.R. Simplot Company, Food Group

Caldwell, Idaho

Facility ID No. 027-00009

February 13, 2012

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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
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CI	compression ignition
CO	carbon monoxide
COD	chemical oxygen demand
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
ESP	electrostatic precipitator
gpm	gallons per minute
HAP	hazardous air pollutants
hp	horsepower
IC	internal combustion
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
RICE	reciprocating internal combustion engine
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
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
WESP	wet electrostatic precipitator

1. INTRODUCTION AND APPLICABILITY

J.R. Simplot Company, Food Group is a manufacturer of par fried french fries, par fried preformed potato products, and other processed potato products, and is located approximately two miles west of the City of Caldwell on Highway 19. 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 and CO above the major source threshold of 100 tons-per-year. At the time of this permitting action, the facility is not a major source of HAP emissions. As a major facility, J.R. Simplot Company is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from J.R. Simplot Company as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

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 draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for J.R. Simplot Company.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

J.R. Simplot Company's Tier I operating permit is organized into sections. They are as follows:

Section 1 – Tier I Operating Permit Scope

The scope describes this permitting action.

Section 2 – Facility-Wide Conditions

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

Sections 3 through 7 – Production Lines No. 1, 5, and 6, Steam Generating Plant, Heater S-C-H5, Biogas Unit, and Four Emergency IC Engines

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

Section 8 – Non-applicable Requirements and Insignificant Activities

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

Section 9 – General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

2. FACILITY INFORMATION

2.1 Facility Description

J.R. Simplot Company, Food Group, Caldwell facility (Simplot) produces par fried french fries and par fried preformed potato products using three processing lines.

2.2 Facility Permitting History

2.2.1 Tier I Operating Permit History – Previous 5-year permit term January 17, 2007 to January 17, 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).

January 17, 2007	T1-050013, Renewal of Tier I permit, Permit Status (S)
March 8, 2007	T1-2007.0010, Administrative amendment, Permit Status (S)
April 25, 2007	T1-2007.0042, Administrative amendment, Permit Status (S)
October 26, 2009	T1-2009.0119, Administrative amendment, Permit Status (S)
February 4, 2011	T1-2009.0119, Administrative amendment, Permit Status (A, until T1-2011.0117 is issued, then superseded.)

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).

May 1, 1990	PTC No. P-900110, PTC for a new feed mill, Permit Status (S)
December 17, 1997	PTC No. 027-00009, PTC for anaerobic digester biogas flare, Permit Status (S)
December 31, 1997	PTC No. 027-00009, PTC modification to line 5 fryer, Permit Status (S)
December 10, 2001	PTC No. 027-00009, PTC for ADI-BVF anaerobic digester with biogas flare, Permit Status (S)
October 4, 2002	Tier I Operating Permit No. 027-00009, Initial Tier I operating permit, Permit Status (S)
October 17, 2003	PTC No. P-030013, PTC for an ethanol production plant, Permit Status (A)
October 17, 2003	PTC No. P-030014, PTC revision for PTC No. 027-00009, Permit Status (S)
June 21, 2004	T1-030015, Tier I operating permit incorporating PTC No. 027-00009, PTC No. P-030013, PTC No. P-030014, and a consent order issued in 1999, Permit Status (S)
December 22, 2005	PTC No. P-050016, PTC revision to replace the wet scrubber at the Line 1 fryer with wet ESP, Permit Status (A)
June 14, 2006	PTC No. P-060025, Mandates the two Cleaver-Brooks boilers to operate using natural gas exclusively, Permit Status (S)
September 6, 2007	PTC No. P-2007.0073, PTC modification to change Line 4 fryer from processing French fries to pre-formed potato product and removal of Line 4 dryer, Permit Status (A)
December 7, 2007	PTC No. P-2007.0222, PTC revision of PTC No. P-060025 for the replacement of an existing natural gas fired boiler, Permit Status (S)
July 11, 2008	PTC No. P-2008.0091, PTC modification to replace Boiler No. 10 with Boiler No. 1, Permit Status (S)

January 29, 2010

PTC No. P-2009.0136, PTC revision to operate an additional burner in Boiler No. 1 and remove temporary Boiler No. 11, Permit Status (A)

3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

3.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit. In addition, PTC No. P-2009.0136 permit conditions have been incorporated as well as 40 CFR 63 Subpart ZZZZ and 40 CFR 60 Subpart JJJJ for the four emergency IC engines.

3.2 Application Chronology

- July 12, 2011 DEQ received an application from J.R. Simplot Company to renew the facility's effective Tier I operating permit.
- September 6, 2011 DEQ determined the application complete
- December 16, 2011 DEQ provided the draft permit to the facility for review
- January 3, 2012 DEQ provided the Tier I operating permit for public comment and affected states review. Public comment and affected states review ended on February 2, 2012.
- February 6, 2012 DEQ provided the proposed permit to EPA Region 10 for review.
- February 13, 2012 DEQ issued the final permit to the facility

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

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

4.1 Process No. 1 – Production Lines No. 1, 5, and 6

Table 4.1 lists the emissions units and control devices associated with Production Lines No. 1, 5, and 6.

Table 4.1 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)
S-C-F1	Production Line No. 1 Gem Equipment Fryer, installed in 1998	Wet ESP
S-C-F5	Production Line No. 5 J.R. Simplot Company Fryer, installed in 1970/1971	Wet ESP
S-C-F6	Production Line No. 6 J.R. Simplot Company Fryer, installed in 1970/1971	Wet ESP

The facility has three processing lines. Lines 1 and 5 produce preformed potato products, while Line 6 produces french fries. Lines 1 and 6 have a blancher, a dryer, and a fryer. Line 5 has a blancher and a fryer. The exhaust from all three fryers is routed through the wet electrostatic precipitator (WESP). Production Line No. 5 has been renamed at the facility's request. Production Line No. 5 was known as Production Line No. 4 in previously issued permits.

4.2 Process No. 2 – Steam Generating Plant

Table 4.2 lists the emissions units and control devices associated with the Steam Generating Plant.

Table 4.2 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)
S-C-B8	Boiler No. 8, Industrial Steam, installed in 1966, capacity of 80.8 MMBtu/hr	None
S-C-B1	Boiler No. 1, English Boiler & Tube Boiler, installed in 2010, capacity of 98.25 MMBtu/hr	Flue Gas Recirculation (FGR)

Boiler No. 1 is a natural gas and biogas fired boiler that provides process steam to heat potato steam peelers, blanchers, and fryer. Boiler No. 8 is a natural gas boiler that also provides process steam to the potato processing plant and the ethanol plant. Boilers 9 and 10 were removed from service and as such have been removed from the Tier I operating permit.

4.3 Process No. 3 – Heater S-C-H5

Table 4.3 lists the emissions units and control devices associated with Heater S-C-H5.

Table 4.3 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)
S-C-H5	Heating Unit, Hartzell model 185A03, 10236, installed in 1991, capacity of 10.125 MMBtu/hr	None

Heater S-C-H5 is a natural gas-fired heating unit that is used to heat the plant. Emissions from the heaters are released to the atmosphere through room vents.

4.4 Process No. 4 – Biogas Unit

Table 4.4 lists the emissions units and control devices associated with the biogas unit.

Table 4.4 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)
ADI-BVF	Anaerobic digester	Flare (S-C-BF)

The wastewater treatment plant employs an anaerobic digester to treat the starch-laden water from the main production facility. The anaerobic digestion process generates biogas that contains a number of gaseous byproducts including methane, carbon dioxide, and hydrogen sulfide. The digester biogas is combusted in either the biogas flare or Boiler No. 1, or simultaneously in both units.

4.5 Process No. 5 – Emergency IC Engines

Table 4.5 lists the emissions units and control devices associated with the emergency IC engines.

Table 4.5 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)
Unit 1	166 hp diesel CI engine installed prior to June 12, 2006	None
Unit 2	287 hp diesel CI engine installed prior to June 12, 2006	None
Unit 3	14.8 hp natural gas SI engine installed after June 12, 2006	None
Unit 4	55 hp natural gas SI engine installed prior to June 12, 2006	None

The four IC engines are for emergency purposes only. The three IC engines installed before June 12, 2006 are subject to 40 CFR 63, Subpart ZZZZ. The one IC engine that was installed after June 12, 2006 and was manufactured on or after July 1, 2008 is subject to 40 CFR 60, Subpart JJJJ.

4.6 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 4.2 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

Table 4.6 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit/Activity	Regulatory Authority/Justification
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 HAPs, 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 5 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	IDAPA 58.01.01.317.01(b)(i)(9)
Ink used to print on packaging using less than 2 gallons per 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 gallons per minute	IDAPA 58.01.01.317.01(b)(i)(13)
Water chlorination less than 20,000,000 gallons per day of water	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)
Tanks, vessels, and pumping equipment with appropriate closure for storage or dispensing of aqueous solutions of inorganic salts, bases and acids	IDAPA 58.01.01.317.01(b)(i)(19)
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, and S-C-H12	IDAPA 58.01.01.317.01(b)(i)(30)

Non-applicable Requirements for Which a Permit Shield is Requested

This section of the permit lists the regulations for which the facility has requested, and DEQ proposes to grant, a permit shield pursuant to IDAPA 58.01.01.325. The facility has not requested a permit shield.

4.7 Emissions Inventory

Table 4.7 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix B of this statement of basis.

Table 4.7 EMISSIONS INVENTORY – POTENTIAL TO EMIT (T/yr)

Emissions Unit Description	PM ₁₀	NO _x	SO ₂	CO	VOC	HAP	Greenhouse Gas
Boiler No. 1 – natural gas	3.2	21.1	0.3	35.4	2.3	0.8	
Boiler No. 1 – biogas and natural gas	3.2 ^a	21.1 ^a	90.2	35.4 ^a	2.3 ^a	0.8	
Biogas Flare	0.2	2.3		12.3	4.6	0	
Boiler No. 8	2.6	34.7	0.2	29.1	1.9	0.65	
Dryer 1	26.3	2.0	0.01	1.7	0.1	0.04	
Dryer 6	45.6	5.2	0.06	8.7	0.6	0.2	
WESP	47.7	0	0	0	12.7	0	
Air MakeUp Units	1.8	24.2	0.1	20.3	1.3	0.45	
Solvent and Adhesive Use	0	0	0	0	2.8	0	
TOTAL EMISSIONS	127.4	89.4	90.6	107.5	26.3	2.1	63,718

^a When adding the total emissions, emissions from Boiler No. 1 were not double-counted. The higher of the natural gas or natural gas and biogas was used in the total.

5. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Production Lines No. 1, 5, and 6 Emissions Limits;
- Steam Generating Plant Emissions Limits;
- Heater S-C-H5 Emissions Limits;
- Biogas Unit Emissions Limits; and
- Emergency IC Engines Emissions Limits; and
- Tier I Operating Permit General Provisions.

MRRR

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, describe why and how the condition was changed. See instructions on the cover page for Appendix D for other options.

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the MRRR for the facility-wide permit conditions has been paraphrased. Refer to the permit for the complete requirement.

5.1 Facility-wide Conditions

Permit Condition 2.1 – Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/07]

MRRR (Permit Conditions 2.2 through 2.4)

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct a quarterly facility-wide inspection of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.
- Records of each fugitive dust inspection and corrective action taken are to be maintained at the permitted facility.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

Permit Condition 2.5 – Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

MRRR (Permit Condition 2.6)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State-only), 5/1/94]

Permit Condition 2.7 – Visible Emissions

The permittee shall not 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% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

MRRR (Permit Condition 2.8)

- Conduct a quarterly facility-wide inspection during daylight hours and under normal operating conditions for the purposes of observing points of visible emissions from all emissions units subject to the visible emissions standards.
- Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition.

- Each inspection shall be conducted as follows:
 - Initial 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 either:
 - Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions, and conduct another see/no see evaluation within 24 hours. If the visible emissions are not eliminated, the permittee shall comply with b).

OR

- Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. If the measured opacity is greater than 20% for the time period specified in Section 625, the permittee shall take corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.
- Records of each visible emission inspection and each opacity test and corrective action taken are to be maintained at the permitted facility.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Permit Condition 2.9 – Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.

MRRR

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

Permit Condition 2.10 – Performance Testing

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

The permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
Phone: (208) 373-0550 Fax: (208) 373-0287

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, J.R. Simplot Company must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

However, if performance testing is required, it is to be conducted in accordance with IDAPA 58.01.01.157, including any and all monitoring, recordkeeping and reporting requirements. Emissions-unit specific MRRR will be listed within the permit condition requiring performance testing permit condition.

Permit Condition 2.11 – Monitoring and Recordkeeping

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, J.R. Simplot Company must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.12 – Reports and Certifications

All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
Phone: (208) 373-0550 Fax: (208) 373-0287

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, J.R. Simplot Company must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.13 – Fuel Burning Equipment PM Standards

The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, J.R. Simplot Company must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.14 – Distillate Fuel Oil Sulfur Content Limits

The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

Permit Condition 2.14.1 – Coal Sulfur Content Limit

The permittee shall not sell, distribute, use, or make available for use, any coal containing greater than 1% sulfur by weight.

[IDAPA 58.01.01.729, 5/1/94]

MRRR – (Permit Condition 2.14.2)

The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as-received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

Permit Condition 2.15 – Open Burning

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 5/08/09]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, J.R. Simplot Company must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.16 – Renovation/Demolition

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, J.R. Simplot Company must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.17 – Regulated Substances for Accidental Release Prevention

(a)

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

(b)

This facility is subject to 40 CFR Part 68 and shall certify compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by 40 CFR 70.6(c)(5).

[40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 68.215(a)(ii)]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, J.R. Simplot Company must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.18 – Recycling and Emissions Reductions

The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, J.R. Simplot Company must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

5.2 Emissions Unit-specific Emissions Limits and MRRR

This section only describes the permit conditions that have been added or changed since the last permit renewal.

Production Lines No. 1, 5, and 6

Production Line No. 4 in the previous permit has been changed to reference Line No. 5 at the facility's request. The dryer in Line No. 5 has been removed. No other permit conditions have been added or changed for Production Lines No. 1, 5, and 6.

Steam Generating Plant

Cleaver-Brooks boiler (Unit No. S-C-B9) and Cleaver-Brooks boiler (Unit No. S-C-B10) have both been shut down and as such have been removed from the permit. PTC P-2009.0136 permit conditions have been incorporated into this Tier I Operating Permit.

Permit Condition 4.2, Fuel Requirements

Only natural gas shall be fired in Boiler No. 8.

MRRR – (Permit Condition 4.5 through 4.6)

Boiler No. 8 is required to combust only natural gas.

Permit Condition 4.3, Fuel Requirements

Natural gas or a mixture of natural gas and biogas shall be fired in Boiler No. 1.

MRRR – (Permit Condition 4.5 through 4.6)

Boiler No. 1 is required to combust only natural gas or a mixture of natural gas and biogas and to monitor and maintain records of such.

Permit Condition 4.4, Operating Requirements

A flue gas recirculation system shall be equipped on Boiler No. 1 and shall be operational at all times.

MRRR – (Permit Condition 4.5 through 4.6)

The facility is required to operate Boiler No. 1 according to the operating requirements. The facility is required to report each instance where the requirements are not met.

Heater S-C-H5

No permit conditions have been added or changed for Heater S-C-H5

Biogas Unit

PTC P-2009.0136 permit conditions have been incorporated into this Tier I Operating Permit. The chemical oxygen demand (COD) permit conditions have been revised to expire upon initiation of the biogas to the flare and Boiler No. 1.

Permit Condition 6.1, Operating Limitations

Total SO₂ emissions from the combustion of biogas from the flare and Boiler No. 1 shall not exceed 90 tons per any consecutive 12-month period.

MRRR – (Permit Condition 6.7 through 6.12)

The facility is required to operate the biogas unit according to the permit limits. The facility is required to report each instance where the requirements are not met.

Permit Condition 6.2, Operating Limitations

The H₂S concentration in the biogas shall not exceed a maximum of 5391 parts per million by volume (ppmv).

MRRR – (Permit Condition 6.7 through 6.12)

The facility is required to operate the biogas unit according to the permit limits. The facility is required to report each instance where the requirements are not met.

Permit Condition 6.5, Operating Requirements

The ADI-BVF anaerobic digester flare shall be operated with a pilot flame present at all times during the operation of the digester.

MRRR – (Permit Condition 6.7 through 6.12)

The facility is required to operate the biogas unit according to the operating requirements. The facility is required to report each instance where the requirements are not met.

Emergency IC Engines

The four emergency IC engines are subject to 40 CFR 60 Subpart JJJJ or 40 CFR 63 Subpart ZZZZ. Permit conditions have been written to incorporate the applicable provisions.

Permit Condition 7.3, Operating Limitations

Change the oil and filter every 500 hours of operation or annually, whichever comes first, inspect the air cleaner every 1,000 hours of operation or annually whichever comes first, and inspect the hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary in Units 1 and 2 on or after May 3, 2013.

MRRR – (Permit Conditions 7.9 through 7.21)

The facility is required to operate and maintain Units 1 and 2 according to the operating limitations. The facility is required to report each instance where the requirements are not met.

Permit Condition 7.4, Operating Limitations

Change the oil and filter every 500 hours of operation or annually, whichever comes first, inspect spark plugs every 1,000 hours of operation or annually whichever comes first, and inspect the hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary in Unit 4 on or after October 19, 2013.

MRRR – (Permit Conditions 7.9 through 7.21)

The facility is required to operate and maintain Unit 4 according to the operating limitations. The facility is required to report each instance where the requirements are not met.

Permit Condition 7.5, Operating Limitations

Certify Unit 3 to certification emissions standards and other requirements in 40 CFR part 90 or 1054.

MRRR – (Permit Conditions 7.9 through 7.21)

The facility is required to operate and maintain Unit 3 according to the operating limitations. The facility is required to report each instance where the requirements are not met.

Permit Condition 7.6, General Requirements

Maintain Units 1, 2, and 4 in a manner consistent with safety and good air pollution control practices for minimizing emissions.

MRRR – (Permit Conditions 7.9 through 7.21)

The facility is required to operate and maintain Units 1, 2, and 4 according to the general requirements. The facility is required to report each instance where the requirements are not met.

Permit Condition 7.8, Performance Tests

A performance test must include three separate runs within 10 percent of 100 percent peak load and last at least 1 hour under specific conditions, and not during periods of startup, shutdown, or malfunction.

MRRR – (Permit Conditions 7.9 through 7.21)

The facility is required to conduct initial performance tests on Unit 3. The facility is required to report each instance where the requirements are not met.

5.3 General Provisions

Unless expressly stated, there are no MRRR for the general provisions.

General Provision 1 – General Compliance, Duty to Comply

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

General Provision 2 – General Compliance, Need to Halt or Reduce Activity Not a Defense

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

General Provision 3 – General Compliance, Duty to Supplement or Correct Application

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

General Provision 4 – Reopening, Additional Requirements, Material Mistakes, Etc.

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99;
40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

General Provision 5 – Reopening, Permitting Actions

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If J.R. Simplot Company files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

General Provision 6 – Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

General Provision 7 – Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00;
40 CFR 70.6(a)(6)(v)]

General Provision 8 – Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

General Provision 9 - Severability

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

General Provision 10 – Changes Requiring Permit Revision or Notice

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

General Provision 11 – Changes Requiring Permit Revision or Notice.

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

General Provisions 12 and 13 – Federal and State Enforceability

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98; Idaho Code §39-108; 40 CFR 70.6(b)(1) and (2)]

General Provision 14 – Inspection and Entry

Upon presentation of credentials, J.R. Simplot Company shall allow DEQ or an authorized representative of DEQ to do the following:

- a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

General Provision 15 – New Requirements During Permit Term

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94;
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

General Provision 16 - Fees

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

General Provision 17 – Certification

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

General Provision 18 – Renewal

a. J.R. Simplot Company shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

General Provision 19 – Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.

- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- c. Nothing in this permit shall alter or affect the following:
 - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

**[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;
IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]**

General Provision 20 – Compliance Schedule and Progress Reports.

- a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

**[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00;
40 CFR 70.6(c)(3) and (4)]**

General Provision 21 – Periodic Compliance Certification

J.R. Simplot Company shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:

- a. The compliance certifications for all emissions units shall be submitted annually from March 1 to February 28 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit.
- b. The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):

- i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
 - iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii. above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
 - iv. Such information as the Department may require to determine the compliance status of the emissions unit.
- d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

General Provision 22 – False Statements

J.R. Simplot Company may not make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

General Provision 23 – No Tampering

J.R. Simplot Company may not render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

General Provision 24 – Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, J.R. Simplot Company shall submit reports of any required monitoring at least every six months. J.R. Simplot Company's semiannual reporting periods shall be from March 1 to September 1 and September 2 to February 28. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

General Provision 25 – Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit

specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

General Provision 26 – Permit Revision Not Required, Emissions Trading

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

General Provision 27 - Emergency

In accordance with IDAPA 58.01.01.332, an “emergency” as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

6. REGULATORY REVIEW

6.1 Attainment Designation (40 CFR 81.313)

The facility is located in Canyon which is designated as attainment or unclassifiable for PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone. Reference 40 CFR 81.313.

6.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

The facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for PM₁₀ and CO as demonstrated previously in the Emissions Inventory Section of this analysis. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10, and is subject to Tier I permitting requirements.

6.3 PSD Classification (40 CFR 52.21)

The facility is not a major facility for the purposes of the federal prevention of significant deterioration (PSD) program as referenced by IDAPA 58.01.01.205 because the facility does not emit or has the potential to emit a regulated criteria air pollutant in amounts greater than or equal to the major threshold criteria of 250 T/yr. This permitting action did not include a 75,000 tpy CO_{2e} change.

6.4 NSPS Applicability (40 CFR 60)

Boiler No. 1 is subject to 40 CFR 60, Subpart Dc because it has a rated input capacity less than 100 MMBtu/hr and greater than 10 MMBtu/hr and was manufactured after June 9, 1989. Refer to PTC No. P-2009.0136, issued January 26, 2010 for the NSPS applicability break down for Boiler No. 1. Boiler No. 8 is not subject to 40 CFR 60, Subpart Dc because it was installed prior to June 9, 1989 and has not been modified.

The facility operates four emergency IC engines, one of which is subject to 40 CFR 60, Subpart JJJJ. Unit 3 is a 14.8 hp natural gas SI engine installed after June 12, 2006. Below is a breakdown of Subpart JJJJ.

40 CFR 60 Subpart JJJJ.....Standards of Performance for Stationary Spark Internal Combustion Engines

§ 60.4230 *Am I subject to this subpart?*

(a) *The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (6) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.*

(4) *Owners and operators of stationary SI ICE that commence construction after June 12, 2006, where the stationary SI ICE are manufactured:*

(iii) *on or after July 1, 2008, for engines with a maximum engine power less than 500 HP;*

The facility operates a stationary SI ICE that was manufactured after July 1, 2008 and is less than 500 hp.

§ 60.4233 *What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?*

(a) *Owners and operators of stationary SI ICE with a maximum engine power less than or equal to 19 KW (25 HP) manufactured on or after July 1, 2008, must comply with the emission standards in §60.4231(a) for their stationary SI ICE.*

The facility must comply with the emission standards in §60.4231(a) for Unit 3 as follows:

§ 60.4231 *What emission standards must I meet if I am an manufacturer of a stationary SI internal combustion engines or equipment containing such engines?*

(a) *Stationary SI internal combustion engine manufacturers must certify their stationary SI ICE with a maximum engine power less than or equal to 19 KW (25 HP) manufactured on or after July 1, 2008 to the certification emission standards and other requirements for new nonroad SI engines in 40 CFR part 90 or 1054, as follows:*

<i>If engine displacement is * * *</i>	<i>and manufacturing dates are * * *</i>	<i>the engine must meet emission standards and related requirements for nonhandheld engines under * * *</i>
<i>(1) below 225 cc</i>	<i>July 1, 2008 to December 31, 2011</i>	<i>40 CFR part 90.</i>
<i>(2) below 225 cc</i>	<i>January 1, 2012 or later</i>	<i>40 CFR part 1054.</i>
<i>(3) at or above 225 cc</i>	<i>July 1, 2008 to December 31, 2010</i>	<i>40 CFR part 90.</i>
<i>(4) at or above 225 cc</i>	<i>January 1, 2011 or later</i>	<i>40 CFR part 1054.</i>

§ 60.4234

How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine?

Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in §60.4233 over the entire life of the engine.

The facility must achieve the emissions standards required for the entire life of Unit 3.

§ 60.4237

What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?

(c) If you are an owner or operator of an emergency stationary SI internal combustion engine that is less than 130 HP, was built on or after July 1, 2008, and does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter upon startup of your emergency engine.

A non-resettable hour meter shall be installed on Unit 3.

§ 60.4243

What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?

(a) If you are an owner or operator of a stationary SI internal combustion engine that is manufactured after July 1, 2008, and must comply with the emission standards specified in §60.4233(a) through (c), you must comply by purchasing an engine certified to the emission standards in §60.4231(a) through (c), as applicable, for the same engine class and maximum engine power. In addition, you must meet one of the requirements specified in (a)(1) and (2) of this section.

(1) If you operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, you must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required if you are an owner or operator. You must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply to you. If you adjust engine settings according to and consistent with the manufacturer's instructions, your stationary SI internal combustion engine will not be considered out of compliance.

(2) If you do not operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, your engine will be considered a non-certified engine, and you must demonstrate compliance according to (a)(2)(i) through (iii) of this section, as appropriate.

(i) If you are an owner or operator of a stationary SI internal combustion engine less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions, but no performance testing is required if you are an owner or operator.

The facility must demonstrate compliance on the IC engine by meeting the requirements of either paragraph 1 or 2 above.

(d) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing.

but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited.

The above requirements pertain specifically to the IC emergency engine at the facility.

§ 60.4244 *What test methods and other procedures must I use if I am an owner or operator of a stationary SI internal combustion engine?*

Owners and operators of stationary SI ICE who conduct performance tests must follow the procedures in paragraphs (a) through (f) of this section.

(a) Each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and according to the requirements in §60.8 and under the specific conditions that are specified by Table 2 to this subpart.

Table 2 REQUIREMENTS FOR PERFORMANCE TESTS

<i>For each</i>	<i>Complying with the requirement to</i>	<i>You must</i>	<i>Using</i>	<i>According to the following requirements</i>
<i>1. Stationary SI internal combustion engine demonstrating compliance according to §60.4244.</i>	<i>a. limit the concentration of NO_x in the stationary SI internal combustion engine exhaust.</i>	<i>i. Select the sampling port location and the number of traverse points;</i>	<i>(1) Method 1 or 1A of 40 CFR part 60, appendix A or ASTM Method D6522–00(2005)a.</i>	<i>(a) If using a control device, the sampling site must be located at the outlet of the control device.</i>
	<i>ii. Determine the O₂ concentration of the stationary internal combustion engine exhaust at the sampling port location;</i>	<i>(2) Method 3, 3A, or 3B^b of 40 CFR part 60, appendix A or ASTM Method D6522–00(2005)^a.</i>	<i>(b) Measurements to determine O₂ concentration must be made at the same time as the measurements for NO_x concentration.</i>	
	<i>iii. Determine the exhaust flowrate of the stationary internal combustion engine exhaust;</i>	<i>(3) Method 2 or 19 of 40 CFR part 60.</i>		
	<i>iv. If necessary, measure moisture content of the stationary internal combustion engine exhaust at the sampling port location; and</i>	<i>(4) Method 4 of 40 CFR part 60, appendix A, Method 320 of 40 CFR part 63, appendix A, or ASTM D6348–03 (incorporated by reference, see §60.17).</i>	<i>(c) Measurements to determine moisture must be made at the same time as the measurement for NO_x concentration.</i>	

	v. Measure NO _x at the exhaust of the stationary internal combustion engine.	(5) Method 7E of 40 CFR part 60, appendix A, Method D6522–00(2005) ^a , Method 320 of 40 CFR part 63, appendix A, or ASTM D6348–03 (incorporated by reference, see §60.17).	(d) Results of this test consist of the average of the three 1-hour or longer runs.	
	b. limit the concentration of CO in the stationary SI internal combustion engine exhaust.	i. Select the sampling port location and the number of traverse points;	(1) Method 1 or 1A of 40 CFR part 60, appendix A.	(a) If using a control device, the sampling site must be located at the outlet of the control device.
	ii. Determine the O ₂ concentration of the stationary internal combustion engine exhaust at the sampling port location;	(2) Method 3, 3A, or 3Bb of 40 CFR part 60, appendix A or ASTM Method D6522–00(2005) ^a .	(b) Measurements to determine O ₂ concentration must be made at the same time as the measurements for CO concentration.	
	iii. Determine the exhaust flowrate of the stationary internal combustion engine exhaust;	(3) Method 2 or 19 of 40 CFR part 60.		
	iv. If necessary, measure moisture content of the stationary internal combustion engine exhaust at the sampling port location; and	(4) Method 4 of 40 CFR part 60, appendix A, Method 320 of 40 CFR part 63, appendix A, or ASTM D6348–03 (incorporated by reference, see §60.17).	(c) Measurements to determine moisture must be made at the same time as the measurement for CO concentration.	
	v. Measure CO at the exhaust of the stationary internal combustion engine.	(5) Method 10 of 40 CFR part 60, appendix A, ASTM Method D6522–00(2005) ^a , Method 320 of 40 CFR part 63, appendix A, or ASTM D 6348–03 (incorporated by reference, see §60.17).	(d) Results of this test consist of the average of the three 1-hour or longer runs.	
	c. limit the concentration of VOC in the stationary SI internal combustion engine exhaust.	i. Select the sampling port location and the number of traverse points;	(1) Method 1 or 1A of 40 CFR part 60, appendix A.	(a) If using a control device, the sampling site must be located at the outlet of the control device.
	ii. Determine the O ₂ concentration of the stationary internal combustion engine exhaust at the sampling port location;	(2) Method 3, 3A, or 3B ^b of 40 CFR part 60, appendix A or ASTM Method D6522–00(2005) ^a .	(b) Measurements to determine O ₂ concentration must be made at the same time as the measurements for VOC concentration.	
	iii. Determine the exhaust flowrate of the stationary internal combustion engine exhaust;	(3) Method 2 or 19 of 40 CFR part 60.		
	iv. If necessary, measure moisture content of the stationary internal combustion engine exhaust at the sampling port location; and	(4) Method 4 of 40 CFR part 60, appendix A, Method 320 of 40 CFR part 63, appendix A, or ASTM D6348–03 (incorporated by reference, see §60.17).	(c) Measurements to determine moisture must be made at the same time as the measurement for VOC concentration.	

	v. Measure VOC at the exhaust of the stationary internal combustion engine.	(5) Methods 25A and 18 of 40 CFR part 60, appendix A, Method 25A with the use of a methane cutter as described in 40 CFR 1065.265, Method 18 or 40 CFR part 60, appendix A, ^{cd} Method 320 of 40 CFR part 63, appendix A, or ASTM D6348-03 (incorporated by reference, see §60.17).	(d) Results of this test consist of the average of the three 1-hour or longer runs.	
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^aASTM D6522-00 is incorporated by reference; see 40 CFR 60.17. Also, you may petition the Administrator for approval to use alternative methods for portable analyzer.

^bYou may use ASME PTC 19.10-1981, Flue and Exhaust Gas Analyses, for measuring the O₂ content of the exhaust gas as an alternative to EPA Method 3B.

^cYou may use EPA Method 18 of 40 CFR part 60, appendix A, provided that you conduct an adequate presurvey test prior to the emissions test, such as the one described in OTM 11 on EPA's Web site (<http://www.epa.gov/itm/emc/prelim/otm11.pdf>).

^dYou may use ASTM D6420-99 (2004), Test Method for Determination of Gaseous Organic Compounds by Direct Interface Gas Chromatography/Mass Spectrometry as an alternative to EPA Method 18 for measuring total nonmethane organic.

(b) You may not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in §60.8(c). If your stationary SI internal combustion engine is non-operational, you do not need to startup the engine solely to conduct a performance test; however, you must conduct the performance test immediately upon startup of the engine.

(c) You must conduct three separate test runs for each performance test required in this section, as specified in §60.8(f). Each test run must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and last at least 1 hour.

(d) To determine compliance with the NO_x mass per unit output emission limitation, convert the concentration of NO_x in the engine exhaust using Equation 1 of this section:

$$ER = \frac{C_d \times 1.912 \times 10^{-3} \times Q \times T}{HP-hr} \quad (\text{Eq. 1})$$

Where:

ER = Emission rate of NO_x in g/HP-hr.

C_d = Measured NO_x concentration in parts per million by volume (ppmv).

1.912 × 10⁻³ = Conversion constant for ppm NO_x to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meter per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, horsepower-hour (HP-hr).

(e) To determine compliance with the CO mass per unit output emission limitation, convert the concentration of CO in the engine exhaust using Equation 2 of this section:

$$ER = \frac{C_d \times 1.164 \times 10^{-3} \times Q \times T}{HP - hr} \quad (\text{Eq. 2})$$

Where:

ER = Emission rate of CO in g/HP-hr.

Cd = Measured CO concentration in ppmv.

1.164×10^{-3} = Conversion constant for ppm CO to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

(f) For purposes of this subpart, when calculating emissions of VOC, emissions of formaldehyde should not be included. To determine compliance with the VOC mass per unit output emission limitation, convert the concentration of VOC in the engine exhaust using Equation 3 of this section:

$$ER = \frac{C_d \times 1.833 \times 10^{-3} \times Q \times T}{HP - hr} \quad (\text{Eq. 3})$$

Where:

ER = Emission rate of VOC in g/HP-hr.

Cd = VOC concentration measured as propane in ppmv.

1.833×10^{-3} = Conversion constant for ppm VOC measured as propane, to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

(g) If the owner/operator chooses to measure VOC emissions using either Method 18 of 40 CFR part 60, appendix A, or Method 320 of 40 CFR part 63, appendix A, then it has the option of correcting the measured VOC emissions to account for the potential differences in measured values between these methods and Method 25A. The results from Method 18 and Method 320 can be corrected for response factor differences using Equations 4 and 5 of this section. The corrected VOC concentration can then be placed on a propane basis using Equation 6 of this section.

$$RF_i = \frac{C_m}{C_{Ai}} \quad (\text{Eq. 4})$$

Where:

RF_i = Response factor of compound i when measured with EPA Method 25A.

C_{Mi} = Measured concentration of compound i in ppmv as carbon.

C_{Ai} = True concentration of compound i in ppmv as carbon.

$$C_{i_{meas}} = RF_i \times C_{i_{true}} \quad (\text{Eq. 5})$$

Where:

$C_{i_{corr}}$ = Concentration of compound i corrected to the value that would have been measured by EPA Method 25A, ppmv as carbon.

$C_{i_{meas}}$ = Concentration of compound i measured by EPA Method 320, ppmv as carbon.

$$C_{P_{eq}} = 0.6098 \times C_{i_{meas}} \quad (\text{Eq. 6})$$

Where:

$C_{P_{eq}}$ = Concentration of compound i in mg of propane equivalent per DSCM.

The above requirements pertain to Unit 3 at the facility.

§ 60.4245 *What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?*

Owners or operators of stationary SI ICE must meet the following notification, reporting and recordkeeping requirements.

(a) Owners and operators of all stationary SI ICE must keep records of the information in paragraphs (a)(1) through (4) of this section.

(1) All notifications submitted to comply with this subpart and all documentation supporting any notification.

(2) Maintenance conducted on the engine.

(3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

(4) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards.

(d) Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed.

The facility must meet the notification, reporting, and recordkeeping requirements for Unit 3.

6.5 NESHAP Applicability (40 CFR 61)

The facility is not an affected source subject to NESHAP in 40 CFR 61, and this permitting action does not alter the applicability status of existing affected sources at the facility.

6.6 MACT Applicability (40 CFR 63)

The facility operates four emergency IC engines, three of which are subject to 40 CFR 63, Subpart ZZZZ. Units 1 and 2 are diesel CI RICE and Unit 4 is a natural gas SI RICE installed prior to June 12, 2006. Below is a breakdown of Subpart ZZZZ.

40 CFR 63 Subpart ZZZZ NESHAPS for Stationary Reciprocating Internal Combustion Engines

§ 63.6585 *Am I subject to this subpart?*

You are subject to this Subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

(c) An area source of HAP emissions is a source that is not a major source.

The facility does operate emergency engines periodically throughout the year and they are used in emergency situations only. In addition, the facility is an area source for HAPs as they are below the major source threshold of 10 T/yr for any one federally regulated HAP and 25 T/yr for all HAPs combined.

§ 63.6590 *What parts of my plant does this subpart cover?*

This subpart applies to each affected source.

(a) Affected source. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

(1) Existing stationary RICE.

(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

The engines located at the facility are considered existing as they were constructed prior to 2006.

§ 63.6595

When do I have to comply with the subpart?

(a)(1) If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than June 15, 2007. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. If you have an existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

Units 1 and 2 must be in compliance with the Subpart no later than May 3, 2013 and Unit 4 must be in compliance with the Subpart no later than October 19, 2013.

§ 63.6600 *What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?*

The applicable IC engines are not operating at a major source for HAP emissions. Therefore there are no applicable emission and operating limitations under this section.

§ 63.6601 *What emission limitations must I meet if I own or operate a 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than 500 brake HP located at a major source of HAP emissions?*

The applicable IC engines are not operating at a major source for HAP emissions and the engines are not 4-stroke lean burn spark ignition between 250 and 500 bhp. Therefore there are no applicable emission and operating limitations under this section.

§ 63.6602 *What emission limitations must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?*

The applicable IC engines are not operating at a major source for HAP emissions. Therefore there are no applicable emission and operating limitations under this section.

§ 63.6603 *What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?*

Compliance with the numerical emission limitations established in this Subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this Subpart.

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this Subpart and the operating limitations in Table 2b to this Subpart which apply to you.

Table 2b does not apply as it refers only to CI non-emergency engines greater than 500 bhp at area source facilities. Table 2d, however, identifies those limitations required by area sources to comply with the Subpart. The specifics of Table 2d require that the permittee perform regular maintenance on the applicable engines such as changing oil and filters every 500 operating hours, inspect spark plugs or air cleaners every 1,000 hours of operation and inspect all hoses and belts every 500 hours of operation. Each of the maintenance procedures shall occur at the indicated interval or annually, whichever occurs first.

§ 63.6604 What fuel requirements must I meet if I own or operate an existing stationary CI RICE?

If you own or operate an existing non-emergency, non-black start CI stationary RICE with a site rating of more than 300 brake HP with a displacement of less than 30 liters per cylinder that uses diesel fuel, you must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel.

Existing non-emergency CI stationary RICE located in Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, or at area sources in areas of Alaska not accessible by the FAHS are exempt from the requirements of this section.

The facility operates emergency engines, therefore this section does not apply to the facility.

§ 63.6605 What are my general requirements for complying with this Subpart?

(a) You must be in compliance with the emission limitations and operating limitations in this Subpart that apply to you at all times.

(b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

When operating the IC engines, they must be operated in a manner that is consistent with reducing emissions and compliance with appropriate limitations applies at all times.

§ 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?

The IC engines located at the facility are not required to perform any performance tests and are not operating at a major source for HAP emissions. No testing is required in accordance with Table 2d of the subpart.

§ 63.6611 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?

The IC engines located at the facility are not required to perform any performance tests and are not operating at a major source for HAP emissions. No testing is required in accordance with Table 2d of the subpart.

§ 63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?

The IC engines located at the facility are not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

§ 63.6615 When must I conduct subsequent performance tests?

The IC engines located at the facility are not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

§ 63.6620 *What performance tests and other procedures must I use?*

The IC engines located at the facility are not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

§ 63.6625 *What are my monitoring, installation, collection, operation, and maintenance requirements?*

(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:

(3) An existing emergency or black start stationary RICE located at an area source of HAP emissions;

The IC engines need to be operated in accordance with manufacturer's specifications or a maintenance plan may be developed that is consistent with good air pollution control practices.

(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

A non-resettable meter shall be installed if not previously installed.

(h) If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

Idle startup time may not exceed 30 minutes. Applicable emissions standards must be met following the allowable 30 minutes.

(i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

This section allows the facility to develop their own oil analysis program to modify the oil changing frequency if the program meets all criteria set forth in subsection i of the subpart for Units 1 and 2.

(j) If you own or operate a stationary SI engine that is subject to the work, operation or management practices in items 6, 7, or 8 of Table 2c to this subpart or in items 5, 6, 7, 9, or 11 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water

content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

This section allows the facility to develop their own oil analysis program to modify the oil changing frequency if the program meets all criteria set forth in subsection j of the subpart for Unit 4.

§ 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?

The IC engines are designated as emergency, and do not have any emission or operating limitations. Rather, maintenance requirements are specified in Table 2d of this subpart. Therefore, this section is not applicable.

§ 63.6635 How do I monitor and collect data to demonstrate continuous compliance?

The IC engines are designated as emergency, and do not have any emission or operating limitations. Rather, maintenance requirements are specified in Table 2d of this subpart. As a result data capture is not necessary. Therefore, this section is not applicable.

§ 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?

(a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.

Section 9 of Table 6 of the subpart pertains to the emergency IC engines.

(f) Requirements for emergency stationary RICE. (1) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that was installed on or after June 12, 2006, or an existing emergency stationary RICE located at an area source of HAP emissions, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.

(i) There is no time limit on the use of emergency stationary RICE in emergency situations.

(ii) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.

(iii) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.

The above requirements pertain specifically to the IC emergency engines at the facility.

§ 63.6645 *What notifications must I submit and when?*

(a) You must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified if you own or operate any of the following;

(5) This requirement does not apply if you own or operate an existing stationary RICE less than 100 HP, an existing stationary emergency RICE, or an existing stationary RICE that is not subject to any numerical emission standards.

This section of the subpart is not applicable to the engines at the facility because they are designated as emergency. 63.6645(a)(5) explicitly exempts emergency engines from this requirement.

§ 63.6650 *What reports must I submit and when?*

(a) You must submit each report in Table 7 of this subpart that applies to you.

All required reporting is specified in Table 7. However, Table 7 does not include any requirements for emergency engines. Therefore, this section of the subpart is not applicable.

§ 63.6655 *What records must I keep?*

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;

(2) An existing stationary emergency RICE.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation,

including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

The facility needs to maintain records demonstrating that the engines are being operated in accordance with an appropriate maintenance plan. Records of operational hours from the non-resettable meter must also be kept as well as how many hours were spent in emergency situations and demand response.

§ 63.6660 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

6.7 CAM Applicability (40 CFR 64)

Individual permit units at facilities that are subject to Title V permitting requirements (Tier I permits) may be subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). 40 CFR Part 64 requires CAM for units that meet the following three criteria:

- 1) The unit must have an emission limit for the pollutant;
- 2) The unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) The unit must have a pre-control potential to emit of greater than the major source thresholds.

Boiler No. 1 is equipped with a FGR system, however the pre-control potential to emit is less than 100 tons per year. The Line No. 1 fryer has a PM₁₀ emission limit and is controlled by a WESP, however the pre-control potential to emit is also less than 100 tons per year. Therefore, CAM (Subpart 64) does not apply to this facility.

6.8 Acid Rain Permit (40 CFR 72-75)

The facility is not an affected source subject to the Acid Rain Permit program in 40 CFR 72-75.

7. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from January 3, 2012 to February 2, 2012. 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, DEQ provided the proposed permit to EPA Region 10 for it review and comment on February 6, 2012 via e-mail. On February 8, 2012, EPA Region 10 responded to DEQ via e-mail indicating that EPA will not be reviewing the proposed permit action, will not object to its issuance, and that the permit is now eligible for issuance.

Appendix A – AIRS Information

Appendix B – Emissions Inventory

Caldwell Plant Potential to Emit (TPY)^(a)

	Boiler 8	Boiler 1 - NG Comb	Boiler 1 - Biogas & NG Comb ^(b)	Biogas Flare ^(b)	Dryer 1	Dryer 6	WESP ^(d)	AMUs	Solvent and Adhesive Use ^(e)	Total Emissions	Hazardous Air Pollutant?	Total HAP Emissions
Criteria Air Pollutants												
PM10	2.6	3.2	3.2	0.2	26.3	45.6	47.7	1.8	-	127.4	No	-
NOx	34.7	21.1	21.1	2.3	2.0	5.2	-	24.2	-	89.4	No	-
SO2 ^(b)	0.2	0.3	90.2 (90 tpy limit on biogas comb.)		0.01	0.06	-	0.1	-	90.6	No	-
CO	29.1	35.4	35.4	12.3	1.7	8.7	-	20.3	-	107.5	No	-
VOC	1.9	2.3	2.3	4.8	0.1	0.6	12.7	1.3	2.8	26.3	No	-
Toxic Air Pollutants												
3-Methylchloranthrene	8.2E-07	7.6E-07	7.6E-07	-	3.7E-08	1.9E-07	-	4.3E-07	-	2.0E-06	No	-
Ammonia	1.1E+00	1.4E+00	1.4E+00	-	8.5E-02	3.3E-01	-	-	-	2.9	No	-
Benzene	7.3E-04	8.9E-04	8.9E-04	-	4.3E-05	2.2E-04	-	5.1E-04	-	2.4E-03	Yes	2.4E-03
Benzo(a)pyrene	4.2E-07	5.1E-07	5.1E-07	-	2.4E-08	1.2E-07	-	2.9E-07	-	1.4E-06	No	-
Dichlorobenzene	4.2E-04	5.1E-04	5.1E-04	-	2.4E-05	1.2E-04	-	2.9E-04	-	1.4E-03	No	-
Formaldehyde	2.8E-02	3.2E-02	3.2E-02	-	1.5E-03	7.7E-03	-	1.8E-02	-	8.5E-02	Yes	8.5E-02
Hexane	8.2E-01	7.6E-01	7.6E-01	-	3.7E-02	1.9E-01	-	4.3E-01	-	2.0	Yes	2.0
Naphthalene	2.1E-04	2.6E-04	2.6E-04	-	1.2E-05	6.3E-05	-	1.5E-04	-	6.9E-04	Yes	6.9E-04
Pentane	9.0E-01	1.1E+00	1.1E+00	-	5.3E-02	2.7E-01	-	6.3E-01	-	2.9	No	-
Toluene	1.2E-03	1.4E-03	1.4E-03	-	6.9E-05	3.5E-04	-	8.2E-04	-	3.9E-03	Yes	3.9E-03
Arsenic	8.9E-05	8.4E-05	8.4E-05	-	4.1E-06	2.1E-05	-	4.8E-05	-	2.3E-04	Yes	2.3E-04
Barium	1.5E-03	1.9E-03	1.9E-03	-	9.0E-05	4.5E-04	-	1.1E-03	-	5.0E-03	No	-
Beryllium	4.2E-06	5.1E-06	5.1E-06	-	2.4E-07	1.2E-06	-	2.9E-06	-	1.4E-05	Yes	1.4E-05
Cadmium	3.8E-04	4.6E-04	4.6E-04	-	2.2E-05	1.1E-04	-	2.7E-04	-	1.2E-03	Yes	1.2E-03
Chromium-Total ^(c)	4.9E-04	5.9E-04	5.9E-04	-	2.9E-05	1.4E-04	-	3.4E-04	-	1.6E-03	Yes	1.6E-03
Chromium III	4.0E-04	4.8E-04	4.8E-04	-	2.3E-05	1.2E-04	-	2.8E-04	-	1.3E-03	-	-
Chromium VI	8.7E-05	4.0E-04	1.1E-04	-	5.1E-06	2.6E-05	-	6.1E-05	-	5.8E-04	-	-
Cobalt	2.9E-05	3.5E-05	3.5E-05	-	1.7E-06	8.7E-06	-	2.0E-05	-	9.5E-05	Yes	9.5E-05
Copper	2.9E-04	3.6E-04	3.6E-04	-	1.7E-05	8.8E-05	-	2.1E-04	-	9.6E-04	No	-
Manganese	1.3E-04	1.6E-04	1.6E-04	-	7.8E-06	3.9E-05	-	9.2E-05	-	4.3E-04	Yes	4.3E-04
Mercury	9.0E-05	1.1E-04	1.1E-04	-	5.3E-06	2.7E-05	-	6.3E-05	-	2.9E-04	Yes	2.9E-04
Molybdenum	3.8E-04	4.6E-04	4.6E-04	-	2.2E-05	1.1E-04	-	2.7E-04	-	1.2E-03	No	-
Nickel	7.3E-04	8.9E-04	8.9E-04	-	4.3E-05	2.2E-04	-	5.1E-04	-	2.4E-03	Yes	2.4E-03
Selenium	8.3E-06	1.0E-05	1.0E-05	-	4.9E-07	2.5E-06	-	5.8E-06	-	2.7E-05	Yes	2.7E-05
Zinc	1.0E-02	1.2E-02	1.2E-02	-	5.9E-04	3.0E-03	-	7.0E-03	-	3.3E-02	No	-
Nitrous Oxide	7.6E-01	9.3E-01	9.3E-01	-	4.5E-02	2.3E-01	-	5.3E-01	-	2.5	No	-
Polyaromatic Hydrocarbons (a subset of Toxic Air Pollutants)												
Benzo(a)anthracene	8.2E-07	7.6E-07	7.6E-07	-	3.7E-08	1.9E-07	-	4.3E-07	-	2.0E-06	No	-
Benzo(a)pyrene	4.2E-07	5.1E-07	5.1E-07	-	2.4E-08	1.2E-07	-	2.9E-07	-	1.4E-06	No	-
Benzo(b)fluoranthene	8.2E-07	7.6E-07	7.6E-07	-	3.7E-08	1.9E-07	-	4.3E-07	-	2.0E-06	No	-
Benzo(k)fluoranthene	8.2E-07	7.6E-07	7.6E-07	-	3.7E-08	1.9E-07	-	4.3E-07	-	2.0E-06	No	-
Chrysene	8.2E-07	7.6E-07	7.6E-07	-	3.7E-08	1.9E-07	-	4.3E-07	-	2.0E-06	No	-
Dibenzo(a,h)anthracene	4.2E-07	5.1E-07	5.1E-07	-	2.4E-08	1.2E-07	-	2.9E-07	-	1.4E-06	No	-
Indeno(1,2,3-cd)pyrene	8.2E-07	7.6E-07	7.6E-07	-	3.7E-08	1.9E-07	-	4.3E-07	-	2.0E-06	No	-
PAH Total	4.0E-06	4.8E-06	4.8E-06	-	2.3E-07	1.2E-06	-	2.8E-06	-	10.6	Total HAPs	2.1

Shaded values are emission limits established in prior permits.

(a) This summary table is intended for informational purposes only. The J.R. Simplot Company is not proposing annual emission limits. Annual emissions were based on 8760 hours of operation at the short-term emission rate, except for the annual SO2 emissions from the biogas flare. A permit condition limits SO2 emissions from the biogas flare to 90 TPY.

(b) As proposed in this PTC application, Boiler No.1 and the biogas flare will be capable of combusting biogas generated by the facility's anaerobic digester. Each source is capable of firing all generated biogas on an hourly and annual basis, or the biogas can be split between each source. Please note, biogas combustion emissions are limited to 90 tons SO2/year. However Boiler No.1 can combust the maximum amount of biogas generated plus some additional natural gas, resulting in Boiler No.1 SO2 PTE of 90.2 tons/yr (additional 0.2 tons/yr from natural gas combustion).

(c) AP-42 provides a chromium emission factor for natural gas fired external combustion, but does not include guidance for partitioning emissions between the carcinogenic chromium VI (hexavalent chromium) and the chromium III (trivalent chromium). In the EPA's Study of Hazardous Air Pollutant Emissions from Electric Utility Steam Generating Units - Final Report to Congress (EPA-453R-99-004a), chromium emissions from natural gas-fired units are not included. However, data on speciation of chromium were available from 11 coal- and oil-fired test sites. From these limited data, EPA estimated that the average chromium VI from the coal-fired utilities was 11 percent, and the average from oil-fired utilities was 16 percent. We have conservatively assumed 18 percent of the chromium emissions are chromium VI.

(d) The PM10 emission estimates presented here are from all three dryers. However, as an emission limit this value applies only to the Line 1 dryer.

(e) Additional information regarding the emission calculations for these sources is included in the Caldwell facility's 1995 Tier I Operating Permit application.

BOILER 1 WITH BIOGAS BURNER

Total Boiler Heat Input Capacity	98.25	MMBtu/hr
Maximum Nat'l gas Fuel Usage*	0.096	MMscf/hr

*(based on 1020 Btu/scf) and
8,760 Permitted Hours of Operation/yr

With Addition of Maximum Biogas Combustion Capacity to the boiler:

	Short-term (hourly at peak)	Long-Term (annual maximum)
Fraction from Nat'l gas	80.62%	86.19%
scf biogas/averaging time	31,740	198,092,842
MMBtu/averaging time	19.0	118,856

Biogas parameters:

600 Btu/scf, HHV biogas
0.6 methane, fraction CH₄ of biogas

Pollutant	Emission Factor (lb/MMBtu) ^(a)	Potential to Emit		Project Increase		Modeling De Minimus Thresholds ^(b)		Over Modeling Threshold?
		lb/hr	TPY	lb/hr	TPY	(lb/hr)	(TPY)	
NOx	0.049	4.8	21.1	0.00	0.00	—	1	No
CO	0.082	8.1	35.4	0.00	0.00	14	—	No
SO ₂ ^(c)	—	28.9	90.2	28.8	90	0.2	1	Yes
PM-10	0.0075	0.7	3.2	0.00	0.00	0.2	1	No
VOC	0.0054	0.5	2.3	0.00	0.00	—	—	No

Greenhouse Gas	Emission Factor ^d (lb/MMBtu)	Potential to Emit	
		lb/hr	TPY
CO ₂	117	11484	50302
CH ₄	2.20E-03	2.16E-01	9.47E-01
N ₂ O	2.20E-04	2.16E-02	9.47E-02

Pollutant	CAS No.	Emission Factor (lb/MMBtu) ^(a)	lb/hr	lb/yr ^(h)
Arsenic	7440-38-2	2.0E-07	1.93E-05	1.69E-01
Barium	7440-39-3	4.3E-06	4.24E-04	3.71E+00
Benzene	71-43-2	2.1E-06	2.02E-04	1.77E+00
Beryllium	7440-41-7	1.2E-08	1.16E-06	1.01E-02
Cadmium	7440-43-9	1.1E-06	1.06E-04	9.28E-01
Chromium-Total ^(e)	7440-47-3	1.4E-06	1.35E-04	1.18E+00
Chromium III	7440-47-3	1.1E-06	1.11E-04	9.69E-01
Chromium VI	7440-47-3	2.5E-07	2.43E-05	2.13E-01
Cobalt	7440-48-4	8.2E-08	8.09E-06	7.09E-02
Copper	7440-50-8	8.3E-07	8.19E-05	7.17E-01
Formaldehyde	50-00-0	7.4E-05	7.22E-03	6.33E+01
Hexane	110-54-3	1.8E-03	1.73E-01	1.52E+03
Manganese	7439-96-5	3.7E-07	3.66E-05	3.21E-01
Mercury	7439-97-6	2.5E-07	2.50E-05	2.19E-01
Molybdenum	7439-98-7	1.1E-06	1.06E-04	9.28E-01
Naphthalene	91-20-3	6.0E-07	5.88E-05	5.15E-01
Nickel	7440-02-0	2.1E-06	2.02E-04	1.77E+00
Pentane	109-66-0	2.5E-03	2.50E-01	2.19E+03
Selenium	7782-49-2	2.4E-08	2.31E-06	2.03E-02
Toluene	108-88-3	3.3E-06	3.28E-04	2.87E+00
Nitrous Oxide	10024-97-2	2.2E-03	2.12E-01	1.86E+03
Benzo(a)anthracene	56-55-3	1.8E-09	1.73E-07	1.52E-03
Benzo(a)pyrene	50-32-8	1.2E-09	1.16E-07	1.01E-03
Benzo(b)fluoranthene	205-99-2	1.8E-09	1.73E-07	1.52E-03
Benzo(k)fluoranthene	207-08-9	1.8E-09	1.73E-07	1.52E-03
Chrysene	218-01-9	1.8E-09	1.73E-07	1.52E-03
Dibenzo(a,h)anthracene	53-70-3	1.2E-09	1.16E-07	1.01E-03
Indeno(1,2,3-cd)pyrene	193-39-5	1.8E-09	1.73E-07	1.52E-03
3-Methylchloranthrene	91-57-6	1.8E-09	1.73E-07	1.52E-03
Dichlorobenzene	23521-22-6	1.2E-06	1.16E-04	1.01E+00
Zinc	7440-66-6	2.8E-05	2.79E-03	2.45E+01
Ammonia ^(f)	7664-41-7	3.1E-03	3.08E-01	2.70E+03
PAH (total) ^(g)	-	-	1.10E-06	9.62E-03

(a) Emission Factors from AP-42 Section 1.4, Natural Gas Combustion, July 1998. Converted to lb/MMBtu using 1020 Btu/cf natural gas.

(b) Modeling thresholds from Table 1 of the State of Idaho Air Quality Modeling Guideline (Doc. ID AQ-011 (rev. 1/12/31/02)).

(c) SO₂ emissions based on firing combination of biogas (1,514 lb/MMscf methane) and natural gas (0.6 lb/MMscf natural gas).

(d) Emission factors for Greenhouse Gas emission from 40 CFR 98, Subpart C, Tables C-1 and C-2.

(e) AP-42 provides a chromium emission factor for natural gas fired external combustion, but does not include guidance for partitioning emissions between the carcinogenic chromium VI (hexavalent chromium) and the chromium III (trivalent chromium). In the EPA's Study of Hazardous Air Pollutant Emissions from Electric Utility Steam Generating Units - Final Report to Congress (EPA-453/R-98-004a), chromium emissions from natural gas-fired units are not included. However, data on speciation of chromium were available from 11 coal- and oil-fired test sites. From these limited data, EPA estimated that the average chromium VI from the coal-fired utilities was 11 percent, and the average from oil-fired utilities was 18 percent. We have conservatively assumed 18 percent of the chromium emissions are chromium VI.

(f) Ammonia emission factor from EPA's WebFIRE database (http://cfpub.epa.gov/oarweb/index.cfm?action=fire_main)

(g) (Polycyclic Organic Matter) For emissions of PAH mixtures, the following PAHs and shall be considered together as one TAP, equivalent in potency to benzo(a)pyrene: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. (WA)

(h) Assume 8,760 hours of operation per year.

BOILER 8

Pollutant	Emission Factor (lb/MMscf) ^(a)	Potential to Emit	
		lb/hr	TPY
NOx	100.0	7.9	34.7
CO	84.0	6.7	29.1
SO2	0.6	0.05	0.2
PM-10	7.6	0.6	2.6
VOC	5.5	0.4	1.9

Heat Input Capacity	80.8	MMBtu/hr
Fuel Usage*	0.079	MMscf/hr
*(based on 1020 Btu/scf)		

Greenhouse Gas	Emission Factor ^(b) (lb/MMBtu)	Potential to Emit	
		lb/hr	TPY
CO2	117	9445	41368
CH4	2.20E-03	1.78E-01	7.79E-01
N2O	2.20E-04	1.78E-02	7.79E-02

Pollutant	Emission Factor (lb/MMscf) ^(a)	lb/hr	TPY
3-Methylchloranthrene	1.80E-06	1.43E-07	6.25E-07
Ammonia	3.20	0.25	1.11
Benzene	2.10E-03	1.66E-04	7.29E-04
Benzo(a)pyrene	1.20E-06	9.51E-08	4.16E-07
Dichlorobenzene	1.20E-03	9.51E-05	4.16E-04
Formaldehyde	7.50E-02	5.94E-03	2.60E-02
Hexane	1.8	1.43E-01	6.25E-01
Naphthalene	6.10E-04	4.83E-05	2.12E-04
Pentane	2.6	2.06E-01	9.02E-01
Toluene	3.40E-03	2.69E-04	1.18E-03
Arsenic	2.00E-04	1.58E-05	6.94E-05
Barium	4.40E-03	3.49E-04	1.53E-03
Beryllium	1.20E-05	9.51E-07	4.16E-06
Cadmium	1.10E-03	8.71E-05	3.82E-04
Chromium-Total ^(c)	1.40E-03	1.11E-04	4.86E-04
Chromium III	1.15E-03	9.09E-05	3.98E-04
Chromium VI	2.52E-04	2.00E-05	8.74E-05
Cobalt	8.40E-05	6.65E-06	2.91E-05
Copper	8.50E-04	6.73E-05	2.95E-04
Manganese	3.80E-04	3.01E-05	1.32E-04
Mercury	2.60E-04	2.06E-05	9.02E-05
Molybdenum	1.10E-03	8.71E-05	3.82E-04
Nickel	2.10E-03	1.66E-04	7.29E-04
Selenium	2.40E-05	1.90E-06	8.33E-06
Zinc	2.90E-02	2.30E-03	1.01E-02
Nitrous oxide	2.2	1.74E-01	7.63E-01

PAHs			
Pollutant	Emission Factor (lb/MMscf) ^(a)	lb/hr	TPY
Benzo(a)anthracene	1.80E-06	1.43E-07	6.25E-07
Benzo(a)pyrene	1.20E-06	9.51E-08	4.16E-07
Benzo(b)fluoranthene	1.80E-06	1.43E-07	6.25E-07
Benzo(k)fluoranthene	1.80E-06	1.43E-07	6.25E-07
Chrysene	1.80E-06	1.43E-07	6.25E-07
Dibenzo(a,h)anthracene	1.20E-06	9.51E-08	4.16E-07
Indeno(1,2,3-cd)pyrene	1.80E-06	1.43E-07	6.25E-07
PAH Total		9.0E-07	4.0E-06

(a) Emission Factors from AP-42 Section 1.4, Natural Gas Combustion, July 1998.

(b) Emission factors for Greenhouse Gas emission from 40 CFR 98, Subpart C, Tables C-1 and C-2.

(c) AP-42 provides a chromium emission factor for natural gas fired external combustion, but does not include guidance for partitioning emissions between the carcinogenic chromium VI (hexavalent chromium) and the chromium III (trivalent chromium). In the EPA's Study of Hazardous Air Pollutant Emissions from Electric Utility Steam Generating Units - Final Report to Congress (EPA-453/R-98-004a), chromium emissions from natural gas-fired units are not included. However, data on speciation of chromium were available from 11 coal- and oil-fired test sites. From these limited data, EPA estimated that the average chromium VI from the coal-fired utilities was 11 percent, and the average from oil-fired utilities was 18 percent. We have conservatively assumed 18 percent of the chromium emissions are chromium VI.

DRYER 1

Pollutant	Emission Factor (lb/MMscf) ^(a)	Potential to Emit	
		lb/hr	TPY
NOx	100.0	0.5	2.0
CO	84.0	0.4	1.7
SO2	0.6	0.003	0.01
PM-10 ^(b)		6.0	26.3
VOC	5.5	0.03	0.1

Heat Input Capacity	4.75	MMBtu/hr
Fuel Usage*	0.005	MMscf/hr
*(based on	1020	Btu/scf)

Greenhouse Gas	Emission Factor ^(c) (lb/MMBtu)	Potential to Emit	
		lb/hr	TPY
CO2	117	555	2432
CH4	2.20E-03	1.05E-02	4.58E-02
N2O	2.20E-04	1.05E-03	4.58E-03

Pollutant	Emission Factor (lb/MMscf) ^(a)	lb/hr	TPY
3-Methylchloranthrene	1.80E-06	8.38E-09	3.67E-08
Ammonia	3.20	0.01	0.07
Benzene	2.10E-03	9.78E-06	4.28E-05
Benzo(a)pyrene	1.20E-06	5.59E-09	2.45E-08
Dichlorobenzene	1.20E-03	5.59E-06	2.45E-05
Formaldehyde	7.50E-02	3.49E-04	1.53E-03
Hexane	1.8	8.38E-03	3.67E-02
Naphthalene	6.10E-04	2.84E-06	1.24E-05
Pentane	2.6	1.21E-02	5.30E-02
Toluene	3.40E-03	1.58E-05	6.94E-05
Arsenic	2.00E-04	9.31E-07	4.08E-06
Barium	4.40E-03	2.05E-05	8.97E-05
Beryllium	1.20E-05	5.59E-08	2.45E-07
Cadmium	1.10E-03	5.12E-06	2.24E-05
Chromium-Total ^(d)	1.40E-03	6.52E-06	2.86E-05
Chromium III	1.15E-03	5.35E-06	2.34E-05
Chromium VI	2.52E-04	1.17E-06	5.14E-06
Cobalt	8.40E-05	3.91E-07	1.71E-06
Copper	8.50E-04	3.96E-06	1.73E-05
Manganese	3.80E-04	1.77E-06	7.75E-06
Mercury	2.60E-04	1.21E-06	5.30E-06
Molybdenum	1.10E-03	5.12E-06	2.24E-05
Nickel	2.10E-03	9.78E-06	4.28E-05
Selenium	2.40E-05	1.12E-07	4.90E-07
Zinc	2.90E-02	1.35E-04	5.92E-04
Nitrous Oxide	2.2	0.01	4.49E-02

PAHs			
Pollutant	Emission Factor (lb/MMscf) ^(a)	lb/hr	TPY
Benz(a)anthracene	1.80E-06	8.38E-09	3.67E-08
Benzo(a)pyrene	1.20E-06	5.59E-09	2.45E-08
Benzo(b)fluoranthene	1.80E-06	8.38E-09	3.67E-08
Benzo(k)fluoranthene	1.80E-06	8.38E-09	3.67E-08
Chrysene	1.80E-06	8.38E-09	3.67E-08
Dibenzo(a,h)anthracene	1.20E-06	5.59E-09	2.45E-08
Indeno(1,2,3-cd)pyrene	1.80E-06	8.38E-09	3.67E-08
PAH Total		6.3E-08	2.3E-07

(a) Emission Factors from AP-42 Section 1.4, Natural Gas Combustion, July 1998.

(b) The hourly PM10 emission rate is not based upon AP-42 emission factors. It is based upon source-specific source test results.

(c) Emission factors for Greenhouse Gas emission from 40 CFR 98, Subpart C, Tables C-1 and C-2.

(d) AP-42 provides a chromium emission factor for natural gas fired external combustion, but does not include guidance for partitioning emissions between the carcinogenic chromium VI (hexavalent chromium) and the chromium III (trivalent chromium). In the EPA's Study of Hazardous Air Pollutant Emissions from Electric Utility Steam Generating Units - Final Report to Congress (EPA-453/R-98-004a), chromium emissions from natural gas-fired units are not included. However, data on speciation of chromium were available from 11 coal- and oil-fired test sites. From these limited data, EPA estimated that the average chromium VI from the coal-fired utilities was 11 percent, and the average from oil-fired utilities was 18 percent. We have conservatively assumed 18 percent of the chromium emissions are chromium VI.

DRYER 6

Pollutant	Emission Factor (lb/MMscf) ^(a)	Potential to Emit	
		lb/hr	TPY
NOx	50.0	1.2	5.2
CO	84.0	2.0	8.7
SO2	0.6	0.014	0.06
PM-10 ^(b)		10.4	45.6
VOC	5.5	0.1	0.6

Heat Input	24	MMBtu/hr
Capacity		
Fuel Usage*	0.024	MMscf/hr
*(based on	1020	Btu/scf)

Greenhouse Gas	Emission Factor ^(c) (lb/MMBtu)	Potential to Emit	
		lb/hr	TPY
CO2	117	2805	12287
CH4	2.20E-03	5.28E-02	2.31E-01
N2O	2.20E-04	5.28E-03	2.31E-02

Pollutant	Emission Factor (lb/MMscf) ^(a)	lb/hr	TPY
3-Methylchloranthrene	1.80E-06	4.24E-08	1.86E-07
Ammonia	3.20	0.08	0.33
Benzene	2.10E-03	4.94E-05	2.16E-04
Benzo(a)pyrene	1.20E-06	2.82E-08	1.24E-07
Dichlorobenzene	1.20E-03	2.82E-05	1.24E-04
Formaldehyde	7.50E-02	1.76E-03	7.73E-03
Hexane	1.8	4.24E-02	1.86E-01
Naphthalene	6.10E-04	1.44E-05	6.29E-05
Pentane	2.6	6.12E-02	2.68E-01
Toluene	3.40E-03	8.00E-05	3.50E-04
Arsenic	2.00E-04	4.71E-06	2.06E-05
Barium	4.40E-03	1.04E-04	4.53E-04
Beryllium	1.20E-05	2.82E-07	1.24E-06
Cadmium	1.10E-03	2.59E-05	1.13E-04
Chromium-Total ^(d)	1.40E-03	3.29E-05	1.44E-04
Chromium III	1.15E-03	2.70E-05	1.18E-04
Chromium VI	2.52E-04	5.93E-06	2.60E-05
Cobalt	8.40E-05	1.98E-06	8.66E-06
Copper	8.50E-04	2.00E-05	8.76E-05
Manganese	3.80E-04	8.94E-06	3.92E-05
Mercury	2.60E-04	6.12E-06	2.68E-05
Molybdenum	1.10E-03	2.59E-05	1.13E-04
Nickel	2.10E-03	4.94E-05	2.16E-04
Selenium	2.40E-05	5.65E-07	2.47E-06
Zinc	2.90E-02	6.82E-04	2.99E-03
Nitrous Oxide	2.2	0.05	2.27E-01

PAHs			
Pollutant	Emission Factor (lb/MMscf) ^(a)	lb/hr	TPY
Benz(a)anthracene	1.80E-06	4.24E-08	1.86E-07
Benzo(a)pyrene	1.20E-06	2.82E-08	1.24E-07
Benzo(b)fluoranthene	1.80E-06	4.24E-08	1.86E-07
Benzo(k)fluoranthene	1.80E-06	4.24E-08	1.86E-07
Chrysene	1.80E-06	4.24E-08	1.86E-07
Dibenzo(a,h)anthracene	1.20E-06	2.82E-08	1.24E-07
Indeno(1,2,3-cd)pyrene	1.80E-06	4.24E-08	1.86E-07
PAH Total		2.7E-07	1.2E-06

(a) Emission Factors from AP-42 Section 1.4, Natural Gas Combustion, July 1998.

(b) The hourly PM10 emission rate is not based upon AP-42 emission factors. It is based upon source-specific source test results.

(c) Emission factors for Greenhouse Gas emission from 40 CFR 98, Subpart C, Tables C-1 and C-2.

(d) AP-42 provides a chromium emission factor for natural gas fired external combustion, but does not include guidance for partitioning emissions between the carcinogenic chromium VI (hexavalent chromium) and the chromium III (trivalent chromium). In the EPA's Study of Hazardous Air Pollutant Emissions from Electric Utility Steam Generating Units - Final Report to Congress (EPA-453/R-98-004a), chromium emissions from natural gas-fired units are not included. However, data on speciation of chromium were available from 11 coal- and oil-fired test sites. From these limited data, EPA estimated that the average chromium VI from the coal-fired utilities was 11 percent, and the average from oil-fired utilities was 18 percent. We have conservatively assumed 18 percent of the chromium emissions are chromium VI.

AIR MAKEUP UNITS

Pollutant	Emission Factor (lb/MMscf) ^(a)	Potential to Emit	
		lb/hr	TPY
NOx	100.0	5.5	24.17
CO	84.0	4.6	20.30
SO2	0.6	0.03	0.14
PM-10	7.6	0.42	1.84
VOC	5.5	0.30	1.33

Heat Input Capacity	56.3	MMBtu/hr
Fuel Usage*	0.055	MMscf/hr
*(based on 1020 Btu/scf)		

Greenhouse Gas	Emission Factor ^(b) (lb/MMBtu)	Potential to Emit	
		lb/hr	TPY
CO2	117	6578	28812
CH4	2.20E-03	1.24E-01	5.42E-01
N2O	2.20E-04	1.24E-02	5.42E-02

Pollutant	Emission Factor (lb/MMscf) ^(a)	lb/hr	TPY
3-Methylchloranthrene	1.80E-06	9.93E-08	4.35E-07
Ammonia	3.20	0.18	0.77
Benzene	2.10E-03	1.16E-04	5.07E-04
Benzo(a)pyrene	1.20E-06	6.62E-08	2.90E-07
Dichlorobenzene	1.20E-03	6.62E-05	2.90E-04
Formaldehyde	7.50E-02	4.14E-03	1.81E-02
Hexane	1.8	9.93E-02	4.35E-01
Naphthalene	6.10E-04	3.37E-05	1.47E-04
Pentane	2.6	1.43E-01	6.28E-01
Toluene	3.40E-03	1.88E-04	8.22E-04
Arsenic	2.00E-04	1.10E-05	4.83E-05
Barium	4.40E-03	2.43E-04	1.06E-03
Beryllium	1.20E-05	6.62E-07	2.90E-06
Cadmium	1.10E-03	6.07E-05	2.66E-04
Chromium-Total ^(c)	1.40E-03	7.72E-05	3.38E-04
Chromium III	1.15E-03	6.33E-05	2.77E-04
Chromium VI	2.52E-04	1.39E-05	6.09E-05
Cobalt	8.40E-05	4.63E-06	2.03E-05
Copper	8.50E-04	4.69E-05	2.05E-04
Manganese	3.80E-04	2.10E-05	9.18E-05
Mercury	2.60E-04	1.43E-05	6.28E-05
Molybdenum	1.10E-03	6.07E-05	2.66E-04
Nickel	2.10E-03	1.16E-04	5.07E-04
Selenium	2.40E-05	1.32E-06	5.80E-06
Zinc	2.90E-02	1.60E-03	7.01E-03
Nitrous oxide	2.2	1.21E-01	5.32E-01

PAHs			
Pollutant	Emission Factor (lb/MMscf) ^(a)	lb/hr	TPY
Benz(a)anthracene	1.80E-06	9.93E-08	4.35E-07
Benzo(a)pyrene	1.20E-06	6.62E-08	2.90E-07
Benzo(b)fluoranthene	1.80E-06	9.93E-08	4.35E-07
Benzo(k)fluoranthene	1.80E-06	9.93E-08	4.35E-07
Chrysene	1.80E-06	9.93E-08	4.35E-07
Dibenzo(a,h)anthracene	1.20E-06	6.62E-08	2.90E-07
Indeno(1,2,3-cd)pyrene	1.80E-06	9.93E-08	4.35E-07
PAH Total		6.28956E-07	2.75E-06

AMU	Heat Input Capacity (MMBtu/hr)
AMU Heater S-C-H4	5.4
AMU Heater S-C-H5	10.125
AMU Heater S-C-H6	5.5
AMU Heater S-C-H7	5.55
AMU Heater S-C-H8	5.4
AMU Heater S-C-H9	5.4
AMU Heater S-C-H10	5.4
AMU Heater S-C-H11	5.5
AMU Heater S-C-H12	8.0
Total Input Capacity	56.3

(a) Emission Factors from AP-42 Section 1.4, Natural Gas Combustion, July 1998.
 (b) Emission factors for Greenhouse Gas emission from 40 CFR 98, Subpart C, Tables C-1 and C-2.
 (c) AP-42 provides a chromium emission factor for natural gas fired external combustion, but does not include guidance for partitioning emissions between the carcinogenic chromium VI (hexavalent chromium) and the chromium III (trivalent chromium). In the EPA's Study of Hazardous Air Pollutant Emissions from Electric Utility Steam Generating Units - Final Report to Congress (EPA-453/R-88-004a), chromium emissions from natural gas-fired units are not included. However, data on speciation of chromium were available from 11 coal- and oil-fired test sites. From these limited data, EPA estimated that the average chromium VI from the coal-fired utilities was 11 percent, and the average from oil-fired utilities was 18 percent. We have conservatively assumed 18 percent of the chromium emissions are chromium VI.

BIOGAS FLARE

Pollutant	Emission Factor (lb/MMscf) ^(a)	Emission Factor (lb/MMBtu) ^(b)	Potential to Emit	
			lb/hr	TPY
NOx	-	0.068	0.5	2.3
CO	-	0.37	2.8	12.3
SO ₂ ^(c)	-	-	--	90.0
PM-10	4.5	-	0.1	0.2
VOC	-	0.14	1.1	4.6

Biogas Flow Rate	0.01261	MMscf/hr
Biogas Heat Content	600	btu/scf
Flare Heat Capacity	7.6	MMbtu/hr

Greenhouse Gas	Emission Factor ^(d) (lb/MMBtu)	Potential to Emit	
		lb/hr	TPY
CO ₂	117	884	3874
CH ₄	2.20E-03	1.66E-02	7.29E-02
N ₂ O	2.20E-04	1.66E-03	7.29E-03

(a) Emission Factors from AP-42 Section 1.4, Natural Gas Combustion, July 1998, except the emission factors were scaled down to represent the lower heat value (600 btu/scf) of the biogas.

(b) Emission factors from AP-42 Section 13.5, Industrial Flares, September 1991. This Section contained emission factors for only Nox, CO and VOCs.

(c) The SO₂ annual emission limit was based upon the PTC for the Biogas Flare.

(d) Emission factors for Greenhouse Gas emission from 40 CFR 98, Subpart C, Tables C-1 and C-2.

WET ELECTROSTATIC PRECIPITATOR (WESP)

Pollutant	Potential to Emit	
	lb/hr	TPY
PM-10	10.9	47.7
VOC	2.9	12.7

(a) The hourly PM10 and VOC emission rates are based on the Line 1 Fryer's emission limits.

(b) This table presents the estimated emissions from the WESP for all three fryers. However, as an emission limit these values apply only to the Line 1 fryer.

Simplot Caldwell Greenhouse Gas Calculations

Hypothetical Gas Consumption and Greenhouse Gas Emissions

	Capacity Gas Consumption		CO2e
	MMBtu/hr	MMBtu/yr*	tons/yr
Boiler 1	98	860,670	50,351
Boiler 8	81	707,808	41,408
Dryer 1	5	41,610	2,434
Dryer 6	24	210,240	12,299
AMUs	56	493,188	28,852
Total	264	2,313,516	135,345

* Assumes 8760 hours of operation

Gas Consumption and Greenhouse Gas Emissions Considering Design Restrictions

	Design Gas Consumption	CO2e
	MMBtu/yr	tons/yr
2008 Actual	859,399	50,276
Scaled to 365 days	1,089,169	63,718

Greenhouse Gas	Emis. Factor ^a lb/MMBtu	Global Warming Potential ^b
CO2	117	1
CH4	0.002205	21
N2O	0.000220	310
CO2e	116.89	117.00 lb/MMBtu

notes:

a - Greenhouse Gas emission factors from 40 CFR 98, Subpart C, Table C-1.

b - 40 CFR Part 98, Subpart A

Appendix C – Facility Comments for Draft Permit

The following comments were received from the facility on December 23, 2011:

Facility Comment: Section 3 Summary Description should be revised to state that the Line No. 4 production line had a permit change with PTC No. P-2007.0073 which changed the production line from French fry to pre-formed potato products. The PTC also deleted the Line No. 4 dryer. The Line No. 5 fryer was installed in 2007. The rated capacity of Line No. 5 fryer is 8,600 pounds per eight-hour shift. Remove the Production Line No. 5 dryer from Table 3.1.

DEQ Response: Section 3 has been revised and the Line No. 5 dryer has been removed from Table 3.1.

Facility Comment: Permit Condition 6.4 should be revised to state that once the biogas flow rate is monitored, the biogas flow rate will be limited to an average of 10,000,000 scf of methane per month during any 12-month period.

DEQ Response: Permit Condition 6.4 has been revised.

Facility Comment: Permit Condition 6.7 should be revised to state that the biogas flow rate shall be monitored continuously and an accumulated amount recorded once per month. The biogas will also be tested for methane once per week based on the requirements of 40 CFR 98.350, Subpart II, and the weekly reading will be averaged and recorded once per month.

DEQ Response: Permit Condition 6.7 has been revised.

Facility Comment: Permit Condition 6.10 should be removed because the initial compliance test was completed in 2003 and was well below 75% of the concentration limit.

DEQ Response: Permit Condition 6.10 has been deleted because the initial compliance test was completed and approved by DEQ in 2004. Performance testing requirements were removed in P-2009.0136 and were in the prior Tier I permit as a gap-filling measure. The initial compliance test was below 60% of the emission limit and no further testing is required.

Facility Comment: J.R. Simplot Company requests concurrence that the design constraints at the facility serve to limit the facility's potential greenhouse gas emissions to levels below the major source threshold at 63,718 tons per year of CO₂e.

DEQ Response: DEQ concurs that the potential greenhouse gas emissions is in fact limited by the design capacity of the production lines. Therefore, potential greenhouse gas emissions will be changed to 63,718 tons per year of CO₂e.