

Statement of Basis

**Permit to Construct No. P-2011.0132
Project ID 60943**

**Basic American Foods, a Division of Basic American, Inc.
Rexburg, Idaho**

Facility ID 065-00008

Facility Review

**January 5, 2012
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Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CBP	concrete batch plant
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
GHG	greenhouse gases
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HHV	higher heating value
HMA	hot mix asphalt
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
iwg	inches of water gauge
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards

O&M	operation and maintenance
O ₂	oxygen
PAH	polyaromatic hydrocarbons
PC	permit condition
PCB	polychlorinated biphenyl
PERF	Portable Equipment Relocation Form
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
PW	process weight rate
RAP	recycled asphalt pavement
RFO	reprocessed fuel oil
RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TEQ	toxicity equivalent
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
ULSD	ultra-low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compounds
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

The Basic American Foods (BAF) Rexburg facility produces a variety of dehydrated food products for both internal use and for external customers. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. BAF uses a variety of dehydration technologies to produce products to meet exacting customer specifications. The main sources of air emissions include boilers, dryers, dehydration lines, pneumatic material transfer, and packaging operations. Steam for plant operations is provided by boiler numbers 1 and 2 and the Kipper & Sons boiler. Since the current T2/PTC was issued, the Erie City boiler that was Boiler 2 has been replaced with a 49.9 MMBTU/hr Murray boiler. This change was exempt from PTC review in accordance with IDAPA 58.01.01.222.02.c.

Materials transport occurs both internally within a processing activity and externally to transfer materials between processes, to place them into or take them out of bulk storage, or to transport them to packaging and load-out activities. BAF uses air suspension systems to transport granules and most formulated products; these suspension processes include air slides and pneumatic bulk transfer operations. BAF also uses belt and bucket conveyors at various locations in its operations to transport raw materials, products in processing, and finished products. All bucket and belt conveyors are entirely contained within enclosed buildings. BAF also uses wet flumes to transport raw potatoes. Forklifts are used to transfer tote containers within the plant. Materials recovery units (primarily cyclones and baghouses) are integral to the operation of all unit processes in which granules or formulated products are suspended in air.

BAF operates packaging equipment to fill product containers with bulk product. Spices and flavoring may be added to the bulk product during the packaging process. Dust pickups located within the packaging area exhaust to the atmosphere through baghouses.

Raw materials are received on site by truck. Granules can be received by rail as well as by truck. All shipments are by rail or truck. Trucks are also used to move potatoes to and from the onsite cellars.

Plant process heating is provided by both direct firing with natural gas and indirect heating using steam supplied by facility boilers. Plant space heating is by natural gas.

Plant products are described as follows.

Dehydrated potato granules

Potato granules are individual potato cells prepared from raw potatoes by cooking, followed by gentle drying. Granules typically range from 50 to 120 microns in size. Most of the granules produced at the Shelley Plant are used at the Shelley Plant; occasionally granules are shipped to other BAF plants for use in products produced at those plants.

Dehydrated piece food products

BAF prepares dehydrated piece food products by dehydrating cooked and/or blanched foods. These foods can be either whole vegetables or vegetable pieces. Piece products range up to several inches in diameter.

Food processing byproducts

Sellable food fractions and off-specification materials that are not suitable for use in other products are produced as by-products of plant processes. BAF uses various materials classification processes to segregate, collect, and transport these byproducts. Food byproducts are transferred directly to load-out operations after collection without further processing beyond collection.

Air suspension unit processes are also used to classify materials and to remove unsuitable fractions from the production stream.

Food processing by-products are produced from food fractions that are not suitable for sale as primary products.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

October 8, 2008	T2-2008.0109, Permit to include existing requirements for the facility's Kipper boiler, and to also satisfy PTC requirements for new or modified sources that potentially required a PTC, but for which a PTC was not obtained prior to construction, Permit status (A, but will become S upon issuance of this permit)
June 10, 2008	T1-2008.0053, Tier I Operating Permit Modification – Incorporate Tier II Operating Permit No. T2-030515, Permit status (S)
June 10, 2008	T2-030515, Facility-wide Tier Operating Permit and Permit to Construct, Permit status (S)
April 16, 2008	T1-060513, Tier I Operating Permit Renewal, Permit status (S)
December 11, 2002	Initial Tier I Operating Permit No. 065-00008 issued, Permit status (S)
May 8, 1984	PTC Letter was amended to clarify coal/wood input limits, Permit status (S)
April 30, 1981	PTC Letter was amended to revise test dates, Permit status (S)
July 30, 1980	PTC Letter (no number assigned) for the Kipper & Sons boiler issued, Permit status (S)

Application Scope

This Applicant has proposed to convert their existing Tier II permit to a PTC.

In addition, the facility has requested that previous modifications to the Ventri-Rod[®] Scrubber and Multiclone be discussed. Per the Applicant, the original design of the Ventri-Rod[®] Scrubber and Multiclone had movable rods which were a maintenance nightmare. Therefore, some years ago the movement controls were removed from this emissions control device. At this time additional rods and spray nozzles were also added to enhance particulate capture by the control device. The Applicant also states that this modification to the Ventri-Rod[®] Scrubber and Multiclone preceded the CAM testing on which ongoing compliance with PM standards is based.

Application Chronology

October 17, 2011	DEQ received an application and an application fee.
November 9, 2011	DEQ determined that the application was complete.
January 5, 2012	DEQ made available the draft permit and statement of basis for peer and regional office review.
January 5, 2012	DEQ made available the draft permit and statement of basis for applicant review.
Month Day, Year	DEQ received the permit processing fee.
Month Day, Year	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emission Point ID No.
Boilers			
Kipper & Sons Boiler	Manufacturer: Kipper & Sons Model: N/A S/N: 1300 Heat input rating: 90.0 MMBtu/hr Maximum steam production rate: 65,000 lb/hr Fuels: Coal (39% by weight) and wood Date installed: 1981	Zurn multiclone and Riley Ventri-rod [®] scrubber	
Boiler 1	Manufacturer: Erie City Model: Not given on Boiler Name Plate S/N: 96047 Heat input rating: 52 MMBtu/hr (Not given on Boiler Name Plate) Maximum steam production rate: 40,000 lb/hr Fuels: Natural gas only Date installed: Prior to 1965	None	
Boiler 2	Manufacturer: Murray Model: MCF3-43 S/N: 10509 Heat input rating: 49.9 MMBtu/hr Maximum steam production rate: 40,000 lb/hr Fuels: Natural gas only Date installed: 2010	None	
Process A			
7020	Cooler/Dryer 7020 (Cooler vent)	None	
7101	Cooler/Dryer 7101 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None	
7102	Cooler/Dryer 7102 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None	
7019	Cooler/Dryer 7019 (Dryer, 6.6 MMBtu/hr, steam and natural gas)	None	
7001	Cooler/Dryer 7001 (Dryer, steam-heated)	None	
7027	Cooler/Dryer 7027 (Cooler)	None	
7006	Material Recovery Unit 7006	None	

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION (Continued)

Source ID No.	Sources	Control Equipment	Emission Point ID No.
Process B			
5034	Material Recovery Unit 5034	None	
5037	Cooler/Dryer 5037 (Cooler/dryer vent, dryer is steam heated)	None	
4000	Cooler/Dryer 4000 (Dryer, steam heated)	None	
228	Cooler/Dryer 228 (Dryer, natural gas-fired, 16.1 MMBtu/hr)	None	
234	Cooler/Dryer 234 (Second exhaust from dryer 228)	None	
410/411	Cooler/Dryer 410/411 (Dryer vent, steam-heated)	None	
311	Cooler/Dryer 311 (Dryer vent, steam-heated)	None	
312	Cooler/Dryer 312 (Dryer vent, steam-heated)		
638	Cooler/Dryer 638 (Dryer vent, steam-heated)	None	
613/614	Cooler/Dryer 613/614 (Dryer vent, steam heated)	None	
615/616	Cooler/Dryer 615/616 (Dryer vent, steam heated)	None	
707	Material Recovery Unit 707 (fabric filter)	None	
725	Material Recovery Unit 725 (fabric filter)	None	
8	Material Recovery Unit 8 (fabric filter)	None	
5001	Material Recovery Unit 5001	None	
5000	Material Recovery Unit 5000 (fabric filter)	None	
432	Material Recovery Unit 432 (fabric filter)	None	
322	Material Recovery Unit 322	None	
572	Material Recovery Unit 572 (vent from material recovery cyclone in animal feed load-out system)	None	
Plant Heaters			
	Natural gas-fired space heaters	None	

Emissions Inventories

Because this is not a modification to the existing permit in that there is not a physical change in, or change in the method of operation, of this stationary source facility detailed emissions inventories are not required of this project. Therefore, the emissions inventories for this project will be based on the previous permitting project, T2-2008.0109 dated October 8 (based upon T2-030515), 2008, and updated to reflect the replacement of Boiler 2. However, GHG emissions were not previously calculated so they will be included as a result of this project.

Potential to Emit

IDAPA 58.01.01 defines Potential to Emit 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 hours 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 emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the boilers, the natural gas-fired dryers, the material recovery units, the purifiers, the coolers, and the natural gas-fired space heaters operations at the facility (see permitting project, T2-2008.0109 dated October 8, 2008 (based upon T2-030515)) associated with this proposed project. Emissions estimates of GHG were based on emission factors from AP-42, operation of 8,760 hours per year.

Uncontrolled Potential to Emit

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then 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 hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a “Synthetic Minor” source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAPs above the applicable Major Source threshold without permit limits. As the facility classification was previously determined for permitting project, T2-2008.0109 dated October 8, 2008 (based upon T2-030515), the uncontrolled PTE will not be presented for this project.

Pre- and Post Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project. Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility’s classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

This is an existing facility and there are no changes in emissions proposed for this project. Therefore, the emissions calculated for permitting project, T2-2008.0109 dated October 8, 2008 (based upon T2-030515) and updated to reflect the replacement of Boiler 2, will be presented as the pre- and post project PTE. Emissions estimates of GHG were based on emission factors from AP-42 and operation of 8,760 hours per year.

Table 2 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Emissions Unit	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO ^c		VOC		CO ₂ e ^d
	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	T/yr ^b
Point Sources											
Kipper & Sons Boiler	16.3	71.20	48.53	214.00	25.27	110.70	51.34	224.88	2.71	10.97	76,869
Boiler 1	0.39	1.70	0.12	0.54	5.10	22.33	4.28	18.76	0.28	1.23	27,331
Boiler 2	0.37	1.63	0.12	0.51	4.89	21.43	4.11	18.00	0.27	1.18	26,227
Cooler/Dryer 7020	0.41	1.82	0	0	0	0	0	0	0	0	0
Cooler/Dryer 7101	2.16	9.47	0.12	0.51	0.33	1.42	1.69	7.40	0.04	0.15	3,416
Cooler/Dryer 7102	2.16	9.47	0.12	0.51	0.33	1.42	1.69	7.40	0.04	0.15	3,416
Cooler/Dryer 7019	3.39	14.83	0.22	0.96	0.33	1.45	1.72	7.52	0.04	0.16	3,469
Cooler/Dryer 7001	0.23	1.03	0.03	0.11	0	0	0	0	0	0	0
Cooler/Dryer 7027	0.04	0.18	0	0	0	0	0	0	0	0	0
Material Recovery Unit 7006	0.12	0.54	0	0	0	0	0	0	0	0	0
Material Recovery Unit 5034	0.02	0.07	0	0	0	0	0	0	0	0	0
Cooler/Dryer 5037	1.29	5.66	1.87	8.19	0	0	0	0	0	0	0
Cooler/Dryer 4000	1.72	7.53	0.26	1.14	0	0	0	0	0	0	0
Cooler/Dryer 228	1.10	4.80	0.19	0.84	0.48	2.12	2.51	11.00	0.05	0.23	5,077
Cooler/Dryer 234	0.31	1.37	0.06	0.28	0.32	1.41	1.67	7.33	0.03	0.15	3,385
Cooler/Dryer 410/411	0.29	1.28	0.05	0.20	0	0	0	0	0	0	0
Cooler/Dryer 311	0.29	1.28	0.05	0.20	0	0	0	0	0	0	0
Cooler/Dryer 312	0.59	2.57	0.09	0.39	0	0	0	0	0	0	0
Cooler/Dryer 638	1.09	4.80	0.17	0.74	0	0	0	0	0	0	0
Cooler/Dryer 613/614	0.85	3.74	0.13	0.56	0	0	0	0	0	0	0
Cooler/Dryer 615/616	0.24	1.05	0.04	0.16	0	0	0	0	0	0	0
Material Recovery Unit 707	0.00	0.01	0	0	0	0	0	0	0	0	0
Material Recovery Unit 725	0.05	0.21	0	0	0	0	0	0	0	0	0
Material Recovery Unit 8	0.05	0.21	0	0	0	0	0	0	0	0	0
Material Recovery Unit 5001	0.24	1.07	0	0	0	0	0	0	0	0	0
Material Recovery Unit 5000	0.05	0.21	0	0	0	0	0	0	0	0	0
Material Recovery Unit 432	0.05	0.21	0	0	0	0	0	0	0	0	0
Material Recovery Unit 322	0.24	0.00	0	0	0	0	0	0	0	0	0
Material Recovery Unit 572	1.14	0.25	0	0	0	0	0	0	0	0	0
Heaters	0.23	0.50	0.07	0.16	1.54	3.37	8.01	17.54	0.17	0.36	16,188
Pre- and Post Project Totals	35.41	148.69	52.24	230.00	38.59	165.65	77.02	249.00	3.63	14.58	99,000

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
- b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.
- c) CO emissions are required to be less than 249.00 T/yr.
- d) Greenhouse gas emissions are required to be less than 99,000 Tyr.

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

Table 3 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Emissions	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO ₂ e
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	lb/hr	T/yr	lb/hr	lb/hr	T/yr	T/yr
Point Sources											
Pre-Project Potential to Emit	33.41	148.96	52.24	230.00	38.59	165.65	77.02	249.00	3.63	14.58	99,000
Post Project Potential to Emit	33.41	148.96	52.24	230.00	38.59	165.65	77.02	249.00	3.63	14.58	99,000
Changes in Potential to Emit	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Ambient Air Quality Impact Analyses

There was no proposed change in emissions as a result of this project. Therefore, the applicable screening emission levels (EL) and published DEQ modeling thresholds established in IDAPA 58.01.01.585-586 and in the State of Idaho Air Quality Modeling Guideline¹ were not surpassed and modeling was not required for this project.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in [Madison](#) County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

“Synthetic Minor” for AIRS/AFS classification for criteria pollutants is defined as the uncontrolled Potential to Emit for criteria pollutants are above the applicable Title V major source thresholds and the Potential to Emit for criteria pollutants fall below the applicable Title V major source thresholds. Therefore, the following table compares the uncontrolled Potential to Emit and the Potential to Emit for criteria pollutants to the Title V Major Source thresholds to determine if the facility will be “Synthetic Minor.” [As the facility classification was previously determined for permitting project, T2-2008.0109 dated October 8, 2008 \(based upon T2-030515\), and there are no changes in emissions proposed for this project, the uncontrolled PTE will not be presented for this project.](#)

¹ Criteria pollutant thresholds in Table 1, State of Idaho Air Quality Modeling Guideline, Doc ID AQ-011, rev. 1, December 31, 2002.

Table 4 UNCONTROLLED PTE AND PTE FOR REGULATED AIR POLLUTANTS COMPARED TO THE MAJOR SOURCE THRESHOLDS

Pollutant	Uncontrolled PTE (T/yr)	PTE (T/yr)	Major Source Thresholds (T/yr)	Uncontrolled PTE Exceeds the Major Source Threshold and PTE Exceeds the Major Source Threshold?
PM ₁₀ /PM _{2.5}	148.69	148.69	100	Yes
SO ₂	230.00	230.00	100	Yes
NO _x	165.65	165.65	100	Yes
CO	319.83	249.00	100	Yes
VOC	14.58	14.58	100	No
CO _{2e}	165,378	99,000	100,000	No

“Synthetic Minor” classification for HAP pollutants is defined as the uncontrolled Potential to Emit for HAP pollutants are above the applicable Title V major source thresholds and the Potential to Emit for HAP pollutants fall below the applicable major source thresholds. Therefore, the following table compares the uncontrolled Potential to Emit and the Potential to Emit for HAP pollutants to the Major Source thresholds to determine if the facility will be “Synthetic Minor.”

Table 5 UNCONTROLLED PTE AND PTE FOR HAZARDOUS AIR POLLUTANTS COMPARED TO THE MAJOR SOURCE THRESHOLDS

HAP Pollutant	Uncontrolled PTE (T/yr)	PTE (T/yr)	Major Source Thresholds (T/yr)	Uncontrolled PTE Exceeds the Major Source Threshold and PTE Exceeds the Major Source Threshold?
Total HAPs	8.0	8.0	10	No
Total	8.0	8.0	25	No

As demonstrated in Table 4 the facility has an uncontrolled potential to emit for PM₁₀, PM_{2.5}, SO₂, NO_x, and CO exceed the Title V Major Source thresholds and VOC and CO_{2e} emissions are less than the Title V Major Source thresholds of 100 T/yr and 100,000 T/yr respectively. In addition, as demonstrated in Table 5 the facility has an uncontrolled potential for each HAP is less than the Title V Major Source threshold of 10 T/yr and for all HAPs combined less than the Major Source threshold of 25 T/yr. Therefore, this facility is designated as a Title V Major Source for PM₁₀, PM_{2.5}, SO₂, NO_x, and CO emissions and is not designated as a Synthetic Minor facility.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the replacement of the current Tier II permit. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

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

IDAPA 58.01.01.301

Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for [PM₁₀/PM_{2.5}, SO₂, NO_x, and CO](#) as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, this facility is classified as a Title V major facility, as defined in IDAPA 58.01.01.008.10. Therefore, the facility is a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21

Prevention of Significant Deterioration of Air Quality

The facility is not classified as an existing PSD major stationary source, because the estimated emissions of [all criteria pollutants](#) are below the PSD major stationary source thresholds. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a). [The facility is a synthetic minor source with respect to PSD major source purposes because the facility has elected to accept an enforceable limit to keep CO emissions at or below 249 T/y.](#)

NSPS Applicability (40 CFR 60)

Because the facility has [three boilers rated at greater than 10 MMBtu/hr \(but less than 100 MMBtu/hr\)](#) the following NSPS requirement may apply to this facility:

- [40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units](#)

40 CFR 60, Subpart Dc

**Standards of Performance for Small Industrial-
Commercial-Institutional Steam Generating Units**

As stated in the SOB for permit T2-030515, under 40 CFR 60.40b(a), the affected facilities to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. All three of the Rexburg facility boilers meet the size criteria, but Boiler 1 and the Kipper boiler do not meet the date of construction criteria based on the information included in the permit applications and in the file for this facility. However, Boiler 2 was installed after June 9, 1989 and is therefore subject to Subpart Dc. Boiler 2 combusts only natural gas and is therefore subject only to the requirements of 60.48c(g)(2), which requires that the facility record and maintain records of the amount of each fuel combusted during each calendar month, or 60.48c(g)(3), which requires that the facility record the total amount of each steam generating unit fuel delivered to that property during each calendar month.

§ 60.40c

Applicability and Delegation of Authority

Section (a) specifies that except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

(c) Steam generating units that meet the applicability requirements in paragraph (a) of this section are not subject to the sulfur dioxide (SO₂) or particulate matter (PM) emission limits, performance testing requirements, or monitoring requirements under this subpart (§§60.42c, 60.43c, 60.44c, 60.45c, 60.46c, or 60.47c) during periods of combustion research, as defined in §60.41c.

As discussed previously, the Murray boiler is a natural gas-fired boiler rated at between 10 MMBtu/hr and 100 MMBtu/hr and was constructed after June 9, 1989. Therefore, the Murray natural gas fired boilers is subject to some of the requirements of this subpart.

§ 60.41c

Definitions

The definitions of this section apply to the Murray natural gas fired boiler at this facility.

§ 60.48c

Reporting and recordkeeping requirements

Section (a) requires that the owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

These requirements are assured by new Permit Condition 4.5.

Section (g)(1) requires that except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

Section (g)(2) allows as an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

Section (g)(3) allows as an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

These requirements are assured by new Permit Condition 4.6.

Section (i) requires that all records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

These requirements are assured by new Permit Condition 4.7.

NESHAP Applicability (40 CFR 61)

The project is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

The project is not subject to any MACT standards in 40 CFR Part 63.

CAM Applicability (40 CFR 64)

CAM requirements were addressed in the preparation of Tier II Operating Permit and Permit to Construct No. T2-2008.0109. CAM requirements are incorporated into this PTC in Permit Condition 3.13 and Table 3.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

For this permitting action no permit conditions were changed or modified.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.

APPENDIX A – FACILITY DRAFT COMMENTS

The following comments were received from the facility on March 22, 2012:

Facility Comment: Permit page 2 – Please include a table of acronyms, including one for GHG and CO₂e. It is standard practice to include a table of acronyms.

DEQ Response: It is no longer a standard practice of DEQ to include a table of acronyms in the permit, currently it is only included in the Statement of Basis. Therefore, the requested change will not be made to the permit.

Facility Comment: Permit page 2, Section 1.1, second sentence - Please change this to read “The permit incorporates and continues the PTC provisions of Permit No.: T2-2008.0109. The permit also establishes that the Rexburg facility is a synthetic minor facility with respect to greenhouse gas emissions.” BAF did not request or obtain an FEC permit for Rexburg. The proposed language clarifies the scope of this permitting action. BAF is requesting an enforceable limit to keep greenhouse gas emissions below the PSD threshold.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit page 3, Section 1.4, Table 1 – Details have been included in the “Table 1 REGULATED SOURCES document. Boiler 2 is listed as an Erie City Boiler. Boiler 2 is actually a Murray type MCF3-43 boiler with a Coen DAZ burner package (20D-05770-0-001) rated at 49.9 MMBtu. Boiler 2 was changed out in 2010. BAF submitted documentation to DEQ on September 10, 2010 that the change was Category II exempt. The Murray boiler was moved from BAF’s decommissioned facility at Plover, WI. Originally rated at 52.5 MMBtu, the boiler was de-rated for the change in elevation. The Coen Company installed a larger FD fan to partially compensate for the change in elevation and provided documentation that the boiler is now rated for 49.9 MMBtu at Rexburg.

DEQ Response: The equipment details provided by the Applicant will be included in the permit.

Facility Comment: Permit Condition 3.1 - Please add “...and an economizer was added in 2001, increasing the maximum steam production rate to 65,000 lb/hr due to increased boiler efficiency.”

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.6.1 – The sulfur content of the coal used in the Kipper boiler shall not exceed 1.0 % by weight. Please identify this as a PTC Condition referencing: [PTC Letter, 7/30/80].

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.6.1 – Please add “... per any consecutive 12-calendar month period.”

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.7 - Please identify this as a PTC condition as follows: [PTC Condition; 40 CFR 64.6]. This PTC Condition was established as a result of CAM testing conducted by BAF on September 6, 2006. That testing established the range of operating and monitoring conditions that assure compliance with PM emission standards.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.11.4 - Please add “The total amount of heat input to the Kipper boiler while burning wood only shall be determined by multiplying the hourly...” The 72.5% boiler efficiency applies when firing wood only. If coal is co-fired the boiler efficiency increases. See proposed section 3.11.4.2 for language on that situation.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.11.5 (new) - Please add “Prior to combusting coal in the Kipper Boiler, the permittee shall have developed an efficiency factor for the type and source of coal to be combusted. The efficiency factor shall be submitted to DEQ for review and approval prior to combusting coal.” Boiler efficiency will increase when coal is co-fired with wood. The efficiency factor for coal is dependent on a number of source-related factors, including the moisture content of the coal. This permit condition will allow the efficiency factor to be determined when a coal source is identified.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.11.6 (new) - Please add “When coal is co-fired with wood, boiler efficiency shall be determined on a pro-rata basis based on the proportions of wood and coal fired.” This establishes a procedure to calculate boiler efficiency when coal is co-fired with wood.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.13, Table 3 - Please add “An excursion is defined as a boiler steaming rate less than 35,000 lbs/hr or greater than 65,000 lbs/hr on a 24-hour rolling average.” This change provides consistency with the language in permit conditions 3.7.1 and 3.11.1.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.13, including Table 3 - Please identify this as being a PTC condition. These are all CAM provisions that assure compliance with PM emission standards. As such, they should be identified as PTC conditions.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.14 - Please identify this as being a PTC condition. These are all CAM provisions that assure compliance with PM emission standards. As such, they should be identified as PTC conditions.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.15 - Please identify this as being a PTC condition. These are all CAM provisions that assure compliance with PM emission standards. As such, they should be identified as PTC conditions.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.19 - Please identify this as being a PTC condition. These are all CAM provisions that assure compliance with PM emission standards. As such, they should be identified as PTC conditions.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.16 - The questioned reference should be changed to read “...CO Emissions (permit condition 8.3.2).” The emission factor in the current draft Permit Condition 8.3 is used to calculate plant-wide emissions of CO to ensure that the facility remains a minor source for PSD purposes. If the facility chooses to combust a wood/coal mix (rather than just wood), it must conduct the performance test required by Permit Condition 3.16 to verify (validate) the emission factor used in the calculation. The reference to Permit 8.3.2 merely points to the proposed numbering in the word document, “Revised Section 8 with GHG Emissions Limit.”

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 3.17 – Please add “... and Methods 201A and 202 for PM₁₀ emissions. Method 5 may be substituted for Method 201A. Alternatives to these test methods may also be used if use of the alternate test methods is reviewed and approved by DEQ in accordance with General Condition 8. This language directly implements applicable stack test requirements and provides for use of improved or more relevant test methods as appropriate.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 4.3 – Please add “... the burner systems of Boiler 1 (Erie Boiler) and Boiler 2 (Murray Boiler) ...” This is updated boiler information.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 4.4 – Please add “... to measure the quantity of natural gas combusted in Boilers 1 and 2.” To clarify the specific data that is to be maintained.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 4.4 – Please add “The following quantities of natural gas combusted shall be monitored and recorded each calendar month in units of million standard cubic feet (MMscf) per month and MMscf per rolling 12-calendar month period.” This is to maintain internal consistency that the recordkeeping and compliance determination is based on a rolling calendar month determination.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 4.4 – Please add “Each rolling 12-calendar month calculation shall be the summation of the quantities of gas combusted in that calendar month and in each of the preceding 11 calendar months.” General clarification and maintaining internal consistency that record-keeping and compliance determinations are based on rolling 12-month basis.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 5.6 – Please delete “The permittee shall monitor and record, on a daily basis, the calendar date and the total product output of dried food products ~~including additives~~, in tons per day,…” This removes possible ambiguity. This language almost sounds as if additives need to be determined separately. The language isn’t needed since any weighing of the product produced will necessarily include any additives that have been incorporated into the product.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 5.6 – Please add “Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day.” Clarification that a “day” for recordkeeping purposes need not be the same as a calendar day. In fact most daily records are adjusted to the start of the day work shift.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 5.8 – Please add “Alternatives to these test methods may also be used if use of the alternate test methods is reviewed and approved by DEQ in accordance with General Condition 8.”

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 6.6 – Please add “Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day.” Clarification that a “day” for recordkeeping purposes need not be the same as a calendar day. In fact most daily records are adjusted to the start of the day work shift.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 6.7 – Please change to “...the Dryer Process and Material Transfer System PM10 Emissions Limits (Table 8).” The title of the table was correct, but Table 7 does not contain emissions limits.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Condition 8.1 – Please add “The CO emissions from this facility shall not exceed 249 tons per year from aggregated emissions sources, calculated as rolling 12-calendar month total.” This removes ambiguity about the basis for compliance and synchronize the emissions limit with the monitoring and recordkeeping provisions.

DEQ Response: The requested change will be made to the permit.

Facility Comment: Permit Conditions 8.2 and 8.3 – Please add “...12-calendar month...” This synchronizes the monitoring and recordkeeping with the emissions limit.

DEQ Response: The requested change will be made to the permit.

Facility Comment: The carbon monoxide emissions limit Section 8. BAF requests an enforceable limit to keep greenhouse gas emissions below the PSD threshold of 100,000 tons per year. Permit Section 8 is the logical place to insert this language. Insertion, however, changes the numbering. It was easier to prepare a mock-up of this section than to try to describe the changes here.

DEQ Response: Permit Section 8 will be modified to include the greenhouse gas emissions limits as requested.

Facility Comment: Summary of Emissions Limits, Table 9 - Please add a column on the right for CO₂e Emissions and show a Facility-Wide Limit (last row of the table) as 99,000 tons/year.

DEQ Response: The requested change will be made to the permit.

Facility Comment: General Provisions Section - This section currently starts with the number 2, which is very confusing. Please renumber to begin with number 1.

DEQ Response: The requested change will be made to the permit.

Facility Comment: General Provisions Section – Please remove “This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.” This condition was removed from the Tier II permit because it is no longer applicable. All construction is complete.

DEQ Response: This is a General Provision that goes into all Permits to Construct and only affects new construction. Therefore, the requested change will not be made to the permit.

Facility Comment: A general comment: Both the original Tier II operating permit and the draft PTC contain Permit Condition 3.8 that requires, “The permittee shall install, maintain, and operate a multiclone and a wet scrubber on the Kipper boiler...” On 3/12/2008, BAF submitted to Zach Klotovich requested changes regarding the draft Tier II permit. These included the following comment regarding the Riley Ventri-Rod scrubber for the Kipper boiler: “The original design had movable rods which were a maintenance nightmare. Sometime, years ago, the movement controls were removed. Additional rods and spray nozzles were added to enhance particulate capture. It was with these additional rods and sprays that we conducted the CAM tests. Should these changes be noted in this paragraph and the statement of basis?” BAF didn’t receive a response to the question. Nothing was added to the Tier II permit or to the Statement of Basis (SOB) to reflect that the scrubber had been modified. BAF now requests that discussion be added to the SOB reflecting that the scrubber was modified as described above and that the modification preceded the CAM testing on which ongoing compliance with PM standards is based. This will avoid a condition where-in a future inspector might cite BAF for not maintaining the scrubber.

DEQ Response: The requested change will be made to the SOB by adding this discussion to the Application Scope Section.

Facility Comment: Statement of Basis Facility Information – Description Section – Please add the following sentence: “Since the existing T2/PTC was issued, the Erie City boiler that was Boiler 2 has been replaced with a 49.9 MMBTU/hr Murray boiler. This change was exempt from PTC review in accordance with IDAPA 58.01.01.222.02.c.

DEQ Response: The requested change will be made to the SOB by adding this discussion to the Facility Information – Description Section.

Facility Comment: Statement of Basis Facility Information – Description Section – Please add the following “Materials recovery units (primarily cyclones and baghouses) are integral ...” The Rexburg Facility uses both cyclones and baghouses for materials recovery purposes.

DEQ Response: The requested change will be made to the SOB by adding this discussion to the Facility Information – Description Section.

Facility Comment: Statement of Basis Facility Information – Description Section – Please eliminate the fourth paragraph. The fourth paragraph is a repeat of information provided in the second paragraph.

DEQ Response: The requested change will be made to the SOB.

Facility Comment: Statement of Basis Facility Information – Description Section – Please eliminate the “Dehydrated Potato Flakes” section. The Rexburg facility does not manufacture potato flakes.

DEQ Response: Statement of Basis Facility Information – Description Section – Please eliminate all but the last sentence of the paragraph that begins “The Shelley facility...”

Facility Comment: The requested change will be made to the SOB.

DEQ Response: Statement of Basis Facility Information – Description Section – Please eliminate the paragraph that begins “Potato flakes are...”

Facility Comment: The requested change will be made to the SOB.

DEQ Response: Table 1 - The Erie City Boiler 2 was replaced with a Murray boiler. Information on the boiler is presented elsewhere in these comments.

Facility Comment: The requested change will be made to the SOB.

DEQ Response: Statement of Basis Emissions Inventories Section – Please make the following change: “Therefore, the emissions inventories for this project will be based on ~~from~~ the previous permitting project, T2-2008.0109 dated October 8 (based upon T2-030515), 2008, updated to reflect the replacement of Boiler 2. ~~will be presented in the following discussions and tables.~~”

Facility Comment: The requested change will be made to the SOB.

DEQ Response: Statement of Basis Emissions Inventories Section – Include a mention of the boilers in the PTE discussion.

Facility Comment: The requested change will be made to the SOB.

DEQ Response: Statement of Basis Emissions Inventories Section – Please include: “Therefore, the emissions calculated for permitting project, T2-2008.0109 dated October 8, 2008 (based upon T2-030515), and updated to include the replacement of Boiler 2, will be presented as the pre- and post project PTE.”

Facility Comment: Replace Table 2 in its entirety with the new attached Table 2. The replacement table updated to include the replacement of Boiler 2. The replacement table also incorporates revisions and refinements in the facility emission inventory.

DEQ Response: The requested change will be made to SOB Table 2.

Facility Comment: Discussion of Facility Classification (pgs. 11-13), Potential to Emit (PTE), Major Source, and Synthetic Minor. Discussion needs to be re-worked. This section shows some confusion between a Major Facility for Title V purposes (IDAPA 58.01.01.008.10) and Major Source for PSD purposes (40 CFR 52.21). Idaho air rules exacerbate the confusion by using these terms almost interchangeably. The Rexburg facility is most definitely a major facility for Title V purposes, with both potential and actual emissions of several criteria pollutants above 100 tpy (The term synthetic minor does not apply with respect to Title V.). However, the facility is a synthetic minor source for PSD purposes; it has a PTE for CO above the PSD threshold of 250 tpy, but has elected to accept a state and federally enforceable limit to keep CO emissions at or below 249 tpy per permit condition 8.1.1. The calculation given in Permit Condition 8.3 is the calculation of CO emissions on a rolling 12-month basis to verify that CO emissions don't exceed 249 tpy.

DEQ Response: The discussions of Title V major source and PSD major source will be clarified.

Facility Comment: Statement of Basis Emissions Inventories Section – Please update Table 3 – Changes in Potential to Emit for Regulated Air Pollutants. The replacement table updated to include the replacement of Boiler 2. The replacement table also incorporates revisions and refinements in the facility emission inventory.

DEQ Response: The requested change will be made to SOB Table 3.

Facility Comment: Statement of Basis Emissions Inventories Section –Table 4 - Column 5 shows that the uncontrolled PTEs of all criteria pollutants except VOCs exceed Major Source Thresholds. Please define whether this table refers to IDAPA 58.01.01.008.10 (Major Facility for Title V purposes) or to 40 CFR 52.21 (Major Source for PSD purposes). If the table refers to 40 CFR 52.21, please change all yeses to noes except for CO (CO should remain a ‘Yes.’). The table does not state which regulation it refers to. The facility is a Major Facility with respect to Title V. It is a Synthetic Minor with respect to PSD because it has a PTE for CO above the Major Source Threshold of 250 tpy, but has elected to accept and enforceable limit to keep CO emissions at or below 249 tpy. Presumably, this table is intended to show that an enforceable limit is appropriate. Thus, we presume it refers to 40 CFR 52.21. If so, only CO has a PTE to exceed the threshold.

DEQ Response: As discussed previously, the discussions of Title V major source and PSD major source will be clarified.

Facility Comment: Statement of Basis Title V Classification Section – States that the facility both IS and IS NOT a major facility with respect to IDAPA 58.01.01.008.10. The facility IS a major facility with respect to IDAPA 58.10.01.008.10 and the requirements of IDAPA 58.01.01.301 DO apply.

DEQ Response: This discussion will be clarified as requested.

Facility Comment: Statement of Basis PSD Classification Section – Please change to read, “The facility is a synthetic minor source with respect to 40 CFR 52.21 because the facility has elected to accept an enforceable limit to keep CO emissions at or below 249 tpy.

DEQ Response: The requested change will be made to the SOB.

Facility Comment: Statement of Basis NSPS Applicability Section – Please include the following: “Under 40 CFR 60.40c(a), the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal 10 MMBtu/hr. All three of the Rexburg facility boilers meet the size criteria, but Boiler 1 and the Kipper boiler do not meet the date of construction criteria based on the information included in the permit applications and in the file for this facility. Only Boiler 2 was modified after June 9, 1989 and is therefore subject to Subpart Dc. However, Boiler 2 combusts only natural gas and is therefore subject only to the requirements of 60.48c(g)(2), which requires that the facility record and maintain records of the amount of each fuel combusted during each calendar month, or 60.48c(g)(3), which requires that the facility record the total amount of each steam generating unit fuel delivered to that property during each calendar month.

DEQ Response: The requested change will be made to the SOB. In addition, new Permit Conditions 4.5, 4.6, and 4.7 will added to the permit to incorporate these NSPS requirements.

Facility Comment: Statement of Basis NESHAP Applicability Section – Please change to “The project is not subject to ...” Consistency of language with permitting scope. It is this project that is not subject to NESHAP. The facility itself, though, is subject to NESHAP – e.g., the asbestos NESHAP is applicable to the facility but applicability of the asbestos NESHAP is not within the scope of this permitting action

DEQ Response: The requested change will be made to the SOB.

Facility Comment: Statement of Basis CAM Applicability Section – Please insert the following: “**CAM Applicability (40 CFR 64)** CAM requirements were addressed in the preparation of Tier II Operating Permit and Permit to Construct No. T2-2008.0109. CAM requirements are incorporated into this PTC in Permit Condition 3.13 and Table 3.

APPENDIX B – PROCESSING FEE