

AIR QUALITY

PERMIT TO CONSTRUCT

Permittee McCain Foods
Permit Number P-2012.0043
Project ID 61312
Facility ID 031-00014
Facility Location 218 West Highway 30
Burley, Idaho 83318

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200-228, (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200-228.

Date Issued April 25, 2014



Kelli Wetzel, Permit Writer



Mike Simon, Stationary Source Manager

Contents

1	Permit Scope.....	3
2	Facility-Wide Conditions.....	4
3	Boilers and Biogas Flare.....	7
4	Dryers	10
5	Fryers	12
6	Batter Room.....	14
7	Emergency Fire Pump	15
8	National Emission Standards for Stationary Reciprocating Internal Combustion Engines ..	16
9	Summary of Emission Rate Limits.....	22
10	General Provisions.....	23

1 Permit Scope

Purpose

- 1.1 This is a modified permit to construct (PTC) to reconfigure the Burley Plant 2 (B2) Prime 2 dryer and fryer line and remove the existing steam-heated Parfry fryer. [April 25, 2014]
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2012.0043, issued on August 16, 2012. [April 25, 2014]

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Facility-wide (fugitive and point sources)	Reasonable Control
3	(B101)Murray 1 boiler, model: mcf4-78, 100 MMBtu/hr, natural gas and biogas (B102) Nebraska 1 boiler, Model: NS-E-68, 95.58 MMBtu/hr, natural gas and biogas (B202) Nebraska 2 boiler, Model: NS-E-57, 78.05 MMBtu/hr, natural gas (B203) Murray 2 boiler, Model: MCF2-38, 39.1 MMBtu/hr, natural gas (C001) Biogas flare, Varec, Model: 244W	None
4	(D109 - D111) Prime 1 dryer, Wolverine Proctor, steam heated (D107) Tot dryer, Rey Industries, 4 MMBtu/hr, direct-fired dryer, natural gas (D209- D211) Prime 2 dryer, National, steam heated	None
5	(F103) Tot fryer, Shockey Model: Ore-Ida (F104) Prime 1 fryer, Shockey Model: Ore-Ida (F204) Prime 2 fryer, heat and control	Air washer, Rey Industries Air washer, Ore-Ida Air washer, Ore-Ida
6	(E209) Batter Room collector	Dust collector
7	(E001) Emergency fire pump, Detroit Diesel Model: 6061-A2, No. 1 or No. 2 fuel oil	None
8	<u>NESHAP Requirements</u> Fire Pump Engine, 170 Horsepower, Diesel Fuel, Compression Ignition 3-Emergency Generators, Two at 30 Horsepower and one at 25 kW, Natural Gas, Spark Ignition	None

[April 25, 2014]

2 Facility-Wide Conditions

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

- 2.5 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.
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 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, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Open Burning

- 2.9 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.

Reports and Certifications

- 2.10 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Twin Falls Regional Office
Department of Environmental Quality
650 West Addison Ave. West, Suite 110
Twin Falls, ID 83301
Phone: (208) 736-2190
Fax: (208) 736-2194

[April 25, 2014]

Obligation to Comply

- 2.11 Receiving a permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

Fuel-burning Equipment

2.12 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas.

Air Pollution Emergency Rule

2.13 The permittee shall comply with the Air Pollution Emergency Rule, in accordance with IDAPA 58.01.01.550-562.

3 Boilers and Biogas Flare

3.1 Process Description

There are four boilers existing at the facility, and they are used to generate steam for the manufacturing process. Two of the units, the Murray 1 boiler and the Nebraska 1 boiler, are located in Burley Plant 1. The Murray 1 boiler has a maximum heat input capacity of 100 MMBtu/hr. The Nebraska 1 boiler has a maximum heat input capacity of 95.58 MMBtu/hr. The Murray 1 boiler and Nebraska 1 boiler combust both natural gas as primary fuel and biogas as secondary fuel. The remaining two boilers, the Nebraska 2 boiler and the Murray 2 boiler, are located in Burley Plant 2. The Nebraska 2 boiler has a maximum heat input capacity of 78.05 MMBtu/hr. The Murray 2 boiler has a maximum heat input capacity of 39.1 MMBtu/hr. The Murray 2 boiler and Nebraska 2 boiler combust only natural gas as fuel.

The biogas flare incinerates the gases created in McCain Foods' anaerobic lagoon. The flare is a Varec Model 244W Series.

3.2 Control Device Descriptions

Emissions from all of the boilers are uncontrolled.

Table 3.1 Boilers and Biogas Flare Description

Emissions Units / Processes	Control Devices	Emission Points
Murray 1 Boiler	None	B101
Nebraska 1 Boiler	None	B102
Nebraska 2 Boiler	None	B202
Murray 2 Boiler	None	B203
Biogas Flare	None	C001

Emission Limits

3.3 Emission Limits

- The aggregate PM10, NOx, CO, and VOC emissions from the boiler stacks (B101, B102, B202, B203) shall not exceed any corresponding emissions rate limits listed in Section 9 of this permit.
- The aggregate SO2 emissions from the boiler stacks (B101, B102, B202, and B203) and the biogas flare (C001) shall not exceed 99.86 tons per any consecutive 12-month period (T/yr).
- Emissions of H₂S from the boiler stacks (B101 and B102) and the biogas flare (C001) shall not exceed 6.0 lb/day.
- Emissions of H₂S from the boiler stacks (B101 and B102) and the biogas flare (C001) shall not exceed 1.1 T/yr.

3.4 Biogas Flare Particulate Matter Emissions Limit

Particulate matter (PM) emissions from the biogas flare shall not exceed 0.2 pounds per 100 pounds of biogas burned, as required by IDAPA 58.01.01.785.

Operating Requirements

3.5 Requirements for Biogas Flare and Combustion of Anaerobic Lagoon Emissions

The permittee shall maintain and operate a biogas flare for the combustion of the biogas emitted from the anaerobic lagoon. All emissions of air pollutants from the anaerobic lagoon shall be combusted in either boilers (B101 or B102) or the biogas flare.

3.6 Pilot Flame and Alarm

The flare shall be operated with a pilot flame present during the operation of the digester. In the event of a flame failure, the permittee shall follow a standard operating procedure to reinitiate the pilot flame as expeditiously as practicable.

The permittee shall periodically calibrate and shall operate at all times when the flare is operating a hot wire anemometer or similar device that detects the presence of a flame in the biogas flare. In addition, the permittee shall maintain an alarm that notifies the operator in the case of a flameout. The permittee shall follow the excess emissions procedures in IDAPA 58.01.01.130-136 and in General Provision 10.11 of this permit in the event of an excess emissions event caused by the biogas flare.

3.7 Natural Gas Fuel Usage Limit

The maximum amount of natural gas combusted by the four boilers collectively shall not exceed 1,100 MMscf/yr for any consecutive 12-month period.

3.8 Natural Gas Fuel Meter

The permittee shall calibrate, maintain, and operate a natural-gas flow meter to measure the amount of natural gas combusted in the boilers (B101, B102, B202, B203) collectively.

3.9 Fuel Type

- The Murray 1 boiler and Nebraska 1 boiler, with a maximum combined total rated heat input capacity of 196 MMBtu/hr, shall be fueled with either natural gas or a mixture of biogas and natural gas exclusively.
- The Murray 2 boiler and Nebraska 2 boiler, with a maximum combined total rated heat input capacity of 117 MMBtu/hr, shall be fueled on natural gas exclusively.

[April 25, 2014]

Monitoring and Recordkeeping Requirements

3.10 Natural Gas and Fuel Usage Monitoring Requirement

The permittee shall monitor and record the amount of natural gas combusted by the boilers, collectively, daily, monthly, and annually to demonstrate compliance with Permit Condition 3.7. The amount of natural gas combusted shall be recorded in units of standard cubic feet. Each daily amount of natural gas combusted shall be summed monthly, and then each month's amount of natural gas combusted shall be summed over the previous consecutive 12-month period.

3.11 Biogas Flow Rate and H₂S Concentration Monitoring

Unless an alternative monitoring and recordkeeping method is approved by DEQ, the permittee shall comply with the following requirements:

Biogas H₂S Concentrations

The permittee shall perform the following to determine the quantity of hydrogen sulfide (H₂S) produced by the anaerobic lagoon:

- The permittee shall install, calibrate, maintain, and operate an H₂S gas monitor that shall be placed upstream of boilers (B101 and B102) and the biogas flare to measure the H₂S concentrations in the biogas produced by the anaerobic lagoon. The monitor shall be installed in accordance with the O&M manual and the manufacturer specifications.
- Calibration of the H₂S monitor shall be performed and recorded semi-annually.
- The results of the H₂S concentrations from the H₂S monitor shall be recorded once per week.

Biogas Flow Rate Monitoring

The permittee shall calibrate and operate a biogas flow meter that shall be placed after the outlet of the covered anaerobic lagoon to determine the quantity of biogas produced by the lagoon. The permittee shall monitor and record the total biogas flow rate on a weekly basis.

H₂S and SO₂ Emission Estimates

The permittee shall estimate H₂S and SO₂ emissions according to the following methods:

- The monthly SO₂ emissions and H₂S emissions from the flare and the boilers (B101 and B102) shall be calculated using the average H₂S concentration readings of all H₂S samples taken for each week, and the corresponding weekly biogas flow. The calculations shall be conducted using a similar method as in the permit application, including a molar conversion of H₂S to SO₂, a 98% H₂S control efficiency and 98% conversion of H₂S to SO₂ for the flare; and, a 98% H₂S control efficiency, and a 98% conversion of H₂S to SO₂ emissions for the boilers (B101 and B102).
- Monthly SO₂ emissions shall be used to determine rolling 12-month total SO₂ emissions.
- Monthly H₂S emissions shall be used to determine the rolling 12-month H₂S emissions.

3.12 Operations and Maintenance Manual

The permittee shall maintain an operations and maintenance (O&M) manual which describes the procedures that will be followed to maintain the anaerobic lagoon in good working order and assure operation as efficiently as practical for the H₂S monitor and the pilot flame detector. The procedures and specifications described in the O&M manual shall address, at a minimum, the following topics:

H₂S Monitor

- Standard operational procedure for H₂S sampling
- Frequency and method of calibration
- Operational maintenance
- Procedures for upset/breakdown conditions and for correcting equipment malfunction

Pilot Flame Detector

- Method of ensuring continuous operation
- Operational maintenance

4 Dryers

4.1 Process Description

McCain Foods currently operates two process lines for Prime Products, one in each plant. Dryers are utilized to reduce the moisture content of potato products prior to frying. The two dryers that are operated in conjunction with the Prime Products lines are as follows: the Prime 1 dryer is steam heated (Burley Plant 1) and the Prime 2 dryer (Burley Plant 2) is steam heated. The Prime 1 dryer vents directly to the atmosphere via three separate stacks (D109 - D111). The Prime 2 dryer vents to the atmosphere through three separate stacks (D209 - D211). Tater Tots are manufactured in Burley Plant 1. The Tot dryer is a direct, natural gas-fired dryer that removes moisture from the potatoes. The Tot dryer vents directly to the atmosphere via a vertical stack (D107).

[April 25, 2014]

4.2 Control Device Descriptions

Emissions from the Prime Product dryers are uncontrolled.

Table 4.1 Prime Product Dryers Description

Emissions Units / Processes	Control Devices	Emission Points
Prime 1 dryer	None	D109, D110, D111
Prime 2 dryer	None	D209, D210, D211
Tot dryer	None	D107

[April 25, 2014]

Emission Limits

4.3 Emission Limits

Particulate matter, PM₁₀, SO₂, NO_x, CO, and VOC emissions from the dryer stacks (D109 - D111, D209, D210, D211, and D107) shall not exceed any corresponding emissions rate limits listed in the Section 9 of this permit.

[April 25, 2014]

Operating Requirements

4.4 Throughput Limits

Prime 1 Dryer

- The maximum throughput of the Prime 1 dryer shall not exceed 642 T/day of finished potato product based on a monthly average.
- The maximum annual throughput of the Prime 1 dryer shall not exceed 173,340 tons of finished potato product per any consecutive 12-month period.

Prime 2 Dryer

- The maximum throughput of the Prime 2 dryer shall not exceed 540 T/day of finished potato product based on a monthly average.
- The maximum annual throughput of the Prime 2 dryer shall not exceed 145,800 tons of finished potato product per any consecutive 12-month period.

Tot Dryer

- The maximum throughput of the Tot dryer shall not exceed 192 T/day of finished potato product based on a monthly average.
- The maximum annual throughput of the Tot dryer shall not exceed 51,840 tons of finished potato product per any consecutive 12-month period.

4.5 Fuel Usage Limits

The maximum amount of natural gas combusted in the Tot dryer shall not exceed 30 MMscf, or 306,000 therms, per any consecutive 12-month period.

[April 25, 2014]

4.6 Fuel Meter

The permittee shall calibrate, maintain, and operate a natural-gas flow meter to measure the amount of natural gas combusted in the Tot dryer.

[April 25, 2014]

4.7 Fuel Type

The Tot dryer shall be fueled on natural gas exclusively.

[April 25, 2014]

Monitoring and Recordkeeping Requirements

4.8 Throughput Monitoring

The permittee shall monitor and record the finished potato product throughput of the Prime 1 dryer, the Prime 2 dryer, and the Tot dryer daily, monthly, and annually to demonstrate compliance with Permit Condition 4.4. Throughput shall be measured at the packaging step of each process line, and "day" shall mean a 24-hour period. The throughput of each dryer shall be monitored and recorded daily. The daily throughputs of each dryer shall be summed and recorded monthly. The monthly throughputs of each dryer shall be summed and recorded for the previous consecutive 12-month period.

4.9 Fuel Usage Monitoring Requirement – Tot Dryer

The permittee shall monitor and record the amount of natural gas combusted by the Tot dryer daily, monthly, and annually to demonstrate compliance with Permit Condition 4.5. The amount of natural gas combusted shall be recorded in units of standard cubic feet or therms. Each daily amount of natural gas combusted shall be summed monthly, and then each month's amount of natural gas combusted shall be summed over the previous consecutive 12-month period.

[April 25, 2014]

5 Fryers

5.1 Process Description

After being dried, the potato products are conveyed to the fryers in which they are cooked in hot vegetable oil. The two fryers used for Prime Products are as follows: Prime 1 fryer (Burley Plant 1) and the Prime 2 fryer (Burley Plant 2). The fryers are heated by steam. Each fryer is equipped with an air washer that is essentially a spray-chamber scrubber. In the air washer, exhaust from the fryer is passed through a chamber and contacted with a water spray that saturates the air stream. This allows the PM to attach to the water droplets. The water droplets carrying the PM are separated from the exhaust stream by a bank of stainless steel eliminator blades. The Prime 1 fryer air washer vents to the atmosphere through a single vertical stack (F104). The Prime 2 fryer air washer vents to the atmosphere through a single vertical stack (F204). The tots are conveyed to the Tot fryer where they are cooked in hot vegetable oil. The fryer is heated by steam. The fryer is equipped with an air washer that removes PM from the exhaust stream. The Tot fryer air washer vents to the atmosphere through a single vertical stack (F103).

[April 25, 2014]

5.2 Control Device Descriptions

Table 5.1 Prime Fryers Description

Emissions Units / Processes	Control Devices	Emission Points
Prime 1 fryer	Air washer	F104
Prime 2 fryer	Air washer	F204
Tot fryer	Air washer	F103

[April 25, 2014]

Emission Limits

5.3 Emission Limits

Particulate matter, PM₁₀, and VOC emissions from the fryer stacks (F104, F204, F103) shall not exceed any corresponding emissions rate limits listed in Section 9 of this permit.

[April 25, 2014]

Operating Requirements

5.4 Throughput Limits

Prime 1 Fryer

- The maximum throughput of finished potato product for the Prime 1 fryer shall not exceed 642 T/day based on a monthly average.
- The maximum throughput of finished potato product for the Prime 1 fryer shall not exceed 173,340 tons per any consecutive 12-month period.

Prime 2 Fryer

- The maximum throughput of finished potato product for the Prime 2 fryer shall not exceed 540 T/day based on a monthly average.
- The maximum throughput of finished potato product for the Prime 2 fryer shall not exceed 145,800 tons per any consecutive 12-month period.

Tot Fryer

- The maximum throughput of finished potato product for the Tot fryer shall not exceed 192 T/day based on a monthly average.
- The maximum throughput of finished potato product for the Tot fryer shall not exceed 51,840 tons per any consecutive 12-month period.

[April 25, 2014]

5.5 Air Pollution Control Equipment

The fan and the spray-water pump associated with each air washer shall be operated per the instructions provided in the O&M manual. The pressure at the header of the air washer shall also be set per the specifications identified in the O&M manual by adjusting the pump discharge valve. The spray-water pump pressure must be maintained within the range specified in the O&M manual.

The air-washer system shall be maintained on a routine basis in accordance with the schedule recommended in the O&M manual. Maintenance activities shall include, but not be limited to, the following: cleaning and replacing the spray-water nozzles, pressure pump maintenance, and cleaning the eliminator blades.

[April 25, 2014]

Monitoring and Recordkeeping Requirements

5.6 Throughput Monitoring

The permittee shall monitor and record the finished potato product throughput of the Prime 1 fryer, the Prime 2 fryer, and the Tot fryer, daily, monthly, and annually to demonstrate compliance with Permit Condition 5.4. Throughput shall be measured at the packaging step of each process line, and "day" shall mean a 24-hour period. The throughput of each fryer shall be monitored and recorded daily. The daily throughputs of each fryer shall be summed and recorded monthly. The monthly throughputs of each fryer shall be summed and recorded for the previous consecutive 12-month period.

[April 25, 2014]

5.7 Air Pollution Control Parameters

The permittee shall monitor and record the parameters listed below to demonstrate compliance with air pollution control equipment requirements for Prime 1 fryer air washer, Prime 2 fryer air washer, and the Tot fryer air washer.

Air-washer fan is operable. Verify once daily and record status.

Spray-water pump is operable. Verify once daily and record status.

Spray-water pump pressure. Measure once daily and record pressure.

Maintenance activities. Record date and description.

[April 25, 2014]

5.8 Operations and Maintenance Manual

The permittee shall have an O&M manual for the fryer air washers (air pollution control devices). The O&M manual shall describe the procedures that will be followed to insure proper operation of the fryer air washers.

6 Batter Room

6.1 Process Description

Several of the potato products are battered. The batter is prepared from various dry ingredients, such as flour and seasonings, in a designated room located in Burley Plant 2. Particulate matter is filtered from the air in the Batter Room by a dust-collection system.

6.2 Control Device Descriptions

Emissions from the Batter Room are controlled by a package baghouse unit that consists of a group of filter elements that are mounted in an airbox. Exhaust from the dust-collection system is vented to the atmosphere via a horizontal duct (E209).

Table 6.1 Batter Room Description

Emissions Units / Processes	Control Devices	Emission Points
Batter Room	Dust Collector (baghouse)	E209

Emission Limits

6.3 Emission Limits

The PM₁₀ emissions from the Batter Room stack shall not exceed any corresponding emissions rate limits listed in Section 9 of this permit.

[April 25, 2014]

Operating Requirements

6.4 Baghouse

The permittee shall inspect the Batter Room dust-collector filters once per month for tears and holes. The filters shall be replaced as needed.

[April 25, 2014]

Monitoring and Recordkeeping Requirements

6.5 Baghouse

The filter status of the Batter Room dust-collector filters shall be recorded upon inspection.

[April 25, 2014]

7 Emergency Fire Pump

7.1 Process Description

A diesel fire pump is utilized to create water pressure for emergency fire-fighting efforts. The 170-horsepower pump is connected to the Snake River and is located in a small building north of Burley Plant 1. In addition to emergency situations, the emergency fire pump is operated once a week for approximately two hours to insure that the unit is functioning properly. The exhaust is discharged to the atmosphere by means of a horizontal stack (E001) located on the north side of the fire pump house.

7.2 Control Device Descriptions

Emissions from the emergency fire pump are uncontrolled.

Table 7.1 Emergency Fire Pump Description

Emissions Units / Processes	Control Devices	Emission Points
Emergency fire pump	None	E001

Emission Limits

7.3 Emission Limits

Particulate matter, PM₁₀, SO₂, NO_x, CO, and VOC emissions from the emergency fire pump stack (E001) shall not exceed any corresponding emissions rate limits listed in this permit.

Operating Requirements

7.4 Hours of Operation

The total number of hours of operation for the emergency fire pump shall not exceed 104 hours for any consecutive 12-month period, except during an emergency.

[April 25, 2014]

7.5 Fuel Specification

The emergency fire pump shall be fired exclusively by distillate fuel oil exclusively.

7.6 Distillate Fuel Oil Sulfur Content Limit

- The sulfur content of ASTM Grade 1 fuel oil shall not exceed 0.3% by weight.
- The sulfur content of ASTM Grade 2 fuel oil shall not exceed 0.5% by weight.

Monitoring and Recordkeeping Requirements

7.7 Hours of Operation Monitoring Requirement

The permittee shall monitor and record the date and the number of hours of operation of the emergency fire pump to demonstrate compliance with Permit Condition 7.4.

7.8 Fuel Oil Sulfur Content Monitoring Requirement

The permittee shall demonstrate compliance with Permit Condition 7.6 by obtaining documentation of the sulfur content analysis for each shipment of distillate fuel oil (ASTM Grade 1 fuel oil and ASTM Grade 2 fuel oil) on an as-received basis.

8 National Emission Standards for Stationary Reciprocating Internal Combustion Engines

8.1 Process Description

The facility uses 4 reciprocating internal combustion engines that are subject to 40 CFR 63 Subpart ZZZZ.

Table 8.1 Internal Combustion Engines Description

Emissions Units / Processes	Control Devices
Fire Pump Engine 170 Horsepower Diesel Fuel Compression Ignition	None
3- Emergency Generators 2 at 30 hp each, 1 at 25 kW Natural Gas Spark Ignition	None

8.2 § 63.6595 When do I have to comply with this subpart?

In accordance with 40 CFR 63.6595:

- The compression ignition fire pump engine must comply with the applicable emission limitations and operating limitations no later than May 3, 2013.
- The spark ignition emergency generators must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

8.3 § 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?

In accordance with 40 CFR 63.6603 and Table 2d to Subpart ZZZZ the compression ignition fire pump engine must comply with the following requirements:

- Change oil and filter every 500 hours of operation or annually, whichever comes first;
- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

In accordance with 40 CFR 63.6603 and Table 2d to Subpart ZZZZ the spark ignition emergency engines must comply with the following requirements:

- Change 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 all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

8.4 § 63.6605 What are my general requirements for complying with this subpart?

In accordance with 40 CFR 63.6605(a) the permittee must be in compliance with the operating limitations in this subpart that apply to you at all times.

In accordance with 40 CFR 63.6605(b) At all times the permittee 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.

8.5 § 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?

In accordance with 40 CFR 63.6625(e) the reciprocating internal combustion engines (RICE) must be operated and maintained according to the manufacturer's emission-related written instructions or the permittee may develop it's 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.

In accordance with 40 CFR 63.6625(f) the permittee must install a non-resettable hour meter on the RICE if they are not already installed.

In accordance with 40 CFR 63.6625(i)&(j) the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2d to this subpart.

8.6 § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?

In accordance with 40 CFR 63.6635 the permittee shall monitor continuously at all times that the stationary RICE is operating.

8.7 § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?

In accordance with 40 CFR 63.6640(a) and Table 6 to this subpart the permittee shall comply by operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow 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.

In accordance with 40 CFR 63.6640(b) You must report each instance in which you did not meet each operating limitation in Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650.

In accordance with 40 CFR 63.6640(f) (1) you must operate the emergency stationary RICE according to the requirements listed below. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If you do not operate the engine according to the requirements listed below, 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.

8.8 § 63.6655 What records must I keep?

In accordance with 40 CFR 63.6655(a) the permittee must keep the following records:

- A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).
- Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.
- Records of all required maintenance performed on the air pollution control and monitoring equipment.
- Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

In accordance with 40 CFR 63.6655(d) the permittee must keep the records required in Table 6 of this subpart to show continuous compliance with each operating limitation that applies. Table 6 requires operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or developing and following 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.

In accordance with 40 CFR 63.6655(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.

In accordance with 40 CFR 63.6655(f) for RICE that do not meet the standards applicable to non-emergency engines 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.

8.9 § 63.6660 In what form and how long must I keep my records?

In accordance with 40 CFR 63.6660:

- (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).

8.10 NESHAP 40 CFR 63, Subpart A – General Provisions

The permittee shall comply with the requirements of 40 CFR 63, Subpart A – General Provisions. A summary of applicable requirements for affected sources is provided in Table 8.2.

Table 8.2 Internal Combustion Engines Description

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.1	General applicability of the General Provisions	Yes.	
§63.2	Definitions	Yes	Additional terms defined in §63.6675.
§63.3	Units and abbreviations	Yes.	
§63.4	Prohibited activities and circumvention	Yes.	
§63.5	Construction and reconstruction	Yes.	
§63.6(a)	Applicability	Yes.	
§63.6(b)(1)–(4)	Compliance dates for new and reconstructed sources	Yes.	
§63.6(b)(5)	Notification	Yes.	
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Compliance dates for new and reconstructed area sources that become major sources	Yes.	
§63.6(c)(1)–(2)	Compliance dates for existing sources	Yes.	
§63.6(c)(5)	Compliance dates for existing area sources that become major sources	Yes.	
§63.6(d)	[Reserved]		

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.6(f)(2)	Methods for determining compliance	Yes.	
§63.6(f)(3)	Finding of compliance	Yes.	
§63.6(g)(1)-(3)	Use of alternate standard	Yes.	
§63.6(i)	Compliance extension procedures and criteria	Yes.	
§63.6(j)	Presidential compliance exemption	Yes.	
§63.9(a)	Applicability and State delegation of notification requirements	Yes.	
§63.9(b)(1)-(5)	Initial notifications	Yes	Except that §63.9(b)(3) is reserved.
		Except that §63.9(b) only applies as specified in §63.6645.	
§63.9(c)	Request for compliance extension	Yes	Except that §63.9(c) only applies as specified in §63.6645.
§63.9(d)	Notification of special compliance requirements for new sources	Yes	Except that §63.9(d) only applies as specified in §63.6645.
§63.9(h)(1)-(6)	Notification of compliance status	Yes	Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. §63.9(h)(4) is reserved.
			Except that §63.9(h) only applies as specified in §63.6645.
§63.9(i)	Adjustment of submittal deadlines	Yes.	
§63.9(j)	Change in previous information	Yes.	
§63.10(a)	Administrative provisions for recordkeeping/reporting	Yes.	
§63.10(b)(1)	Record retention	Yes.	
§63.10(b)(2)(vi)-(xi)	Records	Yes.	
§63.10(b)(2)(xii)	Record when under waiver	Yes.	
§63.10(b)(2)(xiv)	Records of supporting documentation	Yes.	
§63.10(b)(3)	Records of applicability determination	Yes.	
§63.10(d)(1)	General reporting requirements	Yes.	
§63.10(d)(4)	Progress reports	Yes.	
§63.10(f)	Waiver for recordkeeping/reporting	Yes.	
§63.12	State authority and delegations	Yes.	
§63.13	Addresses	Yes.	Director Air and Waste US EPA 1200 Sixth Avenue Seattle, WA 98101
§63.14	Incorporation by reference	Yes.	
§63.15	Availability of information	Yes.	

8.11 Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

9 Summary of Emission Rate Limits

The following table provides the emission rate limits for specific sources regulated in this permit:

Table 9.1 Emission Rate Limits

McCain Foods, Burley										
Emission Limits ^a – Hourly ^b (lb/hr), and Annually ^c (T/yr)										
Source Description	PM ₁₀ ^d		NOx		CO		VOC		SO ₂	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
(B101) Murray 1 boiler	0.75	4.88		64.16		53.90		3.53		99.86
(B102) Nebraska 1 boiler	0.71									
(B202) Nebraska 2 boiler	0.58									
(B203) Murray 2 boiler	0.29									
(C001) Biogas Flare	0.16									
(D109, D110, D111) Prime 1 dryer	6.69	21.67								
(D107) Tot dryer	2.00	6.48		2.30		5.60		0.08		0.01
(D209 – D211) Prime 2 dryer	5.54	17.93								
(F103) Tot fryer	4.08	13.22								
(F104) Prime 1 fryer	2.68	8.67								
(F204) Prime 2 fryer	2.25	7.29								
(E209) Batter Room collector	0.12	0.53								
(E001) Emergency fire pump	0.37	0.02		0.27		0.06		0.02		0.02

- a As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.
- b Hourly limits are a 24-hour average.
- c As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.
- d Includes condensibles.

[April 25, 2014]

10 General Provisions

General Compliance

10.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)

[Idaho Code §39-101, et seq.]

10.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

10.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

10.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 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]

Construction and Operation Notification

10.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

10.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 10.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 10.8 All performance 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, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 10.9 Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 10.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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 58.01.01.211, 5/1/94]

Excess Emissions

- 10.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

10.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10.13 No person shall knowingly 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]

Tampering

10.14 No person shall knowingly 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]

Transferability

10.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

10.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]