

Statement of Basis

**Permit to Construct No. P-2012.0043
Project ID 61312**

**McCain Foods
Burley, Idaho**

Facility ID 031-00014

Final

April 25, 2014
Kelli Wetzel
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
Btu	British thermal units
CAA	Clean Air Act
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
DEQ	Department of Environmental Quality
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gpm	gallons per minute
HAP	hazardous air pollutants
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
km	kilometers
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
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 ₂	oxygen
PAH	polyaromatic hydrocarbons
PC	permit condition
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
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
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
U.S.C.	United States Code
VOC	volatile organic compounds
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

McCain Foods USA, Inc. is a processing facility that produces frozen potato products such as french fries and tater tots for retail and institutional distribution. The facility, which is located in Burley, Idaho, is comprised of two plants: Burley Plant 1 and Burley Plant 2. The plants were constructed in the late 1950s to early 1960s. Originally, the plants were owned and operated by separate companies (Ore-Ida Foods, Inc. and Idaho Potato Processors, Inc.). The two plants were combined under the common ownership of Ore-Ida Foods in 1965. McCain Foods acquired the facility on July 1, 1997.

The emissions from McCain Foods are generated by four boilers, three dryers, three fryers, a dust collection system, emergency fire pump, three emergency generators, and an anaerobic lagoon biogas flare.

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).

August 19, 1982	PTC 0440-0014, Permit Status (S)
June 25, 1985	PTC No. 0440-0014, Nebraska Boiler, Issued to Ore-Ida Foods, Permit status (S)
November 7, 2002	T2/PTC No. 031-00014, McCain Foods, Facility Wide Permit, Permit status (S)
April 7, 2004	P-030423, McCain Foods, Biogas Flare, Permit status (S)
December 27, 2005	T2-050423 McCain Foods, Revision of Permit issued December 7, 2002 ¹ for steam heated dryers (S)
July 28, 2006	P-060405, McCain Foods, Revision of Permit issued December 7, 2002 ¹ to combust biogas in boilers (S)
February 25, 2008	T2/PTC No. T2-2007.0233, McCain Foods, Renewed T2 operating permit (S)
August 16, 2012	P-2012.0043, Project 61085, McCain Foods, Converted T2/PTC to a PTC and incorporated the requirements of 40 CFR 63 Subpart ZZZZ (A, but will be superseded by this permit action)

Application Scope

This PTC is for a minor modification at an existing minor facility.

The applicant has proposed to:

- Reconfigure the Burley Plant 2 (B2) Prime 2 dryer and fryer line. The dryer and fryer will be replaced with equivalent equipment with equal or less air emissions. The throughput of the line will remain unchanged.
 - The stacks associated with the B2 Prime 2 Dryer will change from 4 stacks to 3 stacks and their location will change;
 - The new Prime 2 Dryer will be steam heated by the existing boilers and the natural gas burners will be eliminated;
 - The stack associated with the B2 Prime Fryer will be increased; and
- Remove the existing steam-heated Parfry fryer (F108);

¹ December 7, 2002 is the dated printed on the permit but it is believed to be typographical error, the permit that was actually revised is dated November 7, 2002.

Application Chronology

December 23, 2013	DEQ received an application and an application fee.
January 7 – January 22, 2014	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
January 22, 2014	DEQ determined that the application was incomplete.
February 10, 2014	DEQ received supplemental information from the applicant.
February 12, 2014	DEQ determined that the application was complete.
February 24, 2014	DEQ made available the draft permit and statement of basis for peer and regional office review.
April 4, 2014	DEQ made available the draft permit and statement of basis for applicant review.
April 22, 2014	DEQ received the permit processing fee.
April 25, 2014	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
B101	<u>Murray 1 Boiler:</u> Manufacturer: Murray Model: MCF4-78 Heat input rating: 100 MMBtu/hr Fuel: Natural gas and biogas	None
B102	<u>Nebraska 1 Boiler:</u> Manufacturer: Nebraska Model: NS-E-68 Heat input rating: 95.58 MMBtu/hr Fuel: Natural gas and biogas	None
B202	<u>Nebraska 2 Boiler:</u> Manufacturer: Nebraska Model: NS-E-57 Heat input rating: 78.05 MMBtu/hr Fuel: Natural gas	None

Source ID No.	Sources	Control Equipment
B203	<u>Murray 2 Boiler:</u> Manufacturer: Murray Model: MCF2-38 Heat input rating: 39.1 MMBtu/hr Fuel: Natural gas	None
C001	<u>Biogas Flare:</u> Manufacturer: Varec Model: 244W	None
D109-D111	<u>Prime 1 Dryer:</u> Manufacturer: Wolverine Proctor Fuel: Steam heated	None
D107	<u>Tot Dryer:</u> Manufacturer: Rey Industries Heat input rating: 4 MMBtu/hr, direct-fired Fuel: Natural gas	None
D209-D211	<u>Prime 2 Dryer:</u> Manufacturer: National Fuel: Steam heated	None
F103	<u>Tot Fryer:</u> Manufacturer: Shockey Model: Ore-Ida	Air washer, Rey Industries Model: G12/24, 20 gpm
F104	<u>Prime 1 Fryer:</u> Manufacturer: Shockey Model: Ore-Ida	Air washer, Ore-Ida, 20 gpm
F204	<u>Prime 2 Fryer:</u> Heat and control	Air washer, Ore-Ida, 20 gpm
E209	Batter Room Collector	Dust collector
E001	<u>Emergency Fire Pump:</u> Manufacturer: Detroit Diesel Model: 6061-A2 Fuel: No. 1 or No. 2 fuel oil	None
	<u>Fire Pump Engine:</u> Manufacturer: Detroit Diesel Rating: 170 hp, Compression Ignition Fuel: Diesel fuel <u>3 – Emergency Generators</u> Rating: Two at 30 hp and one at 25 kW, Spark Ignition Fuel: Natural gas	None

Emissions Inventories

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.

Emission inventories were provided in the application, including the emissions estimates of criteria pollutants, greenhouse gases (GHG), hazardous air pollutants (HAP), and toxic air pollutants (TAP). These emissions were based on emission factors from AP-42, operation of 8,760 hours per year, and process information specific to the facility for this proposed project. The emission inventories have been reviewed by DEQ and appear to accurately reflect potential emissions from the facility.

Pre-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.

Pre-project criteria pollutant emissions were taken from PTC/T2 permit No. T2-2007.0233 issued February 12, 2008 and GHG emissions were taken from P-2012.0043 issued August 16, 2012.

The following table presents the pre-project potential to emit for all criteria and GHG pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff.

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

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO ₂ e	
	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)	lb/hr ^(a)	T/yr ^(b)
B101	2.49	4.88	22.90	99.86	32.77	64.22	27.52	53.95	1.80	3.53		
B102												
B202												
B203												
C001												
D109, D110, D111	6.69	21.67										
D107	2.00	6.48	0.002	0.01	0.60	2.3	1.46	5.6	0.02	0.08		
D205, D206, D207, D208 ^c	5.63	18.23	0.03	0.09	7.06	9.18	17.21	22.38	0.25	0.82		
F103	4.08	13.22							1.20	3.89		
F104	2.68	8.67							2.70	8.67		
F108 ^d	1.30	4.21							0.40	1.24		
F204	2.25	7.29							2.30	7.29		
E209	0.12	0.53										
E001	0.37	0.02	0.3	0.02	5.3	0.27	1.10	0.06	0.40	0.02		
Pre-Project Totals	27.61	85.20	23.23	99.98	45.73	75.97	47.29	81.99	9.07	25.54		59488

- 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) D205-D208 are the four stacks for the Prime 2 dryer before reconfiguration.
- d) F108 is the Parfry fryer and has been removed from service.

Post Project Potential to Emit

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.

The following table presents the post project Potential to Emit for criteria and GHG pollutants from all emissions units at the facility as determined by DEQ staff.

Table 3 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO _{2e}	
	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)	lb/hr ^(a)	T/yr ^(b)
B101	2.49	4.88	22.90	99.86	32.77	64.22	27.52	53.95	1.80	3.53		
B102												
B202												
B203												
C001												
D109, D110, D111	6.69	21.67										
D107	2.00	6.48	0.002	0.01	0.60	2.3	1.46	5.6	0.02	0.08		
D209, D210, D211	5.54	17.93										
F103	4.08	13.22							1.20	3.89		
F104	2.68	8.67							2.70	8.67		
F204	2.25	7.29							2.30	7.29		
E209	0.12	0.53										
E001	0.37	0.02	0.30	0.02	5.30	0.27	1.10	0.06	0.40	0.02		
Post Project Totals	26.22	80.69	23.22	99.89	38.67	66.79	30.08	59.61	8.42	23.48		52273

- 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.

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 4 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO _{2e}	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	27.61	85.20	23.23	99.98	45.73	75.97	47.29	81.99	9.07	25.54		59488
Post Project Potential to Emit	26.22	80.69	22.20	99.89	38.67	66.79	30.08	59.61	8.42	23.48		52273
Changes in Potential to Emit	-1.39	-4.51	-0.03	-0.09	-7.06	-9.18	-17.21	-22.38	-0.65	-2.06	0	-7215

Ambient Air Quality Impact Analyses

As presented in the Modeling Memo in Appendix A, air quality analyses involving atmospheric dispersion modeling of emissions associated with the proposed project were not required to demonstrate the project would not cause or significantly contribute to a violation of any National Ambient Air Quality Standard (NAAQS) or state-only Toxic Air Pollutant (TAP) increment, pursuant to Sections 203.02 and 203.03 of the Idaho Air Rules.

The applicant has demonstrated pre-construction compliance to DEQ's satisfaction that emissions from this facility will not cause or significantly contribute to a violation of any ambient air quality standard.

An ambient air quality impact analyses document has been crafted by DEQ based on a review of the modeling analysis submitted in the application. That document is part of the final permit package for this permitting action (see Appendix A).

REGULATORY ANALYSIS

The regulatory status of McCain Foods has not changed or been altered with the issuance of this PTC. The existing facility regulatory status may be seen in the February 12, 2008 statement of basis that supports the issuance of PTC/T2 permit No. T2-2007.0233, and the applicability of 40 CFR 63 Subpart ZZZZ may be seen in the August 16, 2012 statement of basis that supports the issuance of P-2012.0043, Project 61085.

Permit Conditions Review

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

Existing Permit Condition 1.1 was modified to describe the current project.

Existing Permit Condition 1.3 was modified to replace the current PTC, P-20112.0043 issued on August 16, 2012.

Existing Table 1.1 was modified to show the three new stacks for the Prime 2 dryer, D209-D211, to remove the Parfry fryer, and to show an additional emergency generator for the Biogas flare system.

Existing Permit Condition 2.10 was modified to update the address of the Twin Falls Regional Office.

Existing Permit Condition 3.9 was modified to clarify that it is a condition for the combined total rated heat input capacity of two boilers.

Existing Permit Condition 4.1 was modified to describe the reconfigured Prime 2 dryer.

Existing Permit Conditions 4.2 and 4.3 were modified to describe the reconfigured Prime 2 dryer's three new stacks.

Existing Permit Conditions 4.5, 4.6, 4.7, and 4.9 were modified to remove the Prime 2 dryer. The Prime 2 dryer will be heated by steam from an existing boiler.

Existing Permit Conditions 5.1 and 5.2 were modified to remove the Parfry fryer.

Existing Permit Conditions 5.3, 5.4, 5.6, and 5.7 were modified to remove the Parfry fryer and its existing stack.

Existing Permit Condition 5.5 was modified to specify that the spray-water pump pressure be maintained within the range specified in the O&M manual to explain the recording of the pressure in permit condition 5.7.

Existing Permit Condition 6.3 was modified to reference Section 9 of the permit.

Existing Permit Condition 6.4 was modified to include the conditions that were previously in the monitoring and recordkeeping requirements.

Existing Permit Condition 6.5 was modified to only include the requirement that the filter status be recorded upon inspection.

Existing Permit Condition 7.4 was modified to remove the weekly hourly restriction on the emergency fire pump due to the impracticality for performing necessary maintenance and testing.

Existing Table 9.1 was modified to revise the emission rate limits due to the reconfiguration of the Prime 2 dryer. The parfry fryer was removed from the table.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

APPENDIX A – AMBIENT AIR QUALITY IMPACT ANALYSES

MEMORANDUM

DATE: April 2, 2014

TO: Kelli Wetzel, Permit Writer, Air Quality Division

FROM: Cheryl Robinson, P.E., Air Quality Engineer/Modeling Analyst, Air Quality Division

PROJECT NUMBER: P-2012.0043 PROJ 61312

SUBJECT: Modeling Review for McCain Foods, Burley, Facility ID 031-00014
Reconfigure Prime 2 (B2) Process Line (replace B2 dryer and fryer), Remove Parfry fryer, Replace the 4 existing B2 Dryer Stacks with 3 new 120-ft tall stacks, and Increase the B2 Fryer Stack Height to 120 ft AGL

1.0 Summary

On December 23, 2013, DEQ received a PTC application from McCain Foods USA, Inc. (McCain) to reconfigure the existing Prime 2 (B2) potato processing line. The application and modeling analyses were prepared by Environmental Resource Management's (ERM) Appleton, Wisconsin office. The scope of this project included:

- Increasing the combined allowable annual natural gas use in the four existing boilers from 1,100 to 1,650 MMscf/yr.
 - The Murray 1 (B101, 100 MMBtu/hr) and Nebraska 1 (B102, 95.98 MMBtu/hr) boilers are fueled by natural gas or a mixture of natural gas and biogas. The amount of biogas that may be combusted is restricted by daily and annual limits on emissions of H₂S and SO₂.
 - The Nebraska 2 (B202, 78.05 MMBtu/hr) and Murray 2 (B203, 39.1 MMBtu/hr) are fired exclusively on natural gas.
 - The 30 MMscf/yr natural gas use limit for the Tot dryer remains unchanged.
- Removal of the steam-heated Parfry fryer (F108).
- Removal of the direct-fired 48 MMBtu/hr natural gas burners currently installed and operated with the Prime 2 dryer. The dryer will now be heated using steam produced in existing boilers.

Additional changes addressed in the application compared to the October 15, 2013 description submitted for a modeling determination:

- *Replacement* of the existing B2 prime line dryer and its 48 MMBtu/hr direct-fired natural gas burners (natural gas usage limited to 120 MMscf/yr) with a new dryer with equivalent capacity, heated by steam from the existing four boilers.
 - Removal of the existing B2 dryer stacks, D205 – D208, each with exhaust heights of 39.37 ft and stack diameter equal to 4.79 ft, and
 - Installation of three new B2 dryer stacks, D209 – D211, each with exhaust heights of 120 ft and stack diameter equal to 2.0 ft. The new stacks will be in a different location compared to the existing dryer stacks.
- *Replacement* of the existing B2 fryer with a new unit of equivalent capacity.
 - Increasing the B2 fryer stack (F204) height from 44.62 ft to 120 ft. The exit diameter remains unchanged at 3.18 ft.
- Reconstructing and modifying existing B2 buildings to increase the ceiling/roof height.

During a conference call with DEQ on Wednesday, March 26, 2014, McCain opted to shift the increase in natural gas usage for the four existing boilers to the proposed Plant 3 (B3) project, which is currently being processed by DEQ as PTC No. P-2012.0043 PROJ 61330.

The project timeline and associated submissions are listed below:

- October 10, 2013 Initial telephone contact with DEQ modeling group by Ron VanHandel of ERM.
- October 15, 2013 ERM submitted a description of the proposed reconfiguration, requesting a determination regarding required modeling.
- November 18, 2013 DEQ issued a modeling determination for this project. Based on the description of the proposed project, a review of previous modeling, and a comparison of increased emissions with DEQ modeling thresholds, modeling was required only for the annual increase in NO_x emissions associated with using an additional 550 MMscf of natural gas in the boilers. DEQ also provided an updated AERMOD-ready met data set to ERM, Burley_KBYI_2008-2012t.zip
- November 20, 2013 In response to a question from ERM, DEQ determined that dispersion modeling for this McCain Foods project need not explicitly include co-contributing sources, based on the prevailing wind directions, type of project (increase in NG annual usage), relative locations of potential co-contributing sources, and the conservatism in using the older “default” annual NO₂ background.
- December 23, 2013 Application and modeling files received.
- January 22, 2014 Application deemed incomplete.
- January 29, 2014 DEQ issued an email clarifying the understanding with regard to modeling pollutants other than NO_x for this project.
- February 7, 2014 DEQ requested that the revised NO_x modeling information be submitted as an addendum to the original report, rather than revising the original report.
- February 10, 2014 DEQ received an addendum to the modeling report and revised modeling files for annual NO_x: full-impact analysis includes emissions from the biogas flare, SIL analyses for entire NO_x increase from each of the four boilers, and SIL analyses for entire NO_x increase from each of the four boilers and reduction from removal of P2 (B2) dryer burners.
- February 12, 2014 Application deemed complete.
- March 17, 2014 DEQ noted that 1998 project drawings in the source file for the McCain Burley facility showed natural gas-fired air makeup units (AMUs) totaling approximately 89 MMBtu/hr heat input for Plants 1 and 2. These emissions, in addition to emissions from smaller Reznor gas-fired heaters, the 170 hp emergency diesel fire pump, and three natural gas-fired emergency generators (two rated at 30 hp and one rated at 25 kW), were not included in the facility-wide annual NO_x modeling for the B2 project.
- March 26, 2014 During a conference call with permit writer Kelli Wetzel and modeling analyst Cheryl Robinson, McCain requested that the increase in annual natural gas use in the boilers be deleted from the B2 project scope. The annual increase in natural gas use and NO_x emissions from the sources identified by DEQ on March 17th will be addressed as part of the B3

project scope. McCain's revised approach was formalized in a March 31, 2014 email to DEQ from Doug Hahn.¹

The facility is a *designated facility*, as defined in IDAPA 58.01.01.006, Rules for the Control of Air Pollution in Idaho (Idaho Air Rules), because the facility includes fossil-fuel boilers with a combined heat input greater than 250 MMBtu/hr. The facility's potential to emit (PTE) of particulate matter with an aerodynamic diameter of ten microns or less (PM₁₀), particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}), sulfur dioxide (SO₂), carbon monoxide (CO), and nitrogen oxides (NO_x) each is less than 100 tons per year (T/yr). The facility is not a major facility under the New Source Review (NSR) PSD program.

Air quality analyses involving atmospheric dispersion modeling of emissions associated with the proposed project were not required to demonstrate the project would not cause or significantly contribute to a violation of any National Ambient Air Quality Standard (NAAQS) or state-only Toxic Air Pollutant (TAP) increment, pursuant to Sections 203.02 and 203.03 of the Idaho Air Rules.²

The submitted information demonstrated to the satisfaction of the Department that operation of the proposed facility or modification will not cause or significantly contribute to a violation of any ambient air quality standard, provided the key conditions in Table 1 are representative of facility design capacity or operations as limited by a federally enforceable permit condition.

Table 1. KEY ASSUMPTIONS USED IN MODELING ANALYSES	
Criteria/Assumption/Result	Explanation/Consideration
<p>The new B2 dryer exhausts through 3 new stacks, with exit diameter equal to 2 ft and exit height equal 120 ft.</p> <p>The 3.18 ft diameter B2 fryer stack height will be increased to 120 ft above grade.</p> <p>Process emissions from the B2 replacement dryer and fryer are equal to or less than process emissions from the existing B2 fryer and dryer.</p>	<p>These assumptions were critical to DEQ's <u>one-time</u> determination that modeling was not required for this project for the "increase" in process emissions associated with the replacement B2 fryer and dryer.</p>

¹ DEQ TRIM No. 2014AAG577, March 31, 2014

² Idaho Administrative Code, Department of Environmental Quality, Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01, accessible at <http://adminrules.idaho.gov/rules/current/58/index.html>

2.0 Background Information

2.1 Applicable Air Quality Impact Limits and Modeling Requirements

This section identifies applicable ambient air quality limits and analyses used to demonstrate compliance for this facility located at 218 W Highway 30 in Burley. Approximate UTM coordinates for the facility are 270.5 km Easting and 4713.3 km Northing, in UTM Zone 12 (Datum WGS84). The approximate base elevation at the facility is 1270 meters.

2.1.1 Area Classification

The proposed facility is located within Cassia County which is designated as an attainment or unclassifiable area for carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone, particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (PM_{2.5}), and sulfur oxides (SO_x). There are no Class I areas within 10 kilometers of this location.

2.1.2 DEQ Modeling Thresholds

Modeling is typically not required if the changes in estimated criteria pollutant emission rates for a proposed project are below DEQ's modeling thresholds, shown in Table 2. "Case-by-case" thresholds may be used only with prior DEQ approval. "Threshold II" values were approved for this project.

Criteria Air Pollutants	Averaging Period	DEQ Modeling Thresholds			
		Threshold I		Threshold II (Case-by-Case)	
PM ₁₀	24-hr	0.22	lb/hr	2.6	lb/hr
PM _{2.5}	24-hr	0.054	lb/hr	0.63	lb/hr
	Annual	0.35	T/yr	4.1	T/yr
CO	1-hr, 8-hr	15	lb/hr	175	lb/hr
NO ₂	1-hour	0.20	lb/hr	2.4	lb/hr
	Annual	1.2	T/yr	14	T/yr
SO ₂	1-hr	0.21	lb/hr	2.5	lb/hr
	24-hr	0.22	lb/hr	2.6	lb/hr
	Annual	1.2	T/yr	14	T/yr
Lead	3-month rolling avg	14	lb/mo		

3.0 Compliance Assessment

The scope of this project was reduced by McCain on March 31, 2014 to include just the new B2 fryer and dryer, the changes to the fryer and dryer stacks, and the removal of the steam-heated Parfry fryer. This section describes the methods used by the applicant to demonstrate compliance with applicable air quality standards. The demonstration of compliance normally requires that dispersion modeling be conducted to provide a quantitative assessment of the ambient impacts of the project.

Due to unique circumstances, DEQ is not requiring a modeling demonstration for the purposes of this project. This decision is applicable only to this project and should not be construed to imply that DEQ would approve a similar approach for any future project.

3.1 Change in Emissions

According to information provided in the application, the process emissions from the existing B2 fryer and the replacement B2 fryer will be the same, as will the process emissions from the existing and replacement B2 dryer.

Removing the existing 48 MMBtu/hr natural gas burners from the existing B2 dryer, currently limited to a maximum annual natural gas usage of 120 MMscf, results in a reduction of short-term and annual emissions of criteria pollutants.

The change in emissions associated with this project is shown in Table 3, which includes the decrease in emissions from removing existing equipment and the increase in emissions attributable to installing the new B2 fryer and dryer. As shown in the table, the decrease in emissions of criteria pollutants from this project is greater than the increase in emissions, resulting in an overall decrease in emissions of about 17.3 tons per year of criteria pollutants.

Table 3. CHANGE IN EMISSIONS DUE TO THE B2 RECONFIGURATION PROJECT

Criteria Air Pollutants	Averaging Period	DECREASE IN EMISSIONS					INCREASE IN EMISSIONS		
		Process Emissions ^a		NG Combust 48 MMBtu/hr 120 MMscf/yr	Process Emissions ^a	Total Decrease	Process Emissions ^a Steam-Heated		Total Increase
		Steam-Htd B2 Fryer F204	B2 Dryer D205 – D208	B2 Dryer D205 – D208	Steam-Htd Parfry Fryer F108		B2 Fryer F204	B2 Dryer D209 – D211	
PM ₁₀	24-hr	2.25 lb/hr	5.27 lb/hr	0.358 lb/hr	1.301 lb/hr	9.2 lb/hr	2.25 lb/hr	5.27 lb/hr	7.5 lb/hr
PM _{2.5}	24-hr	2.25 lb/hr	5.27 lb/hr	0.358 lb/hr	1.301 lb/hr	9.2 lb/hr	2.25 lb/hr	5.27 lb/hr	7.5 lb/hr
	Annual	7.29 T/yr	17.8 T/yr	0.456 T/yr	4.214 T/yr	29.8 T/yr	7.29 T/yr	17.8 T/yr	25.1 T/yr
CO	1-hr, 8-hr	---	13.6 lb/hr 17.3 T/yr	3.95 lb/hr 5.04 T/yr	---	17.6 lb/hr 22.3 T/yr	---	13.6 lb/hr 17.3 T/yr	13.6 lb/hr 17.3 T/yr
	1-hour	---	---	4.71 lb/hr	---	4.7 lb/hr			
NO ₂	Annual	---	---	6.00 T/yr	---	6.0 T/yr			
	1-hr	---	---	0.028 lb/hr	---	0.03 lb/hr			
	24-hr	---	---	0.028 lb/hr	---	0.03 lb/hr			
SO ₂	Annual	---	---	0.036 T/yr	---	0.04 T/yr			
	1-hr	---	---	0.028 lb/hr	---	0.03 lb/hr			
VOC	24-hr	2.25 lb/hr	---	0.26 lb/hr	0.383 lb/hr	3.4 lb/hr			
	Annual	7.29 T/yr	---	0.33 T/yr	1.24 T/yr	8.9 T/yr			
Lead	3-month rolling avg	---	---	0.05 lb/mo 3 x 10 ⁻⁵ T/yr	---	0.05 lb/mo 3 x 10 ⁻⁵ T/yr			
Total Decrease, All Criteria Pollutants						67.0 T/yr	Total Increase, All		49.7 T/yr

^a Process emissions were taken from the Technical Analysis dated July 18, 2002 for proposed Permit No. T2-020400, issued August 5, 2002.

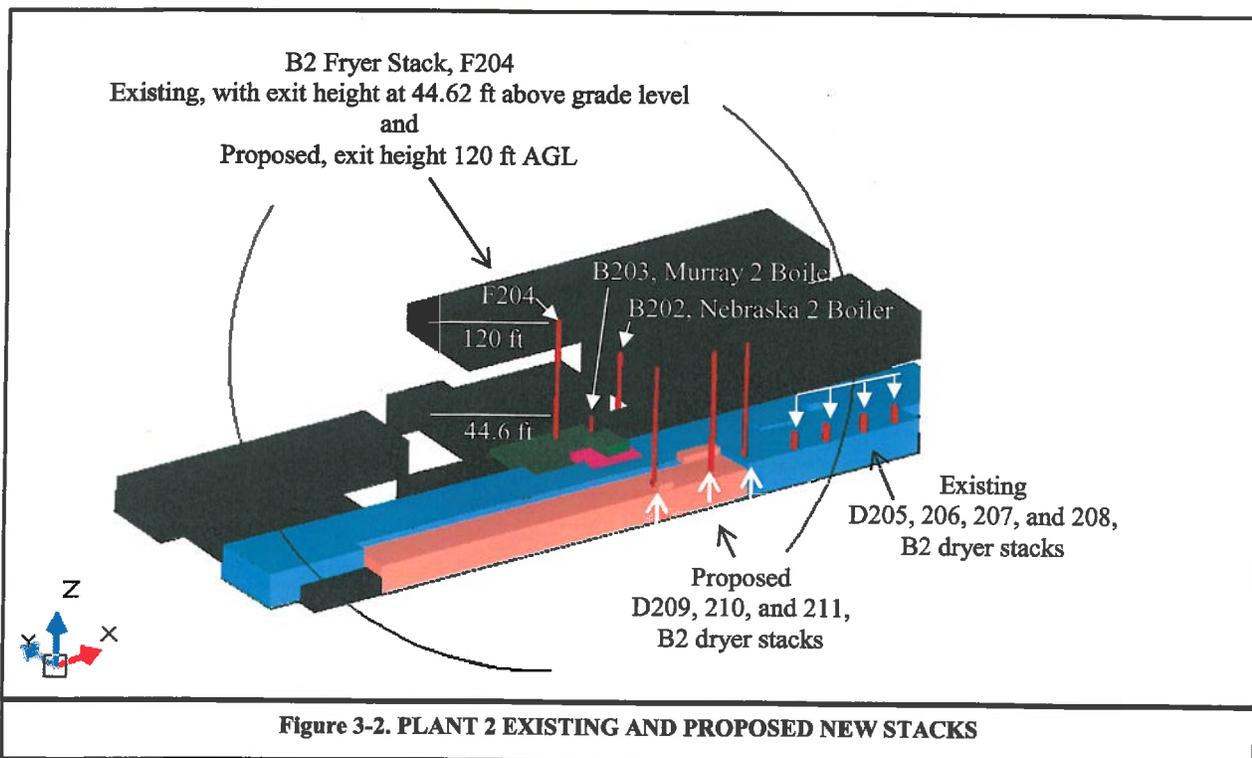
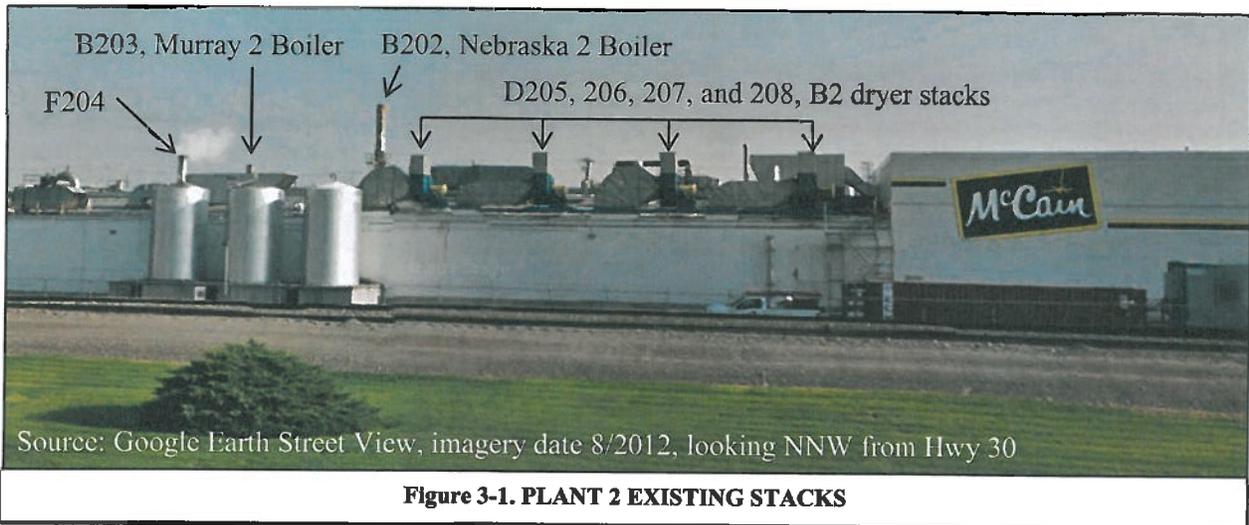
3.2 Emission Release Parameters

This project includes modifications to the existing stacks at Plant 2:

- Increase the B2 fryer (F204) stack height from 13.6 m (44.62 ft) to 36.58 m (120 ft) with no change to the 0.97 m (3.18 ft) exit diameter, and
- Remove the four existing 12 m (39.37 ft) tall B2 dryer stacks and construct three new stacks at a different location, each 36.58 m (120 ft) tall with exit diameter equal to 0.61 m (2.0 ft)

The existing Plant 2 stacks are shown in Figure 3-1, and the existing and new stacks are shown in Figure 3-2. McCain has asserted that the exit temperature and exhaust velocities from the three new B2 dryer stacks will be comparable to the exhaust temperature and velocity from the four existing B2 dryer stacks. Similarly, McCain has asserted that the exhaust temperature and velocity from the proposed 120-ft tall stack for the B2 fryer will be comparable to the exhaust temperature and velocity from the existing 44.6-ft stack.

Because of the shorter stack height of the existing B2 dryer stacks and because exhaust from these stacks would be expected to be more heavily influenced by building downwash than emissions from the three proposed 120-ft tall stacks, it's reasonable to presume that—for the same pollutant emission rate—near-field ambient impacts from the existing configuration would be greater than ambient impacts from the proposed stack configuration. The same is true for emissions from the existing shorter B2 fryer exhaust compared to the proposed configuration with the B2 fryer stack height increased to 120-ft above grade level (AGL).



In addition to the fryer and dryer replacements and changes to stacks for the B2 fryer and dryer, this project includes increases to some existing building roof heights at Plant 2. The existing and updated building parameters for the Plant 2 configuration are summarized in Table 4.

Table 4. BUILDING PARAMETERS – EXISTING AND NEW CONFIGURATION								
Model ID	Description	Base Elev (m)	Tier Height		UTM Datum NAD83 Zone 12			
			(m)	(ft)	Easting X (m)	Northing Y (m)	Easting X (m)	Northing Y (m)
BLDG5	B2 receiving, SE corner	1270	9.50	31.2	266764.8	4712938.2	266782.6	4712953.8
					266781.2	4712937.1	266766.3	4712955.1
BLDG6	B2 N Silt Bin	1265	4.11	13.5	266777.7	4713039.9	266755.9	4713054.0
					266754.9	4713041.9	266778.7	4713052.1
BLDG7	B2 S Silt Bin	1266	4.15	13.6	266777.2	4713035.4	266753.4	4713025.0
					266754.4	4713037.2	266776.2	4713023.0
BLDG10	B2 S packaging	1270	4.11	13.5	266606.9	4712917.7	266588.9	4712912.8
					266606.5	4712911.2	266589.4	4712918.7
BLDG11	BLDG11	1270	5.78	19.0	266662.8	4712944.5	266652.9	4712938.1
					266661.6	4712931.3	266640.6	4712939.3
					266654.0	4712932.2	266640.9	4712944.0
					266654.1	4712934.6	266638.4	4712944.2
					266652.5	4712934.7	266638.7	4712947.2
BLDG13	B2 Peel Room	1270	8.42	27.6	266716.8	4712933.5	266760.0	4712922.8
					266717.3	4712938.0	266707.7	4712927.3
		*	9.94	32.6	266760.9	4712934.1	266708.2	4712934.0
					266732.6	4712927.5	266736.0	4712925.5
BLDG15	B2 Dry Storage	1270	8.54	28.0	266736.3	4712927.1	266732.2	4712925.9
					266649.0	4712955.8	266584.9	4712979.7
BLDG16	BLDG16	1270	5.00	16.4	266650.6	4712974.1	266583.0	4712960.8
					266652.2	4712999.1	266631.7	4712993.7
BLDG17	B2 S Cellar	1266	6.64	21.8	266651.6	4712991.8	266632.4	4713001.1
					266671.9	4713052.9	266547.4	4713033.7
BLDG18	B2 N Cellar	1265	6.64	21.8	266550.2	4713064.1	266669.0	4713022.2
					266677.1	4713097.5	266552.6	4713078.2
BLDG19	B2 E Cellar	1270	6.36	20.9	266555.4	4713108.7	266674.3	4713067.0
					266788.4	4712981.9	266695.1	4713015.0
BLDG21	B1 Peel Room	1270	10.37	34.0	266693.0	4712990.5	266790.5	4713006.8
					266347.0	4712999.0	266160.7	4712963.9
		*	12.20	40.0	266343.1	4712948.8	266164.6	4713014.8
					266161.1	4712968.2	266161.7	4712968.1
					266165.1	4713014.0	266161.4	4712969.0
*	12.42	40.7	266165.7	4713013.9				
			266184.4	4712970.1	266191.5	4712965.5		
BLDG22	B1 Dry Waste	1270	8.84	29.0	266192.0	4712969.3	266184.0	4712966.3
					266226.0	4712968.1	266234.1	4712962.6
BLDG23	B1 N Shop	1270	7.32	24.0	266234.6	4712967.5	266225.2	4712963.2
					266302.7	4713109.8	266273.2	4713128.2
BLDG24	B1 S Shop	1270	9.45	31.0	266270.9	4713112.1	266303.4	4713127.0
					266291.2	4713070.2	266240.2	4713091.2
					266238.2	4713074.1	266293.9	4713086.6
					266300.9	4713012.9	266264.7	4713025.4
					266281.3	4713014.5	266267.0	4713046.1
					266281.8	4713023.1	266303.3	4713043.8

Table 4. BUILDING PARAMETERS – EXISTING AND NEW CONFIGURATION

Model ID	Description	Base Elev (m)	Tier Height		UTM Datum NAD83 Zone 12			
			(m)	(ft)	Easting X (m)	Northing Y (m)	Easting X (m)	Northing Y (m)
BLDG26	B1 E Americold Freezer	1270	11.74	38.5	266028.3	4713162.1	266084.0	4712967.8
					266099.1	4713158.2	266011.1	4712972.8
BLDG30	B1 N Americold Freezer	1270	11.89	39.0	266094.8	4713090.4	266165.0	4713015.8
					266170.4	4713083.9	266089.5	4713019.9
BLDG31	B1 Dry Storage	1270	9.15	30.0	266170.5	4713085.3	266209.7	4713081.2
					266174.8	4713085.0	266214.8	4713080.7
					266175.5	4713098.0	266206.6	4713010.6
					266211.6	4713096.6	266164.9	4713014.2
BLDG33	B1 S Americold Freezer	1270	11.22	36.8	266089.6	4713019.4	266160.2	4712963.0
					266164.6	4713014.8	266084.7	4712969.0
BLDG29	B1 Skins Room	1270	9.56	31.4	266346.8	4712991.9	266376.9	4712965.5
					266378.8	4712989.2	266344.9	4712968.2
		*	11.64	38.2	266368.1	4712984.2	266372.9	4712982.1
					266373.0	4712983.7	266368.0	4712982.3
BLDG30_2	B1 Skins Room S	1270	8.99	29.5	266344.8	4712968.0	266375.4	4712945.8
					266376.9	4712965.5	266343.1	4712948.8
		*	12.03	39.5	266236.5	4712966.9	266375.6	4712952.6
					266376.0	4712954.2	266235.9	4712965.3
BLDG31_2	B1 Skins Room NW	1270	7.73	25.4	266347.5	4712998.7	266355.1	4712991.1
					266355.6	4712998.1	266346.8	4712991.9
BLDG32	B1 Skins Room N	1270	6.51	21.4	266355.8	4713002.2	266379.1	4712996.8
					266363.0	4713001.6	266378.3	4712989.5
					266362.6	4712998.1	266355.1	4712991.4
					266378.8	4712996.8	266410.3	4712969.5
BLDG33_2	B1 Recvg	1270	6.55	21.5	266402.5	4712994.9	266400.0	4712970.4
					266401.7	4712987.3	266399.4	4712958.5
					266412.0	4712986.7	266376.7	4712959.8
					266275.3	4713010.4	266292.3	4713004.1
BLDG34	B1 Dryer N	1270	6.04	19.8	266292.8	4713009.0	266274.8	4713005.3
					266257.5	4713018.8	266275.7	4713014.4
BLDG32_2	B1 Fryer N	1270	7.49	24.6	266257.5	4713019.9	266274.8	4713005.3
					266261.3	4713019.5	266256.5	4713007.0
					266261.1	4713015.5	266257.7	4713018.8
					266251.1	4713007.4	266257.7	4713018.8
BLDG33_3	B1 P1 Fry N	1270	9.54	31.3	266252.3	4713019.0	266256.5	4713007.0
					266242.3	4713032.6	266251.1	4713007.4
BLDG35	B1 Boiler Room	1270	11.43	37.5	266253.3	4713031.7	266240.3	4713008.4
					266488.3	4712994.0	266589.3	4712961.3
BLDG32_3	B2 Americold Freezer	1270	5.49	18.0	266557.3	4712988.1	266587.1	4712937.8
					266555.1	4712972.5	266583.1	4712938.0
					266571.8	4712971.1	266581.9	4712919.6
					266572.1	4712972.1	266589.2	4712918.8
					266584.0	4712971.7	266589.0	4712913.2
					266583.1	4712961.5	266482.3	4712922.0

Table 4. BUILDING PARAMETERS – EXISTING AND NEW CONFIGURATION

Model ID	Description	Base Elev (m)	Tier Height		UTM Datum NAD83 Zone 12				
			(m)	(ft)	Easting X (m)	Northing Y (m)	Easting X (m)	Northing Y (m)	
BLDG32_3	B2 Americold Freezer New Configuration	1270	5.49	18.0	266488.3	4712994.0	266589.1	4712960.1	
					266555.8	4712989.3	266587.1	4712937.8	
					266555.1	4712972.5	266583.1	4712938.0	
					266571.8	4712971.1	266581.9	4712919.6	
					266572.1	4712972.1	266589.6	4712919.1	
					266584.0	4712971.7	266589.0	4712912.8	
					266583.0	4712960.7	266482.3	4712922.0	
BLDG32_4	B2 Packaging N	1270	7.00	23.0	266589.4	4712961.0	266621.1	4712934.0	
BLDG32_4	B2 Packaging N New Configuration	1270	7.00	23.0	266623.3	4712958.2	266587.2	4712937.3	
					266589.2	4712960.3	266621.3	4712934.8	
BLDG33_4	B2 Recvg NE	1270	6.90	22.6	266623.2	4712957.7	266587.2	4712937.8	
					266767.6	4712970.4	266782.7	4712953.8	
BLDG34_2	B2 Recvg	1270	11.87	38.9	266766.3	4712955.1	266784.0	4712969.0	
					266710.0	4712943.2	266767.6	4712970.5	
BLDG35_2	B2 Fry: Tier 2 was incorporated into Bldg 42_2, building corner pt was adjusted	1270	7.21	23.7	266764.8	4712938.3	266712.8	4712975.2	
					266687.5	4712942.7	266673.7	4712924.8	
					266686.2	4712929.0	266661.3	4712926.3	
		*	11.34	37.2	4712931.0	266674.1	4712930.2	266663.0	4712944.4
					266679.6	4712931.1	266685.5	4712922.8	
266685.2	4712930.9	266679.8	4712923.2						
BLDG36	B2 Dry Ingrid Storage	1270	7.29	23.9	266677.6	4712943.2	266712.8	4712975.2	
					266689.7	4712948.2	266675.7	4712978.1	
					266690.0	4712952.2	266661.1	4712979.4	
					266702.1	4712951.2	266660.5	4712973.5	
					266703.8	4712970.8	266665.4	4712973.1	
BLDG37	B2 Batter Room	1270	6.40	21.0	266675.3	4712973.3	266663.5	4712950.4	
					266683.7	4712943.1	266663.5	4712950.4	
BLDG38	BLDG38	1270	7.53	24.7	266684.1	4712948.6	266663.1	4712944.5	
					266707.6	4712927.2	266699.7	4712938.9	
BLDG39	BLDG39	1270	6.74	22.1	266698.7	4712928.1	266708.4	4712938.1	
					266693.5	4712944.9	266687.4	4712939.9	
					266693.3	4712942.6	266706.1	4712938.2	
BLDG40	BLDG40	1270	8.84	29.0	266687.5	4712943.0	266706.6	4712943.9	
					266698.7	4712928.2	266687.2	4712939.6	
BLDG41	BLDG41: incorporated into Bldg 42_2 in new configuration	1270	8.74	28.7	266699.6	4712938.7	266686.3	4712929.1	
					266686.5	4712919.3	266674.5	4712930.0	
BLDG42	B2 S Tier 2 and Tier3 were incorporated into Bldg 42_2 in new configuration	1270	7.01	23.0	266687.2	4712929.0	266673.9	4712920.6	
					266607.1	4712921.2	266703.5	4712903.0	
		*	8.67	28.5	266703.5	4712912.7	266606.5	4712911.0	
					266680.4	4712907.1	266684.1	4712904.8	
					266684.4	4712906.6	266680.0	4712905.2	
*	10.16	33.3	266691.9	4712913.9	266701.3	4712910.4			
266701.4	4712913.1	266691.6	4712911.0						

Table 4. BUILDING PARAMETERS – EXISTING AND NEW CONFIGURATION

Model ID	Description	Base Elev (m)	Tier Height		UTM Datum NAD83 Zone 12			
			(m)	(ft)	Easting X (m)	Northing Y (m)	Easting X (m)	Northing Y (m)
BLDG42_2	B2 Packaging	1270	8.39	27.5	266581.9	4712919.8	266765.7	4712922.3
					266582.8	4712938.4	266764.3	4712904.5
					266662.0	4712931.0	266748.6	4712905.6
					266661.5	4712926.2	266749.0	4712898.9
					266674.2	4712925.2	266703.2	4712903.0
					266674.0	4712920.6	266703.2	4712913.1
					266686.4	4712919.4	266607.1	4712921.6
		*	10.29	33.8	266687.0	4712928.8	266606.9	4712917.8
					266730.9	4712917.8	266736.3	4712915.2
					266736.3	4712917.1	266730.9	4712915.9
		*	10.77	35.3	266714.1	4712914.3	266722.0	4712910.3
					266722.1	4712912.7	266714.0	4712911.9
		*	11.15	36.6	266740.5	4712914.2	266746.1	4712911.9
266746.2	4712913.5				266740.5	4712912.3		
BLDG42_2	B2 Packaging	1270	5.49	18	266581.9	4712919.8	266619.2	4712910.0
					266583.2	4712938.0	266620.2	4712920.3
					266781.5	4712921.0	266607.1	4712921.2
					266779.4	4712895.6	266606.9	4712917.8
		*	8.39	27.6	266750.0	4712923.8	266581.9	4712919.7
					266748.2	4712898.5	266606.9	4712917.8
					266748.2	4712905.9	266607.0	4712921.2
					266764.7	4712904.7	266620.2	4712920.2
					266766.3	4712921.9	266619.2	4712909.9
		*	12.192	40	266583.2	4712938.1	266748.4	4712898.5
					266750.0	4712923.8	266619.2	4712909.9
					266621.3	4712934.7	266748.4	4712898.5
					266748.2	4712904.7	266780.0	4712896.8
BLDG43	Incorporated into Bldg 42_2	1270	5.49	18.0	266765.6	4712922.5	266748.7	4712898.8
					266781.4	4712921.0	266748.6	4712905.8
					266218.9	4712976.1	266227.5	4712972.6
BLDG44	BLDG44	1270	13.22	43.4	266227.6	4712975.3	266218.6	4712973.5
BLDG45	BLDG45	1270	12.85	42.2	266277.2	4712980.1	266285.4	4712976.5
					266285.5	4712979.2	266277.1	4712977.4
BLDG46	BLDG46	1270	12.41	40.7	266296.0	4713000.2	266301.6	4712997.3
					266301.6	4713000.0	266295.9	4712997.5
BLDG47	BLDG47	1270	13.17	43.2	266301.5	4712978.9	266306.2	4712976.6
					266306.3	4712978.2	266301.1	4712977.1
BLDG48	BLDG48	1270	12.24	40.2	266326.5	4712993.2	266333.9	4712988.6
					266334.4	4712992.6	266326.1	4712989.4
BLDG49	BLDG49	1270	13.21	43.3	266325.2	4712978.9	266330.0	4712976.9
					266330.1	4712978.5	266325.2	4712977.0
BLDG50	E Gen Bldg	1266	2.74	9.0	266100.1	4713385.9	266092.9	4713385.8
					266098.7	4713381.6	266093.6	4713387.4
					266093.8	4713383.1	266093.6	4713387.7
					266094.5	4713385.4		
pkgpalet	packaging_palletizing bldg	1270	9.14	30.0	266201.9	4713097.0	266174.5	4713171.8
					266207.9	4713169.7	266169.8	4713098.4

The revised emission release parameters for McCain's Plant 1 and Plant 2 at the Burley facility are shown in Table 5.

Table 5. EMISSION RELEASE PARAMETERS

Emissions Units	Stack ID	UTM Zone 12		Base Elev (m)	Stack Height (m)	Exit Dia (m)	Stack Exit Temp (K)	Stack Exit Flowrate (acfm)	Stack Exit Velocity (m/s)	Stack orientation
		Easting (m)	Northing (m)							
Plant 1										
Murray 1 Boiler	B101	266243.9	4713033.1	1270.0	12.41 (40.7 ft)	1.52 (5.0 ft)	426 (307°F)	29,721	7.73	Default
Nebraska 1 Boiler	B102	266241.6	4713021.0	1270.0	19.79 (65.0 ft)	1.22 (4.0 ft)	426 (307°F)	28,584	11.54	Default
Prime 1 Dryer, w/ air washer, east stack	D105	266287.7	4713000.4	1270	18.5 (60.7 ft)	1.03 (3.38 ft)	375 (215°F)	NG	9.27	Default
Prime 1 Dryer, w/ air washer, west stack	D106	266279.7	4713000.9	1270	18.5 (60.7 ft)	1.03 (3.38 ft)	344 (160°F)	NG	8.19	Default
Prime 1 Fryer, w/ air washer	F104	266267.8	4712998.0	1270	18 (59.1 ft)	0.95 (3.0 ft)	353 (175.7°F)	Not Given	8.91	Default
Tot Dryer	D107	266284.8	4712982.0	1270	16 (66.9 ft)	0.91 (3.0 ft)	321 (118°F)	19,184	13.92	Default
Tot Fryer, steam-heated	F103	266249.1	4712996.05	1270	16.35 (53.6 ft)	1.13 (3.7 ft)	328 (130.7°F)	Not Given	8.13	Default
Parfry Fryer, REMOVED	F108	266235.5	4712962.7	1270	16 (66.9 ft)	0.95 (3.0 ft)	311 (100°F)	Not Given	7.20	Default
Plant 2										
Nebraska 2 Boiler	B202	266700.0	4712945.2	1270.0	20.38 (37.9 ft)	0.91 (3.0 ft)	426 (307°F)	23,097	16.76	Default
Murray 2 Boiler	B203	266686.0	4712937.2	1270.0	11.56 (37.9 ft)	0.91 (3.0 ft)	426 (307°F)	11,562	8.39	Default
Prime 2 Dryer - existing 1 of 4	D205	266716.5	4712903.1	1270.4	12 (39.4 ft)	1.46 (4.8 ft)	318 (112°F)	40,152	11.38	Default
Prime 2 Dryer - existing 2 of 4	D206	266724.9	4712902.3	1270.4	12 (39.4 ft)	1.46 (4.78 ft)	314 (106°F)	42,877	12.16	Default
Prime 2 Dryer - existing 3 of 4	D207	266734.6	4712901.3	1270.4	12 (39.4 ft)	1.46 (4.78 ft)	319 (114.6°F)	35,678	10.12	Default
Prime 2 Dryer - existing 4 of 4	D208	266743.2	4712900.9	1270.4	12 (39.4 ft)	1.46 (4.78 ft)	309 (96.8°F)	40,006	11.34	Default
Prime 2 Dryer, NEW 1 of 3	D209	266681.0	4712908.3	1270.0	36.58 (120 ft)	0.0696 (2.0ft)	Not Given	Not Given	Not Given	Default
Prime 2 Dryer, NEW 1 of 3	D201	266696.4	4712907.1	1270.0	36.58 (120 ft)	0.0696 (2.0ft)	Not Given	Not Given	Not Given	Default
Prime 2 Dryer, NEW 1 of 3	D211	266705.1	4712906.3	1270.0	36.58 (120 ft)	0.0696 (2.0ft)	Not Given	Not Given	Not Given	Default
Prime 2 Fryer, existing	F204	266678.2	4712940.1	1270.0	13.60 (44.62 ft)	0.9693 (3.18 ft)	342.26 (156.4°F)	20, 729	13.26	Default
Prime 2 Fryer, NEW stack ht					36.58 (120 ft)		Not Given			
Batter Room Dust Collector	E209	266661.7	4712947.4	1270	2.64 (8.66 ft)	Not Given	Ambient	Not Given	0.001	Horiz, thru wall

APPENDIX B – FACILITY DRAFT COMMENTS

The following comments were received from the facility on April 17, 2014:

Facility Comment: The pounds per hour value shown for the Prime 2 dryer in Section 9, Table 9.1 of the PTC should be corrected to read 5.54 based on a maximum throughput of 145,800 tons per year and an emission factor of 0.246 pounds per finished ton.

DEQ Response: The calculation has been verified and the requested correction has been made.

Facility Comment: Many of the pounds per hour values shown in Tables 2, 3, and 4 of the Statement of Basis do not match up with the values shown in Table 9.1 of the PTC.

DEQ Response: The hourly values were inadvertently changed and have been corrected to reflect the hourly values shown in Table 9.1 of the PTC.

Facility Comment: Pre-project for CO₂e emissions should be higher than post project emissions with the removal of the B2 dryer.

DEQ Response: The CO₂e emissions were adjusted to reflect the removal of the B2 dryer (D205-D208).

APPENDIX C – PROCESSING FEE

PTC Fee Calculation

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: McCain Foods
Address: 218 West Highway 30
City: Burley
State: Idaho
Zip Code: 83318
Facility Contact: Doug Hahn
Title: Director of Resource Management
AIRS No.: 031-00014

- N** Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
- Y** Did this permit require engineering analysis? Y/N
- N** Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	9.18	-9.2
SO ₂	0.0	0.04	0.0
CO	0.0	22.32	-22.3
PM10	0.0	4.51	-4.5
VOC	0.0	1.57	-1.6
TAPS/HAPS	0.0	0	0.0
Total:	0.0	37.62	-37.6
Fee Due	\$ 1,000.00		

Comments:

