Statement of Basis

Permit to Construct No. P-2009.0115
Project ID 61075

ConAgra Foods Lamb Weston, Inc.
American Falls, Idaho

Facility ID 077-00017

Final

January 9, 2013

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Permit Writer

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

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CI	compression ignition
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hp	horsepower
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
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_x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
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
PTC	permit to construct
PTE	potential to emit
RICE	reciprocating internal combustion engines
Rules	*Rules for the Control of Air Pollution in Idaho*
scf	standard cubic feet
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO_2	sulfur dioxide
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
ULSD	ultra-low sulfur diesel
VOC	volatile organic compounds
$\mu g/m^3$	micrograms per cubic meter

FACILITY INFORMATION

Description

ConAgra Foods Lamb Weston, Inc. (CFLWI) is a potato processing company. Products include frozen fried potato products, hash browns, and dehydrated potato flakes. The facility operates two frozen fried product lines (1 and 2), a dehydrated flake product line, and two specialized product lines (3 and 5). The frozen fried product lines consist of a dryer and a fryer and each fryer is controlled by a wet scrubber. The dehydrated flake product line consists of two dryers and a pneumatic material handling system with three baghouses. Specialized product line 3 consists of a dryer and a roaster, and Line 5 contains a dryer and two fryers, from which emissions are controlled by two wet scrubbers.

Process steam and hot water are supplied by three boilers. Boilers 1, 2, and 3 are fired on natural gas. These boilers are rated at 98.5 MMBtu/hr, 47.2 MMBtu/hr, and 46.7 MMBtu/hr heat input, respectively.

Natural gas-fired space heaters provide heated make-up air at the facility. Aggregated heat input capacity is 79.7 MMBtu/hr.

Permitting History

This PTC is a revision to the existing facility's permit No. P-2009.0115, Project No. 60873, issued November15, 2011.

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).

November 15, 2011	PTC P-2010.0115, Project No. 60873. This permit is a PTC revision. Permit status (A, but will become S upon issuance of this permit).
November 16, 2009	P-2010.0115, This PTC is a transfer from combo Tier II operating permit/PTC to PTC. Also, this PTC is a modification to decrease daily production throughput at the facility to demonstrate compliance with 24-hour PM_{10} NAAQS. Additionally Boiler No. 4 was removed and alternative fuels distillate and vegetable oil are no longer requested as options by CFLWI. Permit status (S).
November 15, 2007	Tier II/PTC combo permit T2-2007.0083 was issued which superseded T2-040324. This was a permit renewal and to increase Specialized Production Line 5 production maximum. Permit status (S).
March 8, 2005	Tier II/PTC combo permit T2-040324 was issued which superseded T2-077-00017. This was a facility name change revision. Permit status (S).
July 31, 2002	Tier II/PTC combo permit T2-077-00017 was issued which superseded Tier II 077-00017. This was to establish facility emissions below Tier I levels and comply with National Ambient Air Quality Standards (NAAQS). Permit status (S).
June 2, 2000	Tier II permit 077-00017 was issued to change limits and added dryers to increase throughputs. Permit status (S).
February 23, 1996	Tier II permit 077-00017 was issued to update the contact person and deletion of BTU value in general operating requirements. Permit status (S).
December 27, 1995	Tier II permit 077-00017, initial permit. Permit status (S).

Application Scope

The proposed permit to construct (PTC) is to revise PTC No. P-2009.0115 Project No. 60873, issued on November 15, 2011 to limit the greenhouse gases (CO_2e) emissions to less than the Title V operating permit major source threshold, to correct typographical errors contained in the previously issued permit, and to permit an existing emergency fire pump engine and three existing propane-fired emergency engines.

Application Chronology

June 27, 2012	DEQ received an application and an application fee.
July 11 – July 26, 2012	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action. During this time, there was not a request for a public comment period on DEQ's proposed action.
July 25, 2012	DEQ determined that the application was incomplete.
August 24, 2012	DEQ received supplemental information from the applicant.
September 24, 2012	DEQ determined that the application was complete.
November 1, 2012	DEQ made available the draft permit and statement of basis for peer and regional office review.
November 19, 2012	DEQ made available the draft permit and statement of basis for applicant review.
December 6, 2012	DEQ received the permit processing fee.
January 14, 2013	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSION UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emissions Point ID No.
Boiler #1	Manufacturer: Cleaver Brooks Model: 2800/DLDH-94 Max steam cap: 80,000 lb/hr Max heat Input: 116.3 MMBtu/hr	None	Height:51 feet (minimum) Exit Diameter: 4.17 feet Exit Gas Flow: 31,843 acfm Exit Temperature: 505 °F
Boiler #2	Manufacturer: Cleaver Brooks Model: 1100/D-60 Max steam cap: 38,000 lb/hr Max heat Input: 47.2 MMBtu/hr	None	Height:51 feet Exit Diameter: 3.33 feet Exit Gas Flow: 16,232 acfm Exit Temperature: 567 °F
Boiler #3	Manufacturer: Cleaver Brooks Model: 1100/D-60 Max steam cap: 34,500 lb/hr Max heat Input: 46.8 MMBtu/hr	None	Height:51 feet Exit Diameter: 3.33 feet Exit Gas Flow: 15,983 acfm Exit Temperature: 561 °F
Drum Dryer 1 & 2	Manufacturer: Blonox Model: #17576	None	Height: 47 feet Exit Diameter: 4.00 ft Exit Gas Flow: 13,100 acfm Exit Temperature: 103 °F
Deluge Fryer 1	Manufacturer: Gem Equipment Model: "Custom Built"	Reyco Scrubber Model: 2500 Type: Spray Chamber Water flow: 240-320 gpm Pressure drop: < 3.5 inches of H_2O	Height: 46 feet Exit Diameter: 6.33 feet Max Inlet Flow Rate: 25,000 acfm Max Outlet Flow Rate: 19,500 acfm Exit Temperature: 173 °F
Deluge Fryer 2	Manufacturer: Gem Equipment Model: "Custom Built"	Ducon Scrubber Model: UW-3, size 90 Type: Spray Chamber Water flow: 30-60 gpm Pressure drop: < 1 inches of H_2O	Height: 46 feet Exit Diameter: 6.33 feet Max Inlet Flow Rate: 26,000 acfm Max Outlet Flow: 23,794 acfm Exit Temperature: 173 °F
Flake Product Line	Dehydrated Flakes	Kice Filter Model: Ken Bratney Co. Kice 21-8 Dust Collector	Height: 43.1 feet Exit Diameter: 0.88 feet Exit Gas Flow: 1,750 acfm Exit Temperature: 97 °F
Flake Product Line	Dehydrated Flakes	Pneumafil Filter Model: Fabric Filter (6.5-92-6)	Height: 33.3 feet Exit Diameter: 1.42 feet Exit Gas Flow: 5,702 acfm Exit Temperature: 70 °F
Flake Product Line	Dehydrated Flakes	Mikro-Pulsaire Filter	Height: 33.3 feet Exit Diameter: 1.42 feet Exit Gas Flow: 5,702 acfm Exit Temperature: 70 °F
Specialized Product Lines No. 3, and No. 5	Dehydrated Flakes	Reyco Scrubbers	Height: 50 ft Exit Diameter:3.55 ft,2.86 ft Exit Gas Flow:14,700 acfm Exit Temperature: 175 °F
Space Heaters	NA	None	NA
Four Emergency Engines	Diesel Fire Pump Emergency. Engine Manufacturer: Detroit Allison Model; DDFPT6AT-7015 Maximum Capacity: 302 bhp Date of Construction: 1985 Propane Emergency Engine Manufacturer: Onan Model; 7.5 JB-3CR/2442T Maximum Capacity: 15 hp Date of Construction: 1993 Propane Emergency Engine Manufacturer: Kohler Model: 10RY62/110470-621 Maximum Capacity: 17 hp	None	NA

	Date of Construction: 1997 Propane Emergency Engine Manufacturer: Kohler Model: 6.5 RMY62/140131-621 Maximum Capacity: 12.7 hp Date of Construction: 1997		

Emissions Inventories

Prior to this permitting action, the potential to emit (PTE) for greenhouse gases (GHG) from the entire facility exceeded the major source threshold of 100,000 T/yr, on a carbon dioxide and its equivalent (CO_2e) emissions basis. Being a major source for CO_2e would require the facility to be permitted to TV operating permit. However, CFLWI chose to submit a synthetic minor PTC application to revise its PTE of CO_2e emissions to below 100,000 T/yr to avoid permitting under TV operating permit program requirements. CFLWI chose to accept enforceable limitations on the facility's PTE to below the GHG major source threshold by limiting the fuel consumption from all combustion sources existing at the facility. The combustion sources at the facility are three natural gas boilers, emergency diesel and propane fired generator engines, and the natural gas space heater units. As such, the permittee has submitted the emission inventory for the GHG from all combustion sources at the facility and showed that the CO_2e emission is equal to 99,851 T/yr, which is below the new major source threshold (100,000 T/yr).

It should be noted that emissions of criteria air pollutants, toxic air pollutants (TAP), and hazardous air pollutants (HAPs) from the facility will not change from those found in the previous PTC No. P-2009.0115 Project No. 60873, issued on November 15, 2011. All emission rates in the existing permit are carried over to the revised permit with no change in emissions rates resulted from this permitting action. However, the permittee requested in the PTC application to add or correct the following information and emissions rates that were previously modeled but were not included in the PTC No. P-2009.0015, issued November 16, 2009, and was incorrectly carried over to PTC No. P-2009.0115 Project No. 60873, issued November 15, 2011. DEQ has confirmed that the requested addition of PM_{10} emissions rates were modeled in the 2009 permit and the modeled pollutants showed compliance with NAAQs. Below are the information and the PM_{10} emissions rates that are added to this permit:

Table 5: In the source description of Table 5, DEQ revised the "Frozen Fried Product Line 1" to Frozen Fried Product Line 1 Deluge Fryer. Also, as requested by the permittee DEQ revised the annual PM_{10} emissions rates from 15.53 T/yr to 16.34 T/yr.

Additionally, as requested by the permittee DEQ added to the source description of table 5 the Frozen Fried Line 1 Dryer and the PM_{10} emissions rates for that source of 1.91 lb/hr and 7.53 T/yr.

Table 8: In the source description of Table 8, DEQ revised the "Frozen Fried Product Line 2" to Frozen Fried Product Line 2 Deluge Fryer. Also, as requested by the permittee DEQ revised the annual PM_{10} emissions rates from 10.35 T/yr to 10.90 T/yr.

Additionally, as requested by the permittee DEQ added to the source description of table 8 the Frozen Fried Line 2 Dryer and the PM_{10} emissions rates for that source of 1.27 lb/hr and 5.02 T/yr.

For more details on CO_2e emissions estimates, refer to the permit application submitted on June 27, 2012.

Ambient Air Quality Impact Analyses

Since emissions will not increase as a result of this permitting action, modeling is not required.

However, it should be noted that emissions from the existing emergency fire pump engine and three propane-fired emergency engines at the facility were not included in the 2009 facility-wide modeling analyses. On August 24, 2012, the permittee submitted a response to DEQ incompleteness letter (issued on July 25, 2012) explaining the reasons for not modeling for the emissions from the emergency engines. The DEQ modeling analysis staff has reviewed the permittee's explanation and found it to be reasonable not to model for these sources.

The previous facility-wide modeling conducted for the PTC No. P-2009.0115, issued on November 16, 2009, had 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. The applicant had also demonstrated pre-construction compliance to DEQ's satisfaction that the emissions increase due to the previous permitting action did not exceed any acceptable ambient concentration (AAC) or acceptable ambient concentration for carcinogens (AACC) for toxic air pollutants (TAP).

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Power County, which is designated as attainment or unclassifiable for $PM_{2.5}$, PM_{10}, SO_2, NO_2, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

For the PTC No. P-2009.0115 Project No. 60873, issued on November15, 2011, the Aerometric Information Retrieval System (AIRS) classification for this facility was an "A" because the facility's potential to emit of GHG or as known carbon dioxide and its equivalent (CO_2e) was above the applicable major source thresholds of 100,000 T/yr.

However, for this permitting action, the facility is requesting to lower the emissions of the GHG to below major source threshold to avoid permitting under TV requirements. As such, when this permit is issued to the facility, the facility classification will not be A. It should be noted that without the GHG emissions and based on the emission inventory found in the statement of basis for the facility's permit no. P-2009.0115, issued on November 16, 2009, the uncontrolled potential to emit for NO_x and CO are above the applicable major source thresholds of 100 T/yr for each of these pollutants and, therefore, the new classification for the facility is now a synthetic minor facility with emissions greater than or equal to 80% of a major source threshold or "SM80".

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 .....Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the proposed revision of the PTC No. P-2009.0115 Project No. 60873, issued on November 15, 2011. The proposed revision will not result in increase in any regulated air pollutants or state toxic air pollutants. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 .....Tier II Operating Permit

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

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 .....Visible Emissions

The sources of PM_{10} emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 12.

Standards for Fuel Burning Equipment (IDAPA 58.01.01.675)

IDAPA 58.01.01.675 .....Fuel Burning Equipment

The fuel burning equipment located at this facility, with a maximum rated input of ten (10) million BTU per hour or more, are subject to a particulate matter limitation of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting gaseous fuels. Fuel-Burning Equipment is defined as any furnace, boiler, apparatus, stack and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer. This requirement is assured by Permit Condition 62.

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

IDAPA 58.01.01.301 .....Requirement to Obtain Tier I Operating Permit

The facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM_{10}, SO_2, NO_X, CO, VOC or 10 tons per year for any one HAP or 25 tons per year for all HAPs combined as demonstrated in the statement of basis for permit No. P-2009.0115, issued on November 16, 2009. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006.120 and the requirements of IDAPA 58.01.01.301 do not apply.

It should also be noted that the facility has submitted the application for this permitting action to limit the emissions of the greenhouse gases (GHG) to less than the Title V operating permit major source threshold (100,000 T/yr) to avoid permitting requirements under TV program.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 .....Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is/is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

40 CFR 60, Subpart Dc .....Standards of Performance for Small Industrial–Commercial–Institutional Steam Generating Units

40 CFR 60.40c Applicability

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

To be applicable, a facility must have a steam generating unit (boiler) that was constructed after June 9, 1989 and a capacity between 10-100 MMBtu/hr.

CFLWI does have three boilers with capacities between 10-100 MMBtu/hr, but all were constructed prior to June 9, 1989. Therefore, the facility is not subject to 40 CFR 60, Subpart Dc.

NESHAP Applicability (40 CFR 61)

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

MACT Applicability (40 CFR 63)

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

The facility has an existing emergency diesel fired pump engine with a capacity of 302 brake horsepower (bhp), propane emergency engines with a capacities of 15 bhp, 17 bhp, and 12.7 bhp that are subject to National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ. The requirements of this subpart are included in the permit.

§ 63.6585 Am I subject to this subpart?

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

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

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

CFLWI does operate a 302 bhp emergency fire pump and propane emergency engines periodically throughout the year and it is used in emergency situations only. In addition, the facility is an area source for HAPs as they are below the major source thresholds of 10 T/yr for any one federally regulated HAP and 25 T/yr for all HAPs combined.

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

This subpart applies to each affected source.

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

(1) Existing stationary RICE.

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

The engines located at CFLWI are considered existing as it was constructed before June 12, 2006.

§ 63.6595 When do I have to comply with the subpart?

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

The applicable fire pump emergency IC engine must be in compliance with the Subpart no later than May 3, 2013; and the three SI emergency engines must be in compliance with the subpart no later than October 19, 2013.

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

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

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

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

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

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

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

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

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

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

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

If you own or operate an existing non-emergency, non-black start CI stationary RICE with a site rating of more than 300 brake HP with a displacement of less than 30 liters per cylinder that uses diesel fuel, you must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel. Existing non-emergency CI stationary RICE located in Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, or at area sources in areas of Alaska not accessible by the FAHS are exempt from the requirements of this section.

CFLWI operates emergency engines; therefore this section does not apply to the facility.

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

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

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

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

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

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

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

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

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

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

§ 63.6615 When must I conduct subsequent performance tests?

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

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

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

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

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

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

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

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

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

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

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

(i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has

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

This section allows CFLWI to develop their own oil analysis program to modify the oil changing frequency if the program meets all criteria set forth in subsection i of the subpart.

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

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

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

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

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

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

Section 9 of Table 6 of the subpart pertains to the emergency IC and SI engines at CFLWI. Requirement work practices are accounted for within Permit Condition 76 of the associated permit.

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

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

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

(iii) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing

authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.

The above requirements pertain specifically to emergency engines. Permit Condition 78 accounts for these requirements.

§ 63.6645 What notifications must I submit and when?

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

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

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

§ 63.6650 What reports must I submit and when?

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

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

§ 63.6655 What records must I keep?

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

(2) An existing stationary emergency RICE.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

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

CFLWI needs to maintain records demonstrating that the engines are being operated in accordance with an appropriate maintenance plan. Records of operational hours from the non-resettable meters must also be kept, and how many hours were spent in emergency situations and demand response. This requirement is established in Permit Condition 77.

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

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

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

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

Permit Condition 77 also accounts for these requirements.

New Permit Conditions: The NESHAP General Provisions and the Incorporation of Federal Requirements by Reference in Permit Conditions 27 and 79. The permittee shall comply with all applicable requirements of 40 CFR 63 Subpart ZZZZ and all applicable general provisions of 40 CFR 63 Subpart. These permit conditions are new and are included in the permit because the MACT Subpart ZZZZ is applicable to the 302 bhp emergency fire pump engine and the propane emergency engines that exist at the facility.

40 CFR 63 Subpart JJJJJJ .....NESHAPS for Industrial, Commercial, and Institutional Boilers Area Sources

The facility is not proposing to add any emissions units that are subject to MACT standards in 40 CFR Part 63.

On March 21, 2011 EPA promulgated NESHAPs for boilers at area sources of hazardous air pollutants (HAPs) emissions (40 CFR 63 Subpart JJJJJJ). Area sources are source that are not major for HAPs. CFLWI is an area source of HAPs. However, CFLWI only combusts natural gas fuel in the boilers and therefore is not affected by this NESHAP. In accordance with 40 CFR 63.11194 (What is the affected source of this subpart?) a boiler must combust coal, biomass (solid) or oil to be an affected emissions unit.

Permit Conditions Review

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

Deleted Existing Permit Condition 14 (Obligation to Comply)

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

This permit condition existed in the previous PTC. It is already redundent with PTC General Provision Permit Condition 82. Therefore, the Facility-Wide previous Permit Condition 14 is deleted in this permit.

New Permit Condition 15 (CO_2e Gases Emission Limits) is included in the Facility-Wide Conditions to specify the new emissions limits for the GHG, which are set in the permit to less than 100,000 T/yr of CO_2e per any consecutive 12-calendar month period.

New Permit Conditions 16, 17, and 18 (Fuel Consumption Requirements) are included in the Facility-Wide Conditions to specify the amount of natural gas fuel, No. 2 diesel fuel oil, and the propane gas usage, which are used for the emissions estimates of CO_2e from all combustion sources at the facility. These limits are set in the permit to 1,673 MMscf, 1,500 gallons, and 548 gallons, respectively, per any consecutive 12-calendar month period.

New Permit Conditions 20 and 21 (Fuel Consumption Monitoring and Recording) are included in the Facility-Wide Conditions require the permittee to monitor and record the calendar date and the total amount of all fuels consumed at the entire facility per month and per any consecutive 12-month period for determining compliance with Permit Conditions 16, 17, and 18.

Permit Condition 22 requires the permittee to calculate the CO_2e emissions from the entire facility on monthly and on any consecutive 12-month period to determine compliance with Permit Condition 15.

All information in Permit Conditions 21 and 22 are required to be kept at the facility for five years and be available to DEQ representatives upon request.

All other permit conditions existed in the PTC No. P-2009.0115 Project No. 60873, issued on November 15, 2011 remained unchanged and is carried over to the revised PTC.

New Permit Condition 27 (Incorporation of Federal Requirements by Reference).

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 – PROCESSING FEE