



Air Quality Permitting Statement of Basis

March 22, 2004

Permit to Construct No. P-040401

Rupert Cogeneration Partners, Ltd., Rupert, Idaho

Facility ID No. 067-00012

Prepared by:

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AIR QUALITY DIVISION**

FINAL REVISED PERMIT

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Acronyms, Units, and Chemical Nomenclatures

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
SO ₂	sulfur dioxide
SM	synthetic minor
UTM	Universal Transverse Mercator

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, for issuing permits to construct.

2. FACILITY DESCRIPTION

Rupert Cogeneration Partners, Ltd. (Rupert Cogen) uses a natural gas-fired turbine to produce electricity. Waste heat produced by the gas combustion process in the turbine is used to produce process steam for operations at Idaho Fresh-Pak, Inc.'s, Plant No. 3.

3. FACILITY / AREA CLASSIFICATION

Rupert Cogen is defined as a synthetic minor facility because without enforceable limits on the facility's potential to emit, NO_x emissions would exceed 100 tons per year. The AIRS classification is "SM" because the potential to emit of NO_x is limited to less than major source levels.

The facility is located within AQCR 63 and UTM zone 12. The facility is located in Minidoka County which is designated as Unclassifiable for all criteria pollutants (CO, PM₁₀, NO_x, SO₂, lead, and ozone).

The AIRS information provided in the October 14, 2003 Air Quality Permitting Statement of Basis defines the classification for each regulated air pollutant at the Rupert Cogen facility. Because this permitting action does not change the facility's potential to emit, the AIRS database does not have to be updated.

4. APPLICATION SCOPE

On October 21, 2003, DEQ issued modified PTC No. P-030400 to Rupert Cogen for their natural gas-fired cogeneration facility. A permit hand-off meeting was held January 6, 2004, at which time DEQ and Rupert Cogen personnel reviewed the terms and conditions of the permit. During this meeting, the following information was identified as being incorrect, thus requiring a permit revision. This permit revision does not result in an increase in emissions; consequently, the revised permit does not require an opportunity for public comment.

1. Cover Page Changes

- | | |
|------------------------------|---|
| Item 3; Mailing Address | Please change to 811 South Oneida, Rupert, ID 83347 |
| Item 5; Responsible Official | Please change to match the information under Item 4, Facility Contact |
| Item 6, Exact Plant Location | Please change to "Rupert, Idaho on Idaho Fresh-Pak Inc. property." |

2. Pages 4 through 11

Date Issued (top right corner) should be changed to 2003

3. Page 5, Item 2.4

The NO_x NSPS limit is stated as 0.0200% by volume of exhaust gas at 15% oxygen and on a dry basis as required by 40 CFR 60.333(a)(2). The previous August 12, 1998 permit had this correctly calculated to be 0.0212%. It appears the limit has been rounded down in this new permit and we would request it be returned to the limit as stated in the previous permit.

4.1 Application Chronology

February 6, 2004 DEQ receives PTC application requesting a permit revision
March 4, 2004 DEQ determines the application complete

5. PERMIT ANALYSIS

DEQ has reviewed Rupert Cogen's permit application and has made the following changes. The text that is struck through identifies the text that has been deleted. The text that is underlined identifies the text that has been added. Please note, none of the changes associated with this permit revision result in an increase of any regulated air pollutant.

1. Cover Page Changes

Item 3; Mailing Address ~~71 Allen Street, Building A, Rutland, VT 05701~~
811 South Oneida, Rupert, ID 83347

Item 5; Responsible Official ~~Mr. Bruce Peacock, Asset Manager, (802) 772-6777~~
Mr. Chris Harriman, Plant Manager, (208) 436-1596

Item 6, Exact Plant Location ~~Rupert, Idaho on Magic Valley Foods, Inc. property~~
Rupert, Idaho on Idaho Fresh-Pak Inc. property.

2. Pages 4 through 11 (Typographical Error)

Header, Pages 4 through 11 Date Issued: ~~October 21, 20003~~
Date Issued: March 26, 2004

3. Page 5, Item 2.4 (Typographical Error)

NSPS nitrogen oxides limit ~~0.0200% by volume of exhaust gas at 15% oxygen and on a dry basis~~
0.0212% by volume of exhaust gas at 15% oxygen and on a dry basis

5.1 Equipment Listing

No change, refer to October 14, 2003 Air Quality Permitting Statement of Basis.

5.2 Emissions Inventory

No change, refer to October 14, 2003 Air Quality Permitting Statement of Basis.

5.3 Modeling

No change, refer to October 14, 2003 Air Quality Permitting Statement of Basis.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.209.04 *Revisions of Permits to Construct*

IDAPA 58.01.01.209.04 establishes the requirements for PTC revisions. The revisions identified in this document relate to facility-specific information made available to DEQ during the January 6, 2004 permit hand-off meeting, and correct typographical errors discovered during that same meeting. The permit revision does not result in an increase in emissions; therefore, the revised permit does not require an opportunity for public comment.

5.5 Fee Review

In accordance with IDAPA 58.01.01.224.02 and 224.03, the permit to construct application fee of \$1000 does not apply because this permit revision corrects typographical errors and makes change to the facility mailing address and the responsible official. In accordance with IDAPA 58.01.01.225, no processing fee is required for IDAPA 58.01.01.224.02 and 224.03 changes.

6. PERMIT CONDITIONS

The only change to a permit condition as a result of this permit revision is to correct the NSPS NOx limit specified in Permit Condition 2.4 as discussed previously in this document. No other permit term or condition has been affected, and the change does not result in an emissions increase.

7. PUBLIC COMMENT

This permit revision does not result in an emissions increase; consequently, an opportunity for public comment is not required in accordance with IDAPA 58.01.01.209.04. The references to Subsections 209.02.a and 209.02.b do not apply because this facility is not a major facility as defined by IDAPA 58.01.01.205.

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that Rupert Cogeneration Partners Ltd. be issued revised PTC No. P-040401. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

BR/sd Permit No. P-040401

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