

Statement of Basis

**Permit to Construct No. P-2015.0013
Project ID 62069**

**CTI Foods - SSI Food Services Division
Wilder, Idaho**

Facility ID 027-00138

Final



**June 29, 2018
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Permit Writer**

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

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
Btu	British thermal units
CAA	Clean Air Act
CAS No.	Chemical Abstracts Service registry number
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
CO ₂	carbon dioxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GACT	Generally Available Control Technology
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
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
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 ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O ₂	oxygen
PAH	polyaromatic hydrocarbons
PC	permit condition
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTE	potential to emit
PW	process weight rate

RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
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
SO _x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
ULSD	ultra-low sulfur diesel
VOC	volatile organic compounds

FACILITY INFORMATION

Description

CTI Foods – SSI Food Services Division operates an existing food processing facility which is located in Wilder, Idaho. At this facility, four natural gas-fired boilers and a natural gas-fired water heater are used to provide steam and hot water for food processing equipment at the facility. There are also two multi-purpose ovens (MPOs), two fajita branders, two Unitherms, a Cook King, a Fajita Fulton, and a Cook Fulton that are all natural gas-fired and are used to cook meat at the facility. There is also one diesel-fired emergency IC engine which powers a fire water pump.

MPOs

The two Multi-Purpose Ovens are on the fajita line, which operate in parallel with each other, and cook the meat products with steam and direct-fired heat.

Unitherms

The two Unitherm ovens are searing/cooking units on the Cooked Patty line, with direct-fired heat, and are used to provide char flavor and branding marks on the meat products.

Fulton Heaters

Fulton is a brand of thermal fluid heater that provides an in-direct heat source to cook the meat products in the Stein JSO ovens on the cooked patty line and the Pro-grill oven on the fajita line. One Fulton heater is currently dedicated to each line.

Cook King

The Cook King is a brand of branding/searing oven on the Fajita Line that adds char flavor and branding marks to the meat products using direct-fired heat.

Fulton Thermal Fluid Heater

The Fulton Thermal Fluid Heater is used to heat thermal fluid used to cook products on both the fajita and cooked patty lines.

Emergency IC Engine

The facility has one emergency IC engine that powers a fire water pump.

Plant History

CTI Foods – SSI food Services Division purchased this facility in 1985 from the J.R. Simplot Co. The plant was operated as a kill plant until 1987 when it was remodeled and converted to a processing plant only. In August of 1988, the plant was badly damaged in a fire originating in the freezer. The plant was rebuilt and opened again in 1989 with a dual IQF patty line, a cook patty line, and a packaging area for sandwich assembly.

In 1992, Plant 2 was added and a cook line was added. The Plant 1 cook patty line was joined by a single kettle line for taco meat. The cook patty line was moved to Plant 2 and a second kettle for taco meat was added in Plant 1. A maintenance shop was added to the rear of the plant in 1992.

Plant 3 was added in 1996. First designed as a storage facility and a truck shop, the buildings were joined and converted to production. Initially, Plant 3 was configured to do cooked tacos, but when that opportunity passed, Plant 3 was modified to produce cooked patties.

The Finished Goods Freezer Storage additions were completed in 1999 and 2013. The receiving area was expanded in 2014. The main office area was expanded in 2015. Plant 2 was added on to, which included the addition of a Fulton heater.

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).

May 27, 2016 P-2015.0013, Initial permitting action for an existing facility, Permit status A, but will become S upon issuance of this permit.

Application Scope

This PTC is a revision of an existing PTC.

The applicant has proposed to:

- Install and operate a Sellers Natural Gas Fired 2018 BT-100-1500 Water Heater to replace a like model.
- Correct typographical errors to change the 300 Sellers Boiler to a 200 Sellers Boiler, as was listed in the application for P-2015.0013 issued May 27, 2016.

Application Chronology

May 25, 2018	DEQ received an application and an application fee.
June 13, 2018	DEQ determined that the application was complete.
June 13, 2018	DEQ made available the draft permit and statement of basis for peer and regional office review.
June 19, 2018	DEQ made available the draft permit and statement of basis for applicant review.
June 27, 2018	DEQ received the permit processing fee.
June 29, 2018	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSION UNITS AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emission Point ID No.
1	<u>500 Sellers Boiler:</u> Manufacturer: Sellers Model: 105E Burner Model: 5000-C-P Manufacture Date: 7/2002 Heat input rating: 20.9 MMBtu/hr Fuel: Natural Gas	N/A	<u>500HP Exhaust:</u> Exit height: 57.0 ft (17.37 m) Exit diameter: 2.5 ft (0.762 m) Exit flow rate: 5,817 acfm Exit temperature: 370 °F (460.93 °C)
2	<u>350 Clayton Boiler:</u> Manufacturer: Clayton Model: EG-354 Burner Model: 4000-C-P Manufacture Date: 2011 Heat input rating: 14.645 MMBtu/hr Fuel: Natural Gas	N/A	<u>350HP Exhaust:</u> Exit height: 50.0 ft (15.24 m) Exit diameter: 2.0 ft (0.61 m) Exit flow rate: 4,072 acfm Exit temperature: 370 °F (460.93 °C)
3	<u>300 Sellers Boiler:</u> Manufacturer: Sellers Model: 105E Burner Model: 4000-C-P Manufacture Date: 1992 Heat input rating: 12.56 MMBtu/hr Fuel: Natural Gas	N/A	<u>300HP Exhaust:</u> Exit height: 51.0 ft (15.54 m) Exit diameter: 1.833 ft (0.559 m) Exit flow rate: 3,419 acfm Exit temperature: 370 °F (460.93 °C)
4	<u>200 Sellers Boiler:</u> Manufacturer: Sellers Model: 105E Burner Model: 3000-C-P Manufacture Date: 1992 Heat input rating: 8.37 MMBtu/hr Fuel: Natural Gas	N/A	<u>200HP Exhaust:</u> Exit height: 46.0 ft (14.02 m) Exit diameter: 1.67 ft (0.508 m) Exit flow rate: 2,327 acfm Exit temperature: 370 °F (460.93 °C)
5	<u>Sellers Water Heater:</u> Manufacturer: Sellers Model: BT100-1500 Burner Model: 3000-C-P Manufacture Date: 2018 Heat input rating: 10.0 MMBtu/hr Fuel: Natural Gas	N/A	<u>WHTR Exhaust:</u> Exit height: 34.0 ft (10.36 m) Exit diameter: 1.883 ft (0.559 m) Exit flow rate: 2546 acfm Exit temperature: 300 °F (422.04 °C)
6	<u>MPO L1:</u> Manufacturer: MPO Model: D421 Burner Model: 425 Manufacture Date: 1/1992 Heat input rating: 0.450 MMBtu/hr Fuel: Natural Gas	N/A	<u>F11 Exhaust:</u> Exit height: 36.0 ft (10.97 m) Exit diameter: 1.0 ft (0.305 m) Exit flow rate: 915 acfm Exit temperature: 298 °F (420.93 °C)
7	<u>MPO L2:</u> Manufacturer: MPO Model: D421 Burner Model: 425 Manufacture Date: 2/1996 Heat input rating: 0.450 MMBtu/hr Max. production: 4,375 lb/hr Fuel: Natural gas	N/A	<u>F21 Exhaust:</u> Exit height: 36.0 ft (10.97 m) Exit diameter: 1.0 ft (0.305 m) Exit flow rate: 915 acfm Exit temperature: 298 °F (420.93 °C)
8	<u>Fajita Brander L1:</u> Manufacturer: Custom built Model: 125 Burner Model: L-B Manufacture Date: 10/1998 Heat input rating: 0.650 MMBtu/hr Max. production: 4,375 lb/hr Fuel: Natural gas	N/A	<u>F12 Exhaust:</u> Exit height: 36 ft (10.97 m) Exit diameter: 1.67 ft (0.508 m) Exit flow rate: 629 acfm Exit temperature: 213 °F (373.71 °C)

Source ID No.	Sources	Control Equipment	Emission Point ID No.
9	<u>Fajita Brander L2:</u> Manufacturer: Custom built Model: 125 Burner Model: L-B Manufacture Date: 10/1998 Heat input rating: 0.650 MMBtu/hr Max. production: 4,375 lb/hr Fuel: Natural gas	N/A	<u>F22 Exhaust:</u> Exit height: 36.0 ft (10.97 m) Exit diameter: 1.0 ft (0.305 m) Exit flow rate: 629 acfm Exit temperature: 213 °F (373.71 °C)
10	<u>Unitherm L1:</u> Manufacturer: Unitherm Model: 42-12BP Burner Model: L-B Manufacture Date: 2012 Heat input rating: 5.0 MMBtu/hr Max. production: 2,000 lb/hr Fuel: Natural gas	N/A	<u>U11 Exhaust:</u> Exit height: 40.0 ft (12.19 m) Exit diameter: 2.5 ft (0.762 m) Exit flow rate: 12,000 acfm Exit temperature: 190 °F (360.93 °C)
11	<u>Unitherm L2:</u> Manufacturer: Unitherm Model: 42-12BP Burner Model: L-B Manufacture Date: 2012 Heat input rating: 5.0 MMBtu/hr Max. production: 2,000 lb/hr Fuel: Natural gas	N/A	<u>U21 Exhaust:</u> Exit height: 40.0 ft (12.19 m) Exit diameter: 2.5 ft (0.762 m) Exit flow rate: 12,000 acfm Exit temperature: 190 °F (360.93 °C)
12	<u>Cook King P3:</u> Manufacturer: Cook King Model: CB3445L Burner Model: L-B Manufacture Date: 2013 Heat input rating: 1.80 MMBtu/hr Max. production: 1,750 lb/hr Fuel: Natural gas	N/A	<u>P31 Exhaust:</u> Exit height: 8 ft (2.44 m) Exit diameter: 1.0 ft (0.305 m) Exit flow rate: 3,500 acfm Exit temperature: 190 °F (360.93 °C)
13	<u>Fajita Fulton:</u> Manufacturer: Fulton Model: ST1260F Burner Model: FT-0400-C Manufacture Date: 2001 Heat input rating: 2.40 MMBtu/hr Fuel: Natural gas	N/A	<u>FAJFUL Exhaust:</u> Exit height: 29.0 ft (8.84 m) Exit diameter: 1.0 ft (0.305 m) Exit flow rate: 531 acfm Exit temperature: 200 °F (366.48 °C)
14	<u>Cook Fulton:</u> Manufacturer: Fulton Model: FT0240C Burner Model: FT-0240-C Manufacture Date: 1997 Heat input rating: 4.0 MMBtu/hr Fuel: Natural gas	N/A	<u>COOKFUL Exhaust:</u> Exit height: 29.0 ft (8.84 m) Exit diameter: 1.0 ft (0.305 m) Exit flow rate: 884 acfm Exit temperature: 200 °F (366.48 °C)
15	<u>Fulton Thermal Fluid Heater:</u> Manufacturer: Fulton Model: FT-0600CU Burner Model: LMV51 Manufacture Date: 2014 Heat input rating: 8.0 MMBtu/hr Fuel: Natural gas	N/A	<u>NEWFUL Exhaust:</u> Exit height: 59 ft (18.0 m) Exit diameter: 1.67 ft (0.51 m) Exit flow rate: 1,769 acfm Exit temperature: 200 °F (93.3 °C)
16	<u>Emergency IC Engine Powering a Fire Water Pump:</u> Manufacturer: Cummins Model: CFP 59-F55 Manufacture Date: 2006 Horsepower rating: 200 bhp Fuel: Diesel	N/A	<u>FIRE Exhaust:</u> Exit height: 8 ft (2.44 m) Exit diameter: 0.333 ft (0.102 m) Exit flow rate: 1,300 acfm Exit temperature: 850 °F (727.59 °C)

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.

Using this definition of Potential to Emit an emission inventory was developed for the four natural gas-fired boilers, the water heater, the MPOs, the Unitherms, the Fulton heaters, the Cook King, and the emergency IC engine operations at the facility (see Appendix A) associated with this proposed project. For the four natural gas-fired boilers, the water heater, the MPOs, the Unitherms, the Fulton heaters, and the Cook King, emissions estimates of criteria pollutant, GHG, HAP PTE were based on emission factors from AP-42, operation of 8,760 hours per year, and source testing performed on the cooking equipment at the facility for this proposed project. For the diesel-fired emergency IC engine emissions estimates of criteria pollutant, GHG, HAP PTE were based on emission factors from AP-42 and operation of 100 hours per year.

Uncontrolled Potential to Emit

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a "Synthetic Minor" source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for regulated air pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For the four natural gas-fired boilers, the water heater, the MPOs, the Unitherms, the Fulton heaters, and the Cook King, emissions estimates of criteria pollutant, GHG, HAP PTE were based on emission factors from AP-42, operation of 8,760 hours per year, and source testing performed on the cooking equipment at the facility for this proposed project. For the diesel-fired emergency IC engine emissions estimates of criteria pollutant, GHG, HAP PTE were based on emission factors from AP-42 and operation of 100 hours per year. This was done as there are no add-on controls for the emissions units and 8,760 hrs/yr of annual operation were assumed (except for the emergency IC engine).

Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources					
500 Sellers Boiler	0.683	0.054	8.984	7.547	0.494
350 Clayton Boiler	0.478	0.038	6.289	5.283	0.346
300 Sellers Boiler	0.410	0.032	5.391	4.529	0.297
200 Sellers Boiler	0.273	0.022	3.594	3.020	0.198
Sellers Water Heater	0.326	0.026	4.294	3.607	0.236
MPO L1	0.125	0.0012	0.193	0.162	1.92
MPO L2	0.125	0.0012	0.193	0.162	1.92
Fajita Brander L1	0.125	0.0017	0.279	0.235	1.92
Fajita Brander L2	0.125	0.0017	0.279	0.235	1.92
Unitherm L1	0.06	0.0129	2.147	1.804	13.14
Unitherm L2	0.06	0.0129	2.147	1.804	13.14
Cook King	0.05	0.0046	0.773	0.649	11.50
Fajita Fulton	0.078	0.0062	1.031	0.866	0.057
Cook Fulton	0.131	0.010	1.718	1.443	0.095
Fulton Thermal Fluid Heater	0.262	0.020	3.436	2.886	0.19
Emergency IC Engine	1.93	1.80	27.16	5.85	2.20
Total, Point Sources	5.24	2.04	67.91	40.08	49.57

The following table presents the uncontrolled Potential to Emit for HAP pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit.

Table 3 UNCONTROLLED POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS

Hazardous Air Pollutants	PTE (T/yr)
Arsenic	0.00007
Benzene	0.00788
Beryllium	0.000005
Cadmium	0.000412
Chromium	0.000350
Cobalt	0.000031
Dichlorobenzene	0.000451
Formaldehyde	0.0281
Hexane	0.6745
Manganese	0.000142
Mercury	0.000097
Naphthalene	0.000229
Nickel	0.000788
Selenium	0.000009
Toluene	0.001275
Total	0.71

Pre-Project Potential to Emit

The following table presents the pre-project potential to emit for all criteria pollutants for the emission unit being replaced, as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 4 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	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)
Sellers Water Heater	0.075	0.326	0.006	0.026	0.980	4.294	0.824	3.607	0.054	0.236
Pre-Project Totals	0.08	0.33	0.01	0.03	0.98	4.29	0.82	3.61	0.05	0.24

- 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.

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 pollutants from all of the emission units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 5 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	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)
Sellers Water Heater (replacement unit)	0.075	0.326	0.006	0.026	0.980	4.294	0.824	3.607	0.054	0.236
Post Project Totals	0.08	0.33	0.01	0.03	0.98	4.29	0.82	3.61	0.05	0.24

- 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 6 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	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	0.08	0.33	0.01	0.03	0.98	4.29	0.82	3.61	0.05	0.24
Post Project Potential to Emit	0.08	0.33	0.01	0.03	0.98	4.29	0.82	3.61	0.05	0.24
Changes in Potential to Emit	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Non-Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase, if any, of non-carcinogenic toxic air pollutants (TAP) is provided in the following table.

Pre- and post-project, as well as the change in, non-carcinogenic TAP emissions are presented in the following table:

Table 7 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS

Non-Carcinogenic Toxic Air Pollutants	Pre-Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Barium	4.31E-05	4.31E-05	0.0000	0.03	No
Chromium	9.15E-06	9.15E-06	0.0000	0.03	No
Cobalt	8.24E-07	8.24E-07	0.0000	0.00	No
Copper	8.33E-06	8.33E-06	0.0000	0.01	No
Hexane (n,hexane)	1.76E-02	1.76E-02	0.0000	12.00	No
Manganese	3.73E-06	3.73E-06	0.0000	0.07	No
Molybdenum	1.08E-05	1.08E-05	0.0000	0.67	No
Nitrous Oxide	2.16E-02	2.16E-02	0.0000	6.00	No
Naphthalene	5.98E-06	5.98E-06	0.0000	3.33	No
Pentane	2.55E-02	2.55E-02	0.0000	118.00	No
Selenium	2.35E-07	2.35E-07	0.0000	0.01	No
Toluene	3.33E-05	3.33E-05	0.0000	25.00	No
Vanadium	2.25E-05	2.25E-05	0.0000	0.00	No
Zinc	2.84E-04	2.84E-04	0.0000	0.67	No

There were no changes in emissions rates for non-carcinogenic TAP as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average non-carcinogenic screening ELs identified in IDAPA 58.01.01.585 were exceeded.

Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of carcinogenic toxic air pollutants (TAP) is provided in the following table.

Table 8 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR CARCINOGENIC TOXIC AIR POLLUTANTS

Carcinogenic Toxic Air Pollutants	Pre-Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Post Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Change in Annual Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Arsenic compounds	1.96E-06	1.96E-06	0.0000	1.5E-06	No
Benzene	2.06E-05	2.06E-05	0.0000	8.0E-04	No
Beryllium	1.18E-07	1.18E-07	0.0000	2.8E-05	No
Cadmium	1.08E-05	1.08E-05	0.0000	3.7E-06	No
Formaldehyde	7.35E-04	7.35E-04	0.0000	5.1E-04	No
3-Methylchloranthrene	1.76E-08	1.76E-08	0.0000	2.5E-06	No
Nickel	2.06E-05	2.06E-05	0.0000	2.7E-05	No
POM ^(a)	1.12E-07	1.12E-07	0.0000	2.0E-06	No

a) Polycyclic Organic Matter (POM) or PAH group is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. The total is compared to benzo(a)pyrene.

There were no changes in emissions rates for carcinogenic TAP as a result of this project. Therefore, modeling is not required for any carcinogenic TAP because none of the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Post Project HAP Emissions

The following table presents the post project potential to emit for HAP pollutants from for the one emission unit being modified as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 9 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

Hazardous Air Pollutants	PTE (lb/hr)	PTE (T/yr)
Arsenic	1.96E-06	0.00001
Benzene	2.06E-05	0.000090
Beryllium	1.18E-07	0.000001
Cadmium	1.08E-05	0.000047
Chromium	9.15E-06	0.000040
Cobalt	8.24E-07	0.000004
Dichlorobenzene	1.18E-05	0.000052
Formaldehyde	7.35E-04	0.0032
Hexane	1.76E-02	0.0771
Manganese	3.73E-06	0.000016
Mercury	2.55E-06	0.000011
Naphthalene	5.98E-06	0.000026
Nickel	2.06E-05	0.000090
Selenium	2.35E-07	0.000001
Toluene	3.33E-05	0.000146
Totals	0.02	0.08

Ambient Air Quality Impact Analyses

The changes in estimated emission rates of PM₁₀, PM_{2.5}, SO₂, NO_x, CO, VOC, HAP, and TAP from this project were below applicable screening emission levels (EL) and published DEQ modeling thresholds established in IDAPA 58.01.01.585-586 and in the State of Idaho Air Quality Modeling Guideline¹. Refer to the Emissions Inventories section for additional information concerning the emission inventories.

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. The applicant has also demonstrated pre-construction compliance to DEQ’s satisfaction that there is no emissions increase due to this project and the facility will therefore 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 Canyon County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

- A = Use when any one HAP has actual or potential emissions ≥ 10 T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions ≥ 25 T/yr.
- SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits ≥ 8 T/yr of a single HAP or ≥ 20 T/yr of THAP.
- SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are

¹ Criteria pollutant thresholds in Table 2, State of Idaho Guideline for Performing Air Quality Impact Analyses, Doc ID AQ-011, September 2013.

limited to < 8 T/yr of a single HAP and/or < 20 T/yr of THAP.

- B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold
- UNK = Class is unknown

For All Other Pollutants:

- A = Actual or potential emissions of a pollutant are \geq 100 T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are \geq 80 T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are < 80 T/yr.
- B = Actual and potential emissions are < 100 T/yr without permit restrictions.
- UNK = Class is unknown.

Table 10 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	5.24	5.24	100	B
PM ₁₀	5.24	5.24	100	B
PM _{2.5}	5.24	5.24	100	B
SO ₂	2.04	2.04	100	B
NO _x	67.91	67.91	100	B
CO	40.08	40.08	100	B
VOC	49.57	49.57	100	B
HAP (single)	0.67	0.67	10	B
HAP (total)	0.67	0.67	25	B
Pb	0	0	100	B

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 replacement emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 Tier II Operating Permit

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

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 Visible Emissions

The sources of PM emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.4 and 3.4.

Standards for New Sources (IDAPA 58.01.01.676)

IDAPA 58.01.01.676 Standards for New Sources

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 Conditions 2.5 and 3.5.

Particulate Matter – New Equipment Process Weight Limitations (IDAPA 58.01.01.701)

IDAPA 58.01.01.701 Particulate Matter – New Equipment Process Weight Limitations

IDAPA 58.01.01.700 through 703 set PM emission limits for process equipment based on when the piece of equipment commenced operation and the piece of equipment’s process weight (PW) in pounds per hour (lb/hr). IDAPA 58.01.01.701 and IDAPA 58.01.01.702 establish PM emission limits for equipment that commenced operation on or after October 1, 1979 and for equipment operating prior to October 1, 1979, respectively.

For equipment that commenced operation on or after October 1, 1979, the PM allowable emission rate (E) is based on one of the following four equations:

IDAPA 58.01.01.701.01.a: If PW is < 9,250 lb/hr; $E = 0.045 (PW)^{0.60}$

IDAPA 58.01.01.701.01.b: If PW is ≥ 9,250 lb/hr; $E = 1.10 (PW)^{0.25}$

For equipment that commenced prior to October 1, 1979, the PM allowable emission rate is based on one of the following equations:

IDAPA 58.01.01.702.01.a: If PW is < 17,000 lb/hr; $E = 0.045 (PW)^{0.60}$

IDAPA 58.01.01.702.01.b: If PW is ≥ 17,000 lb/hr; $E = 1.12 (PW)^{0.27}$

For this facility the Multi-Purpose Ovens (MPOs), Fajita Branders, Unitherm flame grills, and Cook King oven are subject to this requirement. These process lines were all constructed after October 1, 1979 and have hourly throughputs of less than 9,250 lb/hr.

For the existing Multi-Purpose Ovens (MPOs) emissions units with a proposed throughput of 4,375 lb/hr, E is calculated as follows:

Therefore, E is calculated as:

$E = 0.045 \times PW^{0.60} = 0.045 \times (4,375)^{0.60} = 6.88 \text{ lb-PM/hr}$

As presented previously in the Emissions Inventories Section of this evaluation the post project PTE for this emissions unit is 0.028 lb-PM₁₀/hr. Assuming PM is 50% PM₁₀ means that PM emissions will be 0.056 lb-PM/hr (0.028 lb-PM₁₀/hr ÷ 0.5 lb-PM₁₀/lb-PM). Therefore, compliance with this requirement has been demonstrated.

For the existing Unitherm flame grills emissions units with a proposed throughput of 2,000 lb/hr, E is calculated as follows:

Therefore, E is calculated as:

$E = 0.045 \times PW^{0.60} = 0.045 \times (2,000)^{0.60} = 4.30 \text{ lb-PM/hr}$

As presented previously in the Emissions Inventories Section of this evaluation the post project PTE for this emissions unit is 0.01 lb-PM₁₀/hr. Assuming PM is 50% PM₁₀ means that PM emissions will be 0.02 lb-PM/hr (0.01 lb-PM₁₀/hr ÷ 0.5 lb-PM₁₀/lb-PM). Therefore, compliance with this requirement has been demonstrated.

For the existing Cook King oven emissions unit with a proposed throughput of 1,750 lb/hr, E is calculated as follows:

Therefore, E is calculated as:

$E = 0.045 \times PW^{0.60} = 0.045 \times (1,750)^{0.60} = 3.97 \text{ lb-PM/hr}$

As presented previously in the Emissions Inventories Section of this evaluation the post project PTE for this emissions unit is 0.01 lb-PM₁₀/hr. Assuming PM is 50% PM₁₀ means that PM emissions will be 0.02 lb-PM/hr (0.01 lb-PM₁₀/hr ÷ 0.5 lb-PM₁₀/lb-PM). Therefore, compliance with this requirement has been demonstrated.

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

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM, PM₁₀, PM_{2.5}, SO₂, NO_x, CO, and VOC or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

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 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)

Because the facility has four natural gas-fired boilers and a hot water heater the following NSPS requirement applies to this facility:

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

DEQ has been delegated authority to this subpart.

Sections that are highlighted are applicable to the emissions units at the facility.

§ 60.40c Applicability and delegation of authority

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

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

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

(d) Any temporary change to an existing steam generating unit for the purpose of conducting combustion research is not considered a modification under §60.14.

(e) Affected facilities (i.e. heat recovery steam generators and fuel heaters) that are associated with stationary combustion turbines and meet the applicability requirements of subpart KKKK of this part are not subject to this subpart. This subpart will continue to apply to all other heat recovery steam generators, fuel heaters, and other affected facilities that are capable of combusting more than or equal to 2.9 MW (10 MMBtu/h) heat input of fossil fuel but less than or equal to 29 MW (100 MMBtu/h) heat input of fossil fuel. If the heat recovery steam generator, fuel heater, or other affected facility is subject to this subpart, only emissions resulting from combustion of fuels in the steam generating unit are subject to this subpart. (The stationary combustion turbine emissions are subject to subpart GG or KKKK, as applicable, of this part.)

(f) Any affected facility that meets the applicability requirements of and is subject to subpart AAAA or subpart CCCC of this part is not subject to this subpart.

(g) Any facility that meets the applicability requirements and is subject to an EPA approved State or Federal section 111(d)/129 plan implementing subpart BBBB of this part is not subject to this subpart.

(h) Affected facilities that also meet the applicability requirements under subpart J or subpart Ja of this part are subject to the PM and NO_x standards under this subpart and the SO₂ standards under subpart J or subpart Ja of this part, as applicable.

(i) Temporary boilers are not subject to this subpart.

The 500 Sellers Boiler, 350 Clayton Boiler, 300 Sellers Boiler, and Sellers Water Heater are all rated at 10 to 100 MMBtu/hr. Therefore, the 500 Sellers Boiler, 350 Clayton Boiler, 300 Sellers Boiler, and Sellers Water Heater are subject to the requirements of Subpart Dc.

§ 60.41c Definitions

Steam generating unit means a device that combusts any fuel and produces steam or heats water or heats any heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

The definitions of this subpart apply to all the boilers and the water heater that are subject to this subpart.

§ 60.42c Standards for sulfur dioxide (SO₂)

(b) Except as provided in paragraphs (c) and (e) of this section, on and after the date on which the performance test is completed or required to be completed under §60.8, whichever date comes first, the owner or operator of an affected facility that:

(1) Combusts only coal refuse alone in a fluidized bed combustion steam generating unit shall neither:

(i) Cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 87 ng/J (0.20 lb/MMBtu) heat input or 20 percent (0.20) of the potential SO₂ emission rate (80 percent reduction); nor

(ii) Cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of SO₂ in excess of 520 ng/J (1.2 lb/MMBtu) heat input. If coal is fired with coal refuse, the affected facility subject to paragraph (a) of this section. If oil or any other fuel (except coal) is fired with coal refuse, the affected facility is subject to the 87 ng/J (0.20 lb/MMBtu) heat input SO₂ emissions limit or the 90 percent SO₂ reduction requirement specified in paragraph (a) of this section and the emission limit is determined pursuant to paragraph (e)(2) of this section.

(2) Combusts only coal and that uses an emerging technology for the control of SO₂ emissions shall neither:

(i) Cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 50 percent (0.50) of the potential SO₂ emission rate (50 percent reduction); nor

(ii) Cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 260 ng/J (0.60 lb/MMBtu) heat input. If coal is combusted with other fuels, the affected facility is subject to the 50 percent SO₂ reduction requirement specified in this paragraph and the emission limit determined pursuant to paragraph (e)(2) of this section.

The 500 Sellers Boiler, 350 Clayton Boiler, 300 Sellers Boiler, and Sellers Water Heater all combust natural gas exclusively. Therefore, the SO₂ standards of this subpart do not apply to the 500 Sellers Boiler, 350 Clayton Boiler, 300 Sellers Boiler, or Sellers Water Heater.

§ 60.43c Standards for particulate matter (PM)

(a) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commenced construction, reconstruction, or modification on or before February 28, 2005, that combusts coal or combusts mixtures of coal with other fuels and has a heat input capacity of 8.7 MW (30 MMBtu/h) or greater, shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of the following emission limits:

- (1) 22 ng/J (0.051 lb/MMBtu) heat input if the affected facility combusts only coal, or combusts coal with other fuels and has an annual capacity factor for the other fuels of 10 percent (0.10) or less.
- (2) 43 ng/J (0.10 lb/MMBtu) heat input if the affected facility combusts coal with other fuels, has an annual capacity factor for the other fuels greater than 10 percent (0.10), and is subject to a federally enforceable requirement limiting operation of the affected facility to an annual capacity factor greater than 10 percent (0.10) for fuels other than coal.

The 500 Sellers Boiler, 350 Clayton Boiler, 300 Sellers Boiler, and Sellers Water Heater all combust natural gas exclusively. Therefore, the PM standards of this subpart do not apply to the 500 Sellers Boiler, 350 Clayton Boiler, 300 Sellers Boiler, or the Sellers Water Heater.

§ 60.48c Reporting and recordkeeping requirements

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

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
- (4) Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

The 500 Sellers Boiler, 350 Clayton Boiler, 300 Sellers Boiler, and Sellers Water Heater are subject to these requirements. Permit Condition 2.7 includes the requirements of this section.

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

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

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

The 500 Sellers Boiler, 350 Clayton Boiler, 300 Sellers Boiler, and Sellers Water Heater are subject to these requirements. Permit Condition 2.8 includes the requirements of this section.

(h) The owner or operator of each affected facility subject to a federally enforceable requirement limiting the annual capacity factor for any fuel or mixture of fuels under §60.42c or §60.43c shall calculate the annual capacity factor individually for each fuel combusted. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of the calendar month.

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

The 500 Sellers Boiler, 350 Clayton Boiler, 300 Sellers Boiler, and Sellers Water Heater were not limited in their annual capacity. Therefore, they are not subject to this requirement.

(j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

The 500 Sellers Boiler, 350 Clayton Boiler, 300 Sellers Boiler, and Sellers Water Heater are subject to these requirements. Permit Condition 2.9 includes the requirements of this section.

NESHAP Applicability (40 CFR 61)

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

MACT/GACT Applicability (40 CFR 63)

Because the facility has an existing compression-ignited IC engine (the emergency IC engine powering a fire water pump) the following NESHAP requirements apply to this facility:

- 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

DEQ has been delegated authority to this subpart.

Sections that are highlighted are applicable to the emissions units at the facility.

40 CFR 63, Subpart ZZZZ..... National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

§ 63.6580 What is the purpose of subpart ZZZZ?

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

§ 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 differ 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.

(b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.

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

(d) If you are an owner or operator of an area source subject to this subpart, your status as an entity subject to a standard or other requirements under this subpart does not subject you to the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart as applicable.

(e) If you are an owner or operator of a stationary RICE used for national security purposes, you may be eligible to request an exemption from the requirements of this subpart as described in 40 CFR part 1068, subpart C.

This facility is an area source for HAPs emissions. Therefore, the existing emergency IC engine powering a fire water pump is subject to the requirements of Subpart ZZZZ.

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

This subpart applies to each affected source.

Section (a) defines an affected source as 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.

Sections (1)(i) through (1)(iv) defines existing stationary RICE as the following:

For stationary RICE with a site rating of more than 500 brake horsepower (bhp) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.

For stationary RICE with a site rating of less than or equal to 500 brake bhp located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

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.

A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

Sections (2)(i) through (2)(iii) defines new stationary RICE as the following:

A stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after December 19, 2002.

A stationary RICE with a site rating of equal to or less than 500 bhp located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

Section (3)(i) through (2)(iii) defines reconstructed stationary RICE as the following:

A stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after December 19, 2002.

A stationary RICE with a site rating of equal to or less than 500 bhp located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.

A stationary RICE located at an area source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.

Section (b) specifies which stationary RICE are subject to limited requirements of this subpart. An affected source which meets either of the criteria in paragraphs (b)(1)(i) through (ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(f). The requirements of (b)(1)(i) through (ii) are as follows:

The stationary RICE is a new or reconstructed emergency stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions.

The stationary RICE is a new or reconstructed limited use stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions.

Section (2) specifies that a new or reconstructed stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10% or more of the gross heat input on an annual basis must meet the initial notification requirements of §63.6645(f) and the requirements of §§63.6625(c), 63.6650(g), and 63.6655(c). These stationary RICE do not have to meet the emission limitations and operating limitations of this subpart.

Section (3) allows that the following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements:

Existing spark ignition 2-stroke lean-burn (2SLB) stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;

Existing spark ignition 4-stroke lean-burn (4SLB) stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;

Existing emergency stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;

Existing limited use stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;

Existing stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions that combusts landfill gas or digester gas equivalent to 10% or more of the gross heat input on an annual basis;

Existing residential emergency stationary RICE located at an area source of HAP emissions;

Existing commercial emergency stationary RICE located at an area source of HAP emissions; or

Existing institutional emergency stationary RICE located at an area source of HAP emissions.

The existing emergency IC engine powering a fire water pump were installed prior to June 12, 2006 per the Applicant. Therefore, for Subpart ZZZZ the existing emergency IC engine powering a fire water pump is considered "existing."

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

(a) Affected sources.

(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, operating limitations and other requirements 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, operating limitations, and other requirements 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, operating limitations, and other requirements no later than October 19, 2013.

(2) If you start up your new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions before August 16, 2004, you must comply with the applicable emission limitations and operating limitations in this subpart no later than August 16, 2004.

(3) If you start up your new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions after August 16, 2004, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.

(4) If you start up your new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions before January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart no later than January 18, 2008.

(5) If you start up your new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions after January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.

(6) If you start up your new or reconstructed stationary RICE located at an area source of HAP emissions before January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart no later than January 18, 2008.

(7) If you start up your new or reconstructed stationary RICE located at an area source of HAP emissions after January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.

(b) Area sources that become major sources. If you have an area source that increases its emissions or its potential to emit such that it becomes a major source of HAP, the compliance dates in paragraphs (b)(1) and (2) of this section apply to you.

(1) Any stationary RICE for which construction or reconstruction is commenced after the date when your area source becomes a major source of HAP must be in compliance with this subpart upon startup of your affected source.

(2) Any stationary RICE for which construction or reconstruction is commenced before your area source becomes a major source of HAP must be in compliance with the provisions of this subpart that are applicable to RICE located at major sources within 3 years after your area source becomes a major source of HAP.

(c) If you own or operate an affected source, you must meet the applicable notification requirements in §63.6645 and in 40 CFR part 63, subpart A.

Therefore, the emergency IC engine powering a fire water pump shall comply with Subpart ZZZZ on and after May 3, 2013. This requirement is assured by Permit Condition 4.5.

§ 63.6603 What emission limitations, operating limitations, and other requirements 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 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 that apply to you.

Table 11 - Table 2D to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

For each...	You must meet the following requirement, except during periods of startup...	During periods of startup you must...
4. Emergency stationary CI RICE and black start stationary CI RICE.	a. Change oil and filter every 500 hours of operation or annually, whichever comes first;	
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and	
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	

Therefore, the emergency IC engine powering a fire water pump shall comply with these requirements. This requirement is assured by Permit Condition 4.5.

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

(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

- (1) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).
 - (i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. 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 calendar year.
 - (ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
 - (iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

Therefore, the emergency IC engine powering a fire water pump shall comply with these requirements. This requirement is assured by Permit Condition 4.6.

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 Section 1, Table 1.1 Regulated Sources

The manufacture date for the Sellers Water Heater source was updated to 2018 for the replacement unit. All other parameters remain the same.

PUBLIC REVIEW

Public Comment Opportunity

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

APPENDIX A – EMISSIONS INVENTORIES

CTI Water Heater Replacement

Fuel Burning PTE Emissions – 2018 Sellers Water Heater

Model BT100-1500

INPUT – BTU/HR 10,000,000

FUEL: Natural Gas

Reference AP-42 section 1.4 (7/98) Emissions Factors for Industrial Boilers Burning Natural Gas

Natural Gas	PM ₁₀ ^e / PM _{2.5} ^h	SO ₂	NO _x	CO	VOC
Boilers	7.6 lb/MMCF	.6 lb/MMCF	100 lb/MMCF	84 lb/MMCF	5.5 lb/MMCF

SOURCE	PM ₁₀ ^e / PM _{2.5} ^h		SO ₂		NO _x		CO		VOC	
	lb/hr	t/yr	lb/hr	t/yr	lb/hr	t/yr	lb/hr	t/yr	lb/hr	t/yr
2018 Sellers Water Heater Model: BT100-1500 MMBtu/hr: 10.00	0.0745	0.3264	0.0059	0.0258	0.9804	4.2941	0.8235	3.6071	0.0539	0.2362

Modeled NAAQS Emission Rates for the 1992 Sellers Water Heater, Model BT100-1500, 10 MMBtu unit

Source ID		Pollutant	Averaging Period	Emissions (lb/hr)	
WHTR	Water Heater – Sellers 10 MMBtu	PM _{2.5}	24-hr	0.0745	
			Annual	0.0745	
		PM ₁₀	24-hr	0.0745	
			NO _x	1-hr	0.9804
				Annual	0.9804

Modeled TAP Emission Rates for the 1992 Sellers Water Heater, Model BT100-1500, 10 MMBtu unit

Source ID		Pollutant	Averaging Period	Emissions (lb/hr)
WHTR	Water Heater – Sellers 10 MMBtu	Arsenic	Annual	1.96E-06
		Cadmium	Annual	1.08E-05
		Formaldehyde	Annual	7.35E-04
		Nickel	Annual	2.06E-05

CTI Water Heater Replacement Form 696257 Tables

**Table 1. PRE- AND POST PROJECT NON-CARCINOGENIC TAP EMISSIONS SUMMARY
POTENTIAL TO EMIT**

Non-Carcinogenic Toxic Air Pollutants (sum of all emissions)	Pre-Project 24- hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24- hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24- hour Average Emissions Rates for Units at the Facility (lb/hr)	Non- Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Barium	4.31E-05	4.31E-05	0	0.03	No
Chromium	9.15E-06	9.15E-06	0	0.03	No
Cobalt	8.24E-07	8.24E-07	0	0.00	No
Copper	8.33E-06	8.33E-06	0	0.01	No
Hexane (n,hexane)	1.76E-02	1.76E-02	0	12.00	No
Manganese	3.73E-06	3.73E-06	0	0.07	No
Molybdenum	1.08E-05	1.08E-05	0	0.67	No
N2O	2.16E-02	2.16E-02	0	6.00	No
Naphthalene	5.98E-06	5.98E-06	0	3.33	No
Pentane	2.55E-02	2.55E-02	0	118.00	No
Selenium	2.35E-07	2.35E-07	0	0.01	No
Toluene	3.33E-05	3.33E-05	0	25.00	No
Vanadium	2.25E-05	2.25E-05	0	0.00	No
Zinc	2.84E-04	2.84E-04	0	0.67	No

Table 2. PRE- AND POST PROJECT CARCINOGENIC TAP EMISSIONS SUMMARY POTENTIAL TO EMIT

Carcinogenic Toxic Air Pollutants (sum of all emissions)	Pre-Project 24- hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24- hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24- hour Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Arsenic	1.96E-06	1.96E-06	0	1.50E-06	No
Benzene	2.06E-05	2.06E-05	0	8.00E-04	No
Beryllium	1.18E-07	1.18E-07	0	2.80E-05	No
Cadmium	1.08E-05	1.08E-05	0	3.70E-06	No
Formaldehyde	7.35E-04	7.35E-04	0	5.10E-04	No
3-Methylcholanthrene	1.76E-08	1.76E-08	0	2.50E-06	No
Nickel	2.06E-05	2.06E-05	0	2.70E-05	No
Polycyclic Organic Matter (POM)	1.12E-07	1.12E-07	0	2.00E-06	No

a) Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. The total is compared to benzo(a)pyrene.

CTI Water Heater HAPs and TAPS

Natural Gas

Reference: AP-42 section 1.4 (7/98) Emission Factors for Industrial Boilers Burning Natural Gas

Heat Input 10.00 10⁶ Btu/hr
 Natural Gas 1,020 Btu/cf
 Hours per year 8,760

Pollutant	Factor		Emission Rate lb/hr	Idaho EL lb/hr	Idaho Toxic Class	Federal HAP	PTE Emission Rate t/yr
	lb/10 ⁶ CF	lb/10 ⁶ Btu					
Arsenic	2.0E-04	1.96E-07	1.96E-06	1.5E-06	A	Yes	8.59E-06
Benzene	2.1E-03	2.06E-06	2.06E-05	8.0E-04	A	Yes	9.02E-05
Beryllium	1.2E-05	1.18E-08	1.18E-07	2.8E-05	A	Yes	5.15E-07
Cadmium	1.1E-03	1.08E-06	1.08E-05	3.7E-06	A	Yes	4.72E-05
Formaldehyde	7.5E-02	7.35E-05	7.35E-04	5.1E-04	A	Yes	3.22E-03
3-Methylcholanthrene	1.80E-06	1.76E-09	1.76E-08	2.5E-06	A		7.73E-08
Nickel	2.1E-03	2.06E-06	2.06E-05	2.7E-05	A	Yes	9.02E-05
Polycyclic Organic Matter (POM)	1.14E-05	1.12E-08	1.12E-07	2.0 E-06	A		4.90E-07
Barium	4.4E-03	4.31E-06	4.31E-05	0.03	B		1.89E-04
Chromium	9.3E-04	9.15E-07	9.15E-06	0.033	B	Yes	4.01E-05
Cobalt	8.4E-05	8.24E-08	8.24E-07	0.0033	B	Yes	3.61E-06
Copper	8.5E-04	8.33E-07	8.33E-06	0.013	B		3.65E-05
Hexane (n,hexane)	1.8E+00	1.76E-03	1.76E-02	12	B	Yes	0.08
Manganese	3.8E-04	3.73E-07	3.73E-06	0.067	B	Yes	1.63E-05
Molybdenum	1.1E-03	1.08E-06	1.08E-05	0.667	B		4.72E-05
N ₂ O	2.2	2.16E-03	2.16E-02	6	B		0.09
Naphthalene	6.1E-04	5.98E-07	5.98E-06	3.33	B	Yes	2.62E-05
Pentane	2.6E+00	2.55E-03	2.55E-02	118	B		0.11
Selenium	2.4E-05	2.35E-08	2.35E-07	0.013	B	Yes	1.03E-06
Toluene	3.4E-03	3.33E-06	3.33E-05	25	B	Yes	1.46E-04
Vanadium	2.3E-03	2.25E-06	2.25E-05	0.003	B		9.88E-05
Zinc	2.9E-02	2.84E-05	2.84E-04	0.667	B		1.25E-03
2-Methylnaphthalene	2.40E-05	2.35E-08	2.35E-07				1.031E-06
7,12-Dimethylbenz(a)anthracene	1.60E-05	1.57E-08	1.57E-07				6.87E-07
Acenaphthene	1.80E-06	1.76E-09	1.76E-08				7.73E-08
Acenaphthylene	1.80E-06	1.76E-09	1.76E-08				7.73E-08
Anthracene	2.40E-06	2.35E-09	2.35E-08				1.03E-07
Benzo(g,h,i)perylene	1.20E-06	1.18E-09	1.18E-08				5.15E-08
Dichlorobenzene	1.20E-03	1.18E-06	1.18E-05			Yes	5.15E-05
Fluoranthene	3.00E-06	2.94E-09	2.94E-08				1.29E-07
Fluorene	2.80E-06	2.75E-09	2.75E-08				1.20E-07
Mercury	2.60E-04	2.55E-07	2.55E-06			Yes	1.12E-05
Phenanathrene	1.70E-05	1.67E-08	1.67E-07				7.30E-07
Pyrene	5.00E-06	4.90E-09	4.90E-08				2.15E-07
POM Emission Factor is the sum of the following substances in accordance with IDAPA 58.01.01.586 Table							
Benz(a)anthracene	1.8E-06	1.76E-09					
Benzo(a)pyrene	1.2E-06	1.18E-09					
Benzo(b)fluoranthene	1.8E-06	1.76E-09					
Benzo(k)fluoranthene	1.8E-06	1.76E-09					
Chrysene	1.8E-06	1.76E-09					
Dibenzo(a,h)anthracene	1.2E-06	1.18E-09					
Indeno(1,2,3-cd)pyrene	1.8E-06	1.76E-09					
Total							0.29

CTI Water Heater Replacement Form 696261 Table

HAP POTENTIAL TO EMIT EMISSIONS SUMMARY

HAP Pollutants	PTE (T/yr)
Arsenic	8.59E-06
Benzene	9.02E-05
Beryllium	5.15E-07
Cadmium	4.72E-05
Chromium	4.01E-05
Cobalt	3.61E-06
Dichlorobenzene	5.15E-05
Formaldehyde	3.22E-03
Hexane (n,hexane)	0.08
Manganese	1.63E-05
Mercury	1.12E-05
Naphthalene	2.62E-05
Nickel	9.02E-05
Selenium	1.03E-06
Toluene	1.46E-04
Total	0.08

CTI

Fuel Burning PTE Emissions

Natural Gas

Reference: AP-42 section 1.4 (7/98) Emission Factors for Industrial Boilers Burning Natural Gas

Natural Gas	PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO	VOC
Boilers	7.6 lb/MMCF	0.6 lb/MMCF	100 lb/MMCF	84 lb/MMCF	5.5 lb/MMCF
Process Burners	7.6 lb/MMCF	0.6 lb/MMCF	100 lb/MMCF	84 lb/MMCF	5.5 lb/MMCF

Emissions

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	lb/hr	t/yr	lb/hr	t/yr	lb/hr	t/yr	lb/hr	t/yr	lb/hr	t/yr
500 Sellers Boiler	0.1559	0.6828	0.0123	0.0539	2.0512	8.9842	1.7230	7.5467	0.1128	0.4941
350 hp Clayton Boiler	0.1091	0.4779	0.0086	0.0377	1.4358	6.2887	1.2061	5.2825	0.0790	0.3459
300 hp Sellers Boiler	0.0935	0.4097	0.0074	0.0323	1.2309	5.3913	1.0339	4.5287	0.0677	0.2965
200 hp Sellers Boiler	0.0624	0.2732	0.0049	0.0216	0.8206	3.5942	0.6893	3.0191	0.0451	0.1977
Water Heater - Sellers	0.0745	0.3264	0.0059	0.0258	0.9804	4.2941	0.8235	3.6071	0.0539	0.2362
MPO L-1	Included in Process Emissions		0.0003	0.0012	0.0441	6.2887	0.0371	0.1623	Included in Process Emissions	
MPO L-2			0.0003	0.0012	0.0441	0.1932	0.0371	0.1623		
Fajita Brander - L1			0.0004	0.0017	0.0637	0.1932	0.0535	0.2345		
Fajita Brander - L2			0.0004	0.0017	0.0637	0.2791	0.0535	0.2345		
Unitherm L-1			0.0029	0.0129	0.4902	0.2791	0.4118	1.8035		
Unitherm L-2			0.0029	0.0129	0.4902	2.1471	0.4118	1.8035		
Cook King P-3			0.0011	0.0046	0.2353	2.1471	0.1482	0.6493		
Fajita Fulton	0.0179	0.0783	0.0014	0.0062	0.3922	1.0306	0.1976	0.8657	0.0129	0.0567
Cook Fulton	0.0298	0.1305	0.0024	0.0103	0.1765	1.7176	0.3294	1.4428	0.0216	0.0945
AMU P-3	0.0002	0.0008	0.0000	0.0001	0.0025	0.0107	0.0021	0.0090	0.0001	0.0006
AMU King Air P-2	0.0003	0.0011	0.0000	0.0001	0.0034	0.0150	0.0029	0.0126	0.0002	0.0008
AMU Hastings P-1	0.0001	0.0007	0.0000	0.0001	0.0020	0.0086	0.0016	0.0072	0.0001	0.0005
AMU Hastings P-2	0.0001	0.0007	0.0000	0.0001	0.0020	0.0086	0.0016	0.0072	0.0001	0.0005
AMU Triton P-2	0.0006	0.0025	0.0000	0.0002	0.0076	0.0333	0.0064	0.0279	0.0004	0.0018
Hartzel P-1	0.0015	0.0065	0.0001	0.0005	0.0196	0.0859	0.0165	0.0721	0.0011	0.0047
Total Natural Gas	0.55	2.39	0.05	0.22	8.56	42.99	7.19	31.48	0.40	1.73

Diesel Emergency Fire Pump

CTI

Process PTE Emissions

PM Emission Factors are from IDEQ review of September 2014 source test dated 12/17/14.

VOC Emission Factors are from South Coast Air Quality Management District factors for commercial cooking.

	Product	Equipment	Emission Factor			Production (PTE)		PM _{2.5}		PM ₁₀		VOC	
			PM _{2.5} (lb/ton)	PM ₁₀ (lb/ton)	VOC (lb/ton)	lb/hr	lb/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Plant 2	Burger	Unitherm Flame Grill-1	0.013	0.013	3.0	2,000	17,520,000	0.01	0.06	0.01	0.06	3.00	13.14
		Unitherm Flame Grill-2	0.013	0.013	3.0	2,000	17,520,000	0.01	0.06	0.01	0.06	3.00	13.14
	Fajita Meat	MPO-1	0.013	0.013	0.2	4,375	38,325,000	0.028	0.125	0.028	0.125	0.44	1.92
		MPO-2	0.013	0.013	0.2	4,375	38,325,000	0.028	0.125	0.028	0.125	0.44	1.92
		Brander-1	0.013	0.013	0.2	4,375	38,325,000	0.028	0.125	0.028	0.125	0.44	1.92
		Brander-2	0.013	0.013	0.2	4,375	38,325,000	0.028	0.125	0.028	0.125	0.44	1.92
Plant 3	Burger	Cook King Oven	0.013	0.013	3.0	1,750	15,330,000	0.01	0.05	0.01	0.05	2.63	11.50
Totals								0.15	0.66	0.15	0.66	10.38	45.44

APPENDIX B – FACILITY DRAFT COMMENTS

The following comments were received from the facility on June 27, 2018:

There were no comments.

APPENDIX C – PROCESSING FEE

PTC Processing Fee Calculation Worksheet

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: CTI Foods – SSI Food Services
Address: 22303 Highway 95
City: Wilder
State: Idaho
Zip Code: 83676
Facility Contact: James Gillette
Title: Corporate PSM Env. Coordinator
AIRS No.: 027-00138

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	0	0.0
SO ₂	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	0.0	0	0.0
Fee Due	\$ 1,000.00		

Comments: P-2015.0013, Project 62069